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U.S. Department of the Interior

Grand Canyon
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Comment Form
Draft Environmental Impact Statement
Colorado River Management Plan

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Do you want to be added to the CRMP mailing list? Yes

Thank you for taking the time to comment on the CRMP. In the final EIS, every substantive comment we receive will have a response. In order to be considered substantive, your comment should (1) not just express agreement or disagreement with the analysis or conclusions in the document, but also explain why you feel that way, and (2) be in reference to some part of the EIS, or something you feel should have been in the EIS but is not. The more detail you give us, the more substantive and useful your comments will be. Please include page numbers with your comments, where appropriate. Comments must be received by January 7, 2005. This version of the comment form is designed to be printed and mailed or faxed, not to be electronically submitted. Instructions for submitting comments electronically can be found at www.nps.gov/grca/crmp.

Do you have any substantive comments or suggestions on any or all of the following? Yes

LEES FERRY ALTERNATIVES

Range of Alternatives (group size, motor use, trip length, launch schedule, etc.) (Chapter 2 pp. 36-54)

Grand Canyon River Guides feels that the Range of Alternatives (TABLE 2-2: SUMMARY OF ALTERNATIVES: LEES FERRY TO DIAMOND CREEK, Chapter 2 page 36) should have included at least one action alternative with use levels at or below current use levels. All alternatives, except the "no action" Alternative A, call for an increase in use levels, as measured in user days; no "action" alternative at current or lower use levels was examined.

As we pointed out in our comments to the scoping sessions,

"The Colorado River may have reached carrying capacity in terms of the total number of people currently using the river corridor."

This assertion is based on long-term observations of the deterioration of resources and cumulative increase of human impacts along the river corridor by our members, many of whom have been guiding Grand Canyon river trips for a quarter of a century or more. Similar impacts - but different conclusions about their importance - are noted in the DEIS.

The NPS has ignored the cumulative impact of previous management plans and use level increases. Grand Canyon River Guides believes the range of alternatives is seriously deficient: by examining only alternatives that call for increased use levels, the NPS has ignored its primary responsibility to protect and preserve resources in Grand Canyon for the enjoyment of future generations. As Section 1.4.3 of the National Park Service's Management Policies 2001 states,

"When there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant." (NPS 2000d)

The level of use proposed in this plan is nearly 2.5 times the use level set by the NPS thirty years ago when resources along the river, including beaches and campsites, were in much better shape than they are today. The steady, incremental increase in use with each new management plan is in direct conflict with the management objective stated in the 1995 General Management Plan to

**"manage the Colorado River corridor through Grand Canyon National Park to protect and preserve the resource in a wild and primitive condition."
(General Management Plan, page 7)**

Grand Canyon River Guides believes that the final plan must face up to the reality that increased use means increased cumulative impacts, and accelerates further degradation of the resource the NPS is legally bound to preserve. The alternative implemented in the final plan must address the park's responsibility to "protect and preserve the resource in a wild and primitive condition" and not accelerate degradation of the resource by another politically expedient increase in use.

Preferred Alternative H (Chapter 2 pp. 51-52)

Grand Canyon River Guides believes that preferred Alternative H is not based on a realistic analysis of recreational impacts in Grand Canyon, but rather is a politically driven attempt to appease the various groups wanting access to a Colorado River trip. Alternative H will have serious negative impacts on natural and cultural resources, visitor experience, and park operations compared to the current operations. Alternative H is not acceptable in its proposed form and needs to be modified to better protect park resources and better meet the objectives of the Colorado River Management Plan.

INCREASED USE

P. 52, "March-to-October User-Day Limits," "Winter Use"

Grand Canyon River Guides' primary concern about Alternative H is the significant increase in overall use (nearly 28%) that it proposes. It is clear that an overall increase in use could have serious negative impacts on natural resources (including the old high-water zone, trails, campsites, wildlife, water sources such as seeps, springs and tributaries, and vegetation), on irreplaceable cultural resources, and on the quality of the visitor experience. The draft EIS contends that Alternative H will have fewer impacts on these resources than the no-action Alternative A, due to smaller group sizes, smoothing of the use "spikes," and appropriate mitigations. As outlined below and detailed in our comments on the impact analysis portion of the draft EIS, GCRG believes that this assessment overlooks a number of crucial considerations.

Foremost, while reducing group size may reduce the effect that any one group might have on its surroundings, many impacts to resources are cumulative. Increased overall use is likely, for example, to accelerate the erosion of beaches, the degradation of archaeological sites, and damage to vegetation. The draft management plan suggests that these impacts will be managed through monitoring and mitigation; but the monitoring and mitigation are not specified or guaranteed by the plan, and rather depend on funding yet to be quantified and granted. How can we rely on unfunded and unspecified mitigation measures to protect resources from accelerated degradation when even the current level of use is acknowledged to be damaging those resources?

Several other factors related to the overall increased use are worth noting. The preponderance of the increased use as proposed in Alternative H occurs in the winter season. Probable user days in the winter will increase from the current 6,159 to a staggering 33,828. There are no data concerning the impacts of wintertime use on the various resources simply because the use during that time period has been so negligible to date. There is reason to suppose that vegetation, wildlife, trails, and campsites in particular might benefit from a break during the winter to recover from high use during the rest of the year. Guides have noted, for example, that they observe a difference in appearance of campsites and trails early in the spring, versus at the end of the high-use summer season.

It should also be considered that the overall increase in use, as proposed in Alternative H, is entirely in the non-commercial sector – a user group that may cause adverse impacts simply due to lack of education and understanding of the inherent value of irreplaceable cultural sites, for example. Even with the implementation of education measures, it is not possible for non-commercial boaters as a population to reach the level of stewardship and understanding exhibited by commercial river guides, simply because they lack the training and repeat experience in the canyon. Because the new non-commercial use occurs mostly in the winter season, it will also necessitate far more monitoring and enforcement, and therefore more time, money, and staff than the current level of use requires.

Additionally, administrative use is not considered within this plan, although it now constitutes a very significant 25% of all current use. The DEIS numbers of people or trips at one time in the canyon do not account for this at all - all the more reason to question the feasibility and workability of this alternative. Furthermore, there is no clarity on whether the no-motor season would apply to science trips, although we understand that minimum tool rules apply in most cases where feasible. But for those research trips that must use motors due to their nature, will

the heavy use season where motors are allowed be inundated with even more science trips, possibly launching on the same schedules and increasing contacts and congestion throughout the river corridor? The ramifications of this are enormous in terms of congestion on the river and ultimately negative impacts to the river experience. These questions must be answered, and accountability must be built into the plan as it relates to administrative use of the river corridor.

GCRG believes that the possible impacts of increased use on the degradation of beaches deserves special mention. This concern is a serious one, since the quantity and size of beaches are continually declining in the sediment-starved Colorado River system. As beaches shrink and disappear, users have fewer places to camp. As use of the remaining beaches increases, erosion accelerates. Reduction in the number and size of beaches will increase crowding, congestion, and competition for campsites, even if use remains at its current level. A greater number of visitors, as proposed under Alternative H, will increase the amount of use these damaged beaches must sustain. Further, not only have the number and size of Grand Canyon beaches continually decreased, but their quality has declined as well. This decline in quality can result in more people heading up into the old high water zone, as well as campsite modification by river users. This too has significant implications when coupled with the increase in overall use that the preferred alternative proposes.

The large increase in use proposed in Alternative H will also affect the quality of the visitor experience. As we stated in our previous scoping comments, "...continually increasing the numbers of visitors is detrimental to the wilderness experience and infringes upon the opportunities for solitude and reflection that the Grand Canyon uniquely affords." We additionally contend that there is a distinct link between impacts to the physical resource and its effects on the visitor experience.

On a related note, Grand Canyon is the "workplace" of commercial river guides. The qualities of the canyon and the river create the quality and safety of a river trip. If guides don't love what they do, and if they feel that their "workplace" is compromised or degraded, it will be difficult to retain the quality of river guides that we currently have, which in turn affects the safety of the river-running public. Guides have already watched the quality of various resources deteriorate over the last decades; imagining an accelerated decline is an unsavory prospect to these important stewards of the canyon.

The Officers and Board of Directors of Grand Canyon River Guides assert that an increase in overall use is not acceptable if we are to protect canyon resources and preserve the quality of the river experience. These two GCRG goals are reflective of the park's own mission, its *Management Policies 2001*, and the National Park Service Organic Act of 1916; however, we believe that Alternative H falls very short of meeting these objectives.

GCRG asks that the park service retain the current level of overall use. There are no data to support the acceptability of a significant increase: the existing limits of acceptable change have not been clarified, and have been largely ignored. **Any adjustments to allocation and access should be made within the current level of overall use until it is clear that the physical and social carrying capacities of the river corridor will not be compromised.** Political

expediency should not be the driving factor behind major management changes –such a choice sets a dangerous precedent for future management plans. Once use is increased, it will be virtually impossible to "take it away," should negative impacts become too severe to effectively mitigate.

GCRG understands that retaining current use levels while balancing inequities in allocation could result in fewer employment opportunities for commercial river guides. Grand Canyon and the Colorado River are simply worth it.

GCRG also asks that planning and funding for monitoring and mitigation be made an integral part of the management plan. Any changes in use, particularly those that are likely to have an adverse effect on the resource, *must* be contingent on adequate funding and planning for monitoring and mitigation.

GCRG also asks that the handling of administrative use be considered within this visitor use plan, even though restrictions on that use are not encompassed within the plan. Some degree of clarification should be made especially as it relates to possible crowding and congestion in peak seasons.

REDUCTION IN TRIP LENGTH AND DIVERSITY

P. 52: "Maximum Trip Lengths (in number of days)" and p. 51: "Carrying Capacity Standards"

Many boaters would like even longer trips than are available today, yet Alternative H opts for more people having shorter trips. This is a very real trade-off that decreases the quality and diversity of available river trips.

Shorter trip lengths mean less user discretionary time for the individual user. In Alternative H, the UDT concept is used to present the increase in overall use as a positive factor. But the increase in UDT is a direct result of the increase in user days, resulting, as we argue above, in more serious damage to the resource. Meanwhile, the overall increase in UDT conceals the reality that under Alternative H, individual users will have *less* discretionary time on their trips, due to shortened trip lengths. Furthermore, a reduction of UDT will concentrate use at the "can't miss" sites, which in turn will exacerbate crowding and congestion throughout the river corridor.

Additionally, the reduction in the maximum trip length for motor trips essentially gets rid of hiking and kayaking trips with motor support.

Shorter trip lengths will have other serious repercussions for the quality of the visitor experience, noncommercial trip safety, and duration of trip-to-trip contacts, as described in detail in the visitor use and experience portion of our comments.

If the objectives of the General Management Plan, a guiding document for the revision of the CRMP, are to provide "outstanding opportunities for solitude or a primitive and unconfined type of recreation" as well as "allowing visitors to experience the river on its

own terms” it follows that shortening and homogenizing trip lengths, and reducing the flexibility and sense of freedom that river trips provide, is antithetical to the Grand Canyon river experience.

GCRG asks that the park service retain (or increase) trip length, and type diversity.

The reduction of options in these areas detracts from, rather than enhances, the quality of the river experience available to recreational users. Specifically, we would like the park to grandfather in the longer length motor trips (while not allowing more than have been run in previous years). This stipulation would continue to allow special length hiker or kayak support trips.

TIMING OF MOTOR SEASON

P. 53: “Mixed Use/Non-motorized Seasonal Use”

A six-month non-motor and six-month mixed-use model seems equitable and fairly workable, but the March through August mixed-use period is problematic. GCRG is concerned that the 30% reduction of motor launches during the summer months will increase the prevalence of two-boat trips in the summer if outfitters don't sell enough of their trips in March and April. This shift will mean more big trips looking for larger campsites. (Currently, more than one out of three motorized trips are one-boat trips; when the crew sleeps on the boat, which is typical, one-boat motor trips have the same footprint as a non-commercial trip, and don't need a large campsite every night.) Further, if the park contends that group size contributes to the degree of impact on cultural and natural resources and has the most effect on a visitor's perception of crowding, this issue should be revisited.

GCRG concurs with the joint agreement between GCROA, GCPBA, American Whitewater and the Grand Canyon River Runners Association to modify the river use seasons proposed in Alternative H. Specifically, we agree that the mixed use period should run from April 1 to September 15, with the no-motor period from September 16 through March 31st. However, we suggest a more meaningful definition of the "no motor" season: Sept 15th should be the last day any motor trip could be on the river above Diamond Creek. The "mixed use" and "no motor" seasons, consequently, would refer to the presence, or absence, of motorized craft above Diamond Creek, rather than launches at Lees Ferry. Under the current interpretation, the beginning of the "no motor" season could be more appropriately called the "no more motor launch season," as motor trips can continue through the canyon until nearly the end of September. Some people come on September trips expecting that they won't see motor boats after Sept 15th, and are disappointed when they see them above Diamond Creek for as much as two more weeks.

ASSUMPTIONS ABOUT CAMP CHOICES

P. 52: “Maximum Group Sizes... a new group size of 8 (small) would be offered to better distribute groups along the river.”

GCRG does not believe that a rule requiring small trips to use small campsites is workable, for several reasons. First, it depends upon self-enforcement, and some non-commercial trips may be unwilling to cooperate. Second, some non-commercial trips may have problems reading a map or determining which campsites are the ones they are supposed to use. Third, campsites are in a state of flux in the canyon, and change from day to day because of river or thunderstorm erosion, rock falls, and other factors: the "official" list in Appendix C. on Soils is a hodgepodge of old and inaccurate information. No list can remain accurate and current for long; an inaccurate list, in the hands of inexperienced boaters, is worse than none at all. Fourth, the current system of "first come, first served" works well and encourages everyone to plan around the possible and probable activities of other groups, and have backup plans. Fifth, although this is not specified under Alternative H, for the "small trips, small camps" scenario to work, it would require larger trips to bypass designated small camps when they may have legitimate reasons for wanting to use them, including wind, weather, water flows, boat repairs, medical emergencies (including evacuations), and other unforeseen circumstances. And finally, this rule would create expectations about the availability or non-availability of particular campsites that would, at least some of the time, not be met: the current system of "first-come first-served", and "Plan A, Plan B, and Plan C" is better.

GCRG suggests that Grand Canyon National Park abandon the plan to require certain size groups to camp at like-size camps. Instead, retain the current system of "first-come-first-served" and ensure the flexibility that river trips through Grand Canyon need.

RIVER TRIP SIMULATOR

The use of the River Trip Simulator model is a concern when it seems to have been used as an answer rather than as a tool, resulting in homogenized trips, reduced flexibility, and more rigidity (such as designated campsites for certain size trips). We contend that because the RTS is based on camping beach studies conducted in the early 1990's rather than the current state of Grand Canyon beaches (in terms of size and campability), the model used to formulate your assumptions is inaccurate. Furthermore the RTS model is based on behavior under the rules regarding activities at attraction sites, and campsite conditions as they existed before the RTS was developed. The new rules and restrictions proposed within this plan will invalidate the RTS projections of trip interactions because guides will make decisions about campsites and daytime activities based upon the new rules and current campsite conditions, and not the decisions projected by the RTS. For this reason we question the reliability of RTS for predicting the behavior of river trips, and their impacts, under Alternative H.

Natural Resources (Chapter 4 pp. 230-539)

Public scoping sessions for the Colorado River Management Plan identified the protection of ecological and cultural resources as the National Park Service's first management priority (Appendix B, page 5 of 12). While Grand Canyon River Guides agrees that smaller group sizes will have a beneficial impact on a number of resource issues (Soils, Water Quality, Natural Soundscape, Vegetation, Cultural Resources, Visitor Use and Experience, etc) we disagree with the conclusion that a large increase in overall use levels is consistent with protecting resources in the Grand Canyon. Many impacts are a result of cumulative use. Soil compaction, depletion of cultural artifacts, damage to vegetation, wear and tear on campsites - to mention a few - increase in direct proportion to the number of people using the canyon.

The Board of Directors of Grand Canyon River Guides has well over one hundred years of combined experience in the canyon, amounting to more than 500 trips. The continued degradation from recreational use and dam-related impacts has been evident and experienced first-hand. Alternative H was designed to markedly increase overall use to satisfy perceived demand, mitigating impacts by evening the launch distribution, and reducing group sizes and trip lengths. An increase in the number of user days will only accelerate the rate at which these impacts accumulate.

Any use level implies some wear and tear on the natural resources of the Grand Canyon; consequently, any plan that allows for recreational opportunities implies that some resources will suffer from the human impacts. Grand Canyon River Guides believes that it is irresponsible to accelerate these impacts by planning such a large increase in use levels merely to appease vocal demands for more use.

Concern #1: Mitigation measures are unfunded.

The approach proposed to control impacts to natural resources is deficient. The DEIS says that

"specific measures can be effective in reducing impacts to (specific resources) if adequate funding, staffing, monitoring and implementation of the measures are maintained" (pages 466 and many other places).

This general wording is included under the "Mitigation of Effects" section for soils, terrestrial wildlife, aquatic resources, vegetation, air quality and cave and paleontological resources. Furthermore, the Executive Summary of the DEIS states,

"Subject to the availability of necessary funding, the National Park Service will develop a monitoring and implementation plan once a revised Colorado River Management Plan has been approved" (Vol 1, page xi-xii).

GCRG finds it unacceptable that the continued protection and preservation of the natural

resources of the Colorado River corridor through Grand Canyon is contingent upon not-yet-received funding, rather than an integral part of the proposed management plan. No mention is made of what these funding sources might be, nor is there any mention of what happens if the funding does not materialize. We agree that,

“Reasonable mitigations are those that could be implemented under conceivable foreseeable operating conditions and would not cause substantial adverse effects to other resources (cultural or natural resources or visitor experience).” (page 221)

The probability, however, of receiving funding sufficient to mitigate negative effects to natural resources and keep them within acceptable levels may be problematic and tenuous at best. This is not a trivial objection; in discussing the status quo (Alternative A) the DEIS mentions that,

"The limits of acceptable change in the 1989 Colorado River Management Plan state that there will be no more than one primary trail from a mooring location to a destination site, through the old high-water and desert (uplands) zones per site. The National Park Service has attempted to block and revegetate unwanted trails; however, due to a lack of funding and resources, these efforts have been minimally successful" (page 238).

Grand Canyon River Guides believes that, because the “conceivable foreseeable operating conditions” do not include the “availability of necessary funding” suggested mitigations reliant on such funding and necessary to keep impacts from impairing the resources of the park are not reasonable.

[Note: see our related comments under "Park Operations".]

The Vegetation section under Natural Resources states,

"Mitigation would be required, with large increases in staff and funding necessary to implement the measures. Even with these increases, mitigation measures would be unable to reduce the adverse impacts from recreational use to negligible levels in the new high-water zone, old high-water zone, or upland areas"(page 433)

and yet in direct contradiction with this statement, the Park's conclusion states that,

"Alternative H would not result in the impairment of vegetation resources in Grand Canyon National Park" (Page 433).

This latter statement is not defensible when viewed against the significant import of the first observation.

Concern #2: The approach to considering the effects of dam operations and the reliance upon an undefined “adaptive management approach”

GCRG must also emphasize that Glen Canyon Dam and its profound effects on the downstream environment cannot be ignored — especially in terms of the significant loss of camping beaches, serious vegetation encroachment, and the degradation of sensitive xeric environments and irreplaceable cultural sites. The DEIS determines the “number, size, distribution, and expected lifespan of camping beaches” to be primary factors determining carrying capacity on the river (page 8). The DEIS also lists a number of assumptions that were used in evaluating the effects of recreational use alternatives. The assumption regarding beaches states,

“The diminished sediment load in the river below Glen Canyon Dam has resulted in, and will continue to result in, an overall reduction in the total number of beaches and individual beach sizes” (Chapter 4, page 225).

These two statements taken together effectively undermine the park’s assertion that the increase in overall use as proposed in Alternative H is justified or even workable. This is compounded by a number of factors: 1) Grand Canyon National Park is only one of twenty-seven stakeholders in the Adaptive Management Program governing the operations of Glen Canyon Dam. 2) The Adaptive Management Program by its very nature is slow and ponderous with water and power interests outweighing those who advocate on behalf of recreation and the environment. 3) Positive gains in sediment through Beach Habitat Building Flows (BHBF) or Habitat Maintenance Flows (HMF) have been short-lived, while the riverine environment in Grand Canyon continues to experience an overall net loss in vital sediment. 4) In fact, pre-dam beaches are irreplaceable short of re-engineering the dam.

The operations of Glen Canyon Dam may lie outside the scope and purview of the Colorado River Management Plan, but the impacts of these operations are very real and long-term with significant implications for recreation management. Consequently, responsible management of these impacts on recreation does lie within the scope of the DEIS. We suggest including in the EIS a review of what management actions the park intends to take in regard to the operations of the dam, vis-a-via park involvement in the Glen Canyon Dam Adaptive Management Program. Furthermore, under Alternative A, the park should delineate its past attempts at fulfilling its mission through the program and the results of those attempts. The park should be held accountable by the public, as well as by itself for the public, for its actions in this very important process.

Furthermore, while we concur with utilizing an "adaptive management approach" as a means to evaluate the state of specific resources, identify mitigation measures, and take action where needed to protect park resources, there are no details within the DEIS and no guarantee that measures can be implemented quickly enough to forestall lasting negative effects on the resource(s) in question. Indeed, what the park intends by an “adaptive management approach” is not elucidated. Would it be a program similar to that of the Glen Canyon Dam Adaptive Management Program with stakeholders contributing to decision-making, or simply the park management tweaking the plan to soothe the squeaky wheel? (“Adaptive management” is mentioned in various places. See especially statements in the Executive Summary, pages xi-xii, under “Monitoring and Implementation Plan” and in Chapter 1, page 18, under “SCOPE OF THIS ENVIRONMENTAL IMPACT STATEMENT.”)

Concern #3: Revision of the Limits of Acceptable Change

The DEIS indicates (Vol 1, pages xi-xii) that the "limits of acceptable change" (as defined in the 1989 CRMP) will be revised in accordance with the revised management plan (page 415). To reiterate Grand Canyon River Guides' CRMP scoping comments from 2002,

"Appropriate research must be done to determine the carrying capacity of the river corridor, both environmentally and socially within the definition of the limits of acceptable change. Until such a study is completed, simply increasing allocation to satisfy demand may have negative and lasting repercussions for both the canyon resources and the visitor experience. It is imperative that any increase in allocation be justified in terms of compliance with both carrying capacities".

We do not agree that revision of the LACs should be based on the carrying capacity proposed in Alternative H. The point of having specified limits of acceptable change is to trigger management changes to protect resource values. The DEIS has this exactly backwards: the management plan is being used to trigger revised criteria for resources protection. The current quality of canyon and river resources must not be further compromised. Once increased use is granted, it will be virtually impossible to "take it away" should impacts exceed the limits of acceptable change. This difficulty provides a disincentive to adhere strictly to the LACs.

Taken together, these concerns lead us to believe that the conclusions drawn from the impact analysis of the natural resources section as defined within Alternative H are inconsistent with the act establishing the National Park System, which charges the NPS to leave it "unimpaired for the enjoyment of future generations."

Grand Canyon River Guides offers the following **suggestions** to build accountability and functionality into the process as it relates to the preservation of the natural resources of the Colorado River corridor through Grand Canyon:

- 1) Ensure all funding sources necessary for the proposed monitoring and implementation of this plan. Essential funding is a critical component for the protection and preservation of ALL resources identified within this plan, and is a common element of all alternatives encompassed within the CRMP. Traditionally, monitoring programs are often the first to get cut when budgets are tight, but they are absolutely necessary in order to provide a defensible basis for future management actions. Funding must therefore be absolutely guaranteed if this plan is to be successfully implemented regardless of its final form.
- 2) The final plan must say what will happen if funds for implementation and monitoring don't materialize. It must be explicitly stated that any increases in use are conditional upon an ability to monitor the impacts of the changes, and that the NPS opposes making changes if they are unable to track impacts in order to meet their responsibility for resource protection.
- 3) A detailed monitoring/implementation plan should be part of and encompassed within this management plan, and subject therefore to public review and comment. It must also

be absolutely clear what the park is “managing for” as it pertains to individual resources in Grand Canyon National Park in order to determine when conditions are approaching, at, or outside of standards. This articulation will provide a specific mechanism for accountability and compliance beyond the document itself.

- 4) Additional monitoring assistance could be provided by specific educational or non-commercial trips with oversight provided by the Park Service. Such a program will result in several distinct benefits: building resource knowledge within river stakeholder groups, providing additional (no cost) assistance for monitoring duties, and investing river users with a sense of stewardship and advocacy.
- 5) Use should not be changed outside of the limits of acceptable change and the carrying capacity of the river. Delineating and adhering to the 1989 Limits of Acceptable Change and disseminating that information to user groups will build in accountability while ensuring that the park resources are adequately protected and preserved.
- 6) Include in the EIS a review of what management actions the park intends to take in regard to the operations of the dam, vis-a-via park involvement in the Glen Canyon Adaptive Management Program.
- 7) Education should always be the first line of defense as it can negate the need for increased enforcement.

Cultural Resources (Chapter 4 pp. 540-577)

As the DEIS points out so aptly in the Cultural Resources section,

“Because most cultural resources are nonrenewable, even small incidents of visitation can diminish the resource.” (Page 546)

The nonrenewable, irreplaceable nature of the rich cultural sites and traditional cultural properties of Grand Canyon elevates the importance of their continued protection and preservation to a critical level. There is no “We’ll try” here; it is imperative that the park achieve its objectives for this resource. Grand Canyon River Guides has a number of observations and concerns that we would like to share the park.

Concern #1: The overall increase in use as proposed in Alternative H will surely be detrimental and its impacts will become cumulative and possibly irreversible as they relate to the cultural resources in Grand Canyon.

This point is reinforced by the fact that cumulative negative impacts are already occurring under current use levels. Many of the same concerns that we expressed elsewhere in our comments also apply here: the increase in non-commercial sector use, the bulk of that use occurring in the winter season, and the reduction in individual user discretionary time which may actually increase congestion at “must see” sites.

Not only are these cultural resources non-renewable and irreplaceable, but they are also an integral part of the prehistoric record of the Colorado Plateau. Therefore, categorizing impacts

as localized (“restricted to specific sites” as per your definition on page 544) is misleading, since any damage or loss to individual cultural sites in Grand Canyon will impair the understanding of the archaeological record of the entire region. In other words, site-specific damage has ramifications far beyond the site itself.

The conclusion of the impact analysis section for cultural resources (for Alternative H) states that,

“Adverse effects from visitation to nonrenewable cultural resources would continue to be measurable, and at times impacts to individual resources would be moderate to major.” (page 565)

Both of these intensity descriptions entail the loss of overall integrity to the site(s) in question. This loss is simply unacceptable, especially when viewed in light of the increased access Alternative H proposes and the regional implications we indicated above.

Although GCRG concurs that factors such as reductions in group size and evening out launch schedules may help mitigate some of the potential impacts to cultural sites, we feel these measures are insufficient to offset the aforementioned concerns as well as those detailed below.

Concern #2: The existence of Glen Canyon Dam will continue to impact the cultural resources of the Grand Canyon river corridor into the foreseeable future, yet no mechanism exists to tie the CRMP into the Adaptive Management Program governing dam operations.

We agree with the assessment in this DEIS that

“The most significant action that has affected, and will continue to affect, the cultural resources along the mainstem of the Colorado River is the operation of Glen Canyon Dam.” (Page 545)

The DEIS also acknowledges that the dam has long-term, cumulative effects that are directly related to visitor access and use of the river corridor (Page 547). The Adopt-a-Beach monitoring program implemented by GCRG in 1996 provides the following observation:

“Lack of a lower camping area will inevitably force camping and recreation into higher zones and into the more fragile xeric desert zone where many archeological sites are located.” (Adopt-a-Beach Executive Summary of Results for Years 1996-2003)

This observation is of significant import linking as it does the continued erosion of the sediment resource to potential negative repercussions for the irreplaceable archeological sites along the river corridor. We contend that due to the existence of Glen Canyon Dam, the degree to which we can maintain the health of the cultural resources in Grand Canyon is already tenuous. Yet, this is a resource that simply cannot be compromised in any way due to its nonrenewable nature. The park must regularly share research and data with the Adaptive Management Program (and with the Grand Canyon Monitoring and Research Center) so that the AMP can be alerted when

resource conditions are approaching unacceptable levels. Sediment is not only necessary for the camping beaches and riparian environment of the river corridor, it is also vital for the preservation of these archaeological sites and it must be articulated as such by Grand Canyon National Park.

Concern #3: The cultural sites, activities, and values of Grand Canyon river runners need to be acknowledged and recognized under the final plan.

GCRG concurs that

"Cultural resources include archeological and historic properties, as well as traditional cultural properties, ethnographic resources, and cultural landscapes." (Page 540)

However, the concept of "cultural resources" should be expanded to include the resources valued by the culture of Grand Canyon river runners, in addition to traditional Native American cultures. Unlike Native American tribes, Grand Canyon river running culture is specific to the Grand Canyon: ALL of this group's sacred and traditional sites lie in the canyon, and along the river corridor. Our written tradition about specific sites - generally called "attraction sites" in this plan - began with Major Powell's account of his trip in 1869, and continues up to the present, and includes dozens of books and thousands of articles.

Our cultural presence is, in fact, the entire reason for this plan. We also want access to our traditional cultural resources and do not agree that our active involvement with our culture should be curtailed any more than we would want to impose similar restrictions on Native American tribes. GCRG, on behalf of the river running community, is thus very concerned about increased use that might require closures of sites that are central to our cultural heritage.

Concern #4: Adequate funding sources to staff, monitor and implement this plan may be tenuous and problematic.

In the Cultural Resources section, the DEIS states

"to sustain current mitigation levels, more staff is needed to maintain the completed work" (page 545)

Inadequate staffing levels, coupled with the qualifying statement in the executive summary of the DEIS that a monitoring and implementation plan will be developed post-CRMP, but subject to available funding, most certainly do not indicate that the new plan will make any improvements in this area.

Concern #5: The limits of acceptable change from the 1989 management plan may not be thoroughly understood or currently adhered to as they relate to these irreplaceable cultural resources.

Cumulative negative impacts have already been occurring, and there is absolutely no evidence

that this deterioration will not continue and/or increase. We recognize what a challenge it is to determine how much decline or change is acceptable. However, redefining the LACs after significantly increasing overall use (as proposed in this plan) effectively divorces these two concepts from one another. This plan should build and ensure accountability – define what the standards are, adhere to them, articulate those standards to the public, and draw everyone into the active preservation of these non-renewable resources. Education and monitoring are far preferable to more regulations and enforcement, (or even some of the suggested mitigation measures such as interpretive trails, signs, or site restrictions that detract from the “level of naturalness” and therefore adversely affect the quality of the river experience). Let’s prevent the cure from being worse than the disease.

Grand Canyon River Guides would like to offer the following **suggestions** as they pertain to the cultural resources in Grand Canyon:

- Retain the current level of overall use and work within those parameters to further protect and preserve these irreplaceable resources.
- Grand Canyon National Park must strengthen and renew their commitment to successful preservation of the Park’s cultural resources.
- Ensure all funding and staffing necessary for successful monitoring and preservation of these nonrenewable cultural resources. If staffing is currently insufficient, it should be immediately augmented and ensured over the long term to meet all needs as they grow and/or change.
- Develop a detailed monitoring/implementation plan for cultural resources as part of and encompassed within the CRMP, and therefore subject to public review and comment. This builds accountability and compliance beyond the DEIS itself.
- Retain and improve the ranger orientation at Lees Ferry for non-commercial river trips. A video/movie is not a sufficient tool because there would be fewer opportunities for questions and discussion. Adding a video either prior to or after a ranger talk would be acceptable and perhaps optimal as it would provide an instructional visual component. A well-rounded and informative ranger orientation is an essential educational tool that has great potential to mitigate negative effects to the resource.
- Tie the CRMP to the Adaptive Management Program and improve communication with that federal advisory committee as it pertains to the needs and concerns of the cultural resources program in Grand Canyon National Park. It is unacceptable that impacts from the dam on downstream resources are continual and long term, yet they remain outside the scope of the CRMP.
- The Colorado River Management Plan must acknowledge the cultural sites, activities and values of Grand Canyon river runners; access to these sites, activities and values must be maintained, consistent with the other objectives of the river management plan.
- Insist on absolute adherence to the 1989 limits of acceptable change as they relate to the irreplaceable and nonrenewable cultural resources in Grand Canyon and tie them specifically to an accurate (and current) assessment of carrying capacity.
- Standards for cultural sites in Grand Canyon should be articulated to the public at large, which in turn ensures accountability and aids compliance.

- Characterize impacts to the cultural resources in Grand Canyon as “regional” rather than local. This elevates their importance to the level necessary for their continued protection and preservation.

Visitor Use & Experience (Chapter 4 pp. 578-665)

While some aspects of Alternative H are improvements (smaller maximum group size, for example), the overall quality of the visitor experience and the recreational values that are encompassed within that experience will be seriously compromised under Alternative H. This is antithetical to Grand Canyon River Guides’ goal of providing the best possible river experience and it should be a paramount consideration for the Grand Canyon National Park itself in this visitor use plan.

Grand Canyon River Guides’ primary concerns as they pertain to visitor use and experience are as follows:

Concern #1: Shorter trip length will have numerous negative repercussions for the visitor experience.

According to the Park’s own research, many visitors would prefer trips that are longer, rather than shorter. This is clearly outlined in the following quote from the DEIS:

“In terms of the level of importance to visitor experience, the ‘length of time traveling through an undisturbed environment’ was the third highest ranked distinguishing feature of a Grand Canyon river trip. Data show that nearly one-third of commercial passengers and 51% of noncommercial users felt their trip lengths are too short under current management... (p.591)

The only features of a Grand Canyon river trip ranking higher than trip length were “geologic formations” and scenic views” – static features which are inherent to Grand Canyon. Other important recreational values identified in the same research, include the ability to explore, sense of freedom, and opportunities to experience solitude “(minimal contact with people outside one’s own group)” as outlined in Chapter 3, Visitor Use and Experience, pages 164-165.

Grand Canyon River Guides feels that the shorter trip lengths and the resulting “homogeneity” of river trips as proposed in Alternative H are not an acceptable trade-off to make the significant increase in overall use workable. We feel that shorter trip lengths will result in numerous and serious negative repercussions for the quality of the river experience as follows:

1. Shorter trip lengths negatively affect the sense of freedom that trip participants have by reducing the time available for exploration and limiting the opportunities to experience solitude. Of these recreational values, the GCRG Board of Directors identified the “sense of freedom” as perhaps the paramount concern because the other values stem from it or are directly affected by it. In this case, sociological perceptions are negatively impacted by a mitigation measure (shorter trip length), thereby compromising the end goal of properly maintaining a quality river experience. A sense of freedom and spontaneity that

a Grand Canyon river experience provides are unique in American society today and simply must be preserved rather than devalued. These recreational values are also integral to the integrity of the “wilderness experience” that a Grand Canyon river experience is charged to provide. This is a rare commodity and must be preserved at all costs.

2. Additionally, under Alternative H, “Attraction site encounters would be slightly higher than current levels in summer although the sizes of groups encountered would be smaller” (p.622). The opportunities for solitude, another necessary aspect of visitor experience, reduce proportionally as the likelihood of encounters at popular attraction sites increases.
3. As we will discuss in more depth under “Duration of Contacts” below, shortening the trip length to sixteen days for self-guided trips will put that length more in line with that of a typical length of a commercial trip. This has serious ramifications for the practicality, flexibility, safety and therefore the quality of river trips. Experienced commercial guides, when confronted with another trip launching on the same schedule, routinely work out among themselves the details of which trip will go ahead, and which will fall behind, to minimize this sort of problem. The increased frequency of trips launching on the same schedule will seriously diminish the possibilities for commercial trip leaders to avoid the impacts of repetitive contacts with others traveling on the same schedule. Furthermore, lacking the necessary experience, few non-commercial trip leaders will be able to deal with this problem effectively – they simply require the extra time for their learning curve. (For example, they may need to stop and scout rapids more frequently). By reducing the length of the non-commercial trip to sixteen from eighteen days, you take away the flexibility that both groups need, while compromising the safety of these trips. Education can certainly help, but not sufficiently to mitigate the problems that reduction in trip length will engender.

Concern #2: Duration of contacts between groups will have numerous negative consequences for the quality of the river experience.

Although a direct function of shorter trip length, our concern regarding the consequences of the duration of contacts will be discussed separately here as we believe its importance is not adequately considered in the DEIS. Under the status quo (Alternative A) very few commercial trips are as long as a typical non-commercial trip. (Reference: handout entitled How Alternative H Trip Lengths Compare to Actual Use). Under Alternative H, which restricts non-motorized summer season trips to sixteen days, the lengths of longer non-motorized commercial trips will be similar to the length of the typical non-commercial trips. According to the chart on the above-mentioned handout, about one out of six non-motorized commercial trips is currently 16 days or longer, while about 2 out of 3 non-commercial trips are at the maximum length of 18 days. Consequently, changing the maximum summer trip length to 16 days means that most of the time when a long (16-day) commercial trip launches, it will launch with a non-commercial trip on the same schedule.

The section on contacts (Appendix G: Visitor Use and Experience page G-1, River Encounters) refers to the “direct, short-term, localized” impacts of river encounters. That is the condition

under the status quo, where most trips launching together are traveling at different rates through the Grand Canyon. Under Alternative H there will be a significant increase in the number of trips traveling at the same rate of speed: most 16-day commercial trips will launch with at least one 16-day non-commercial trip. Every other day, a small non-commercial trip will also launch with a regular sized commercial trip. On some days, consequently, there will be as many as three trips launching on a schedule of 16-day to Diamond Creek. The chances of this happening under the status quo (Alternative A) are remote, at best.

It is difficult to express adequately the degree of negative impact this circumstance will have on all of these trips. Contacts today are more tolerable than they will be under Alternative H because most of the time, you only contact the same group once (when one trip passes the other), or on occasion you might see the same trip several times in a day or two, but then one trips gets ahead and the other falls behind. Under the status quo, subsequent contacts are with different groups and are generally brief. Consequently, they have a “novelty value” that makes them more tolerable.

In contrast, under Alternative H most of the longer trips, whether commercial or non-commercial, will find themselves playing tag for their entire trip with other groups that they launched with at Lees Ferry. Since all groups will be headed to the same scenic attractions, on the same overall schedule, it is likely that they will have repeated contacts with each other, as well as numerous opportunities to compete for camps with the same groups each day. This will greatly detract from the visitor experience on all trips that find themselves in this unfortunate situation. In short, the social perception of the contacts (“novel” vs. “repetitious”) is an important distinction and directly impacts the quality of the experience. This appears obvious to experienced river runners, but is not noticed by the RTS model.

The plan to have small non-commercial trips camp in designated small camps will have but limited impact on this problem, since those trips, each day, are likely to visit the same scenic attraction sites. While trips may be out of sight of each other at night, they will be omnipresent during the day. According to Appendix G: Visitor Use and Experience, page G-5, “Most boaters prefer visiting attraction sites by themselves, or to share them with few other people.” Seeing the same people day in and day out will severely degrade visitor’s Grand Canyon experience.

Seeing the same people continuously over the course of the trip will be worse than having the same number of encounters with different groups, for several other reasons as well. First, repeated competition for campsites and private time at attraction sites will lead to conflict and animosity between visitors who have expected a “wilderness-like” experience. Second, the “social integrity” of groups will be seriously compromised by seeing the same groups day in and day out. River trips - both commercial and non-commercial - normally engender a special bonding among trip members that contributes greatly to the experience. This shared experience is an important connection as it maintains the love of Grand Canyon and the Colorado River over time. Blurring of this group identity, or social integrity, will be a consequence of too many, too frequent contacts with the other groups traveling on the same schedule. This intangible, but extremely significant, aspect of extended river trips is well known to all guides, repeat non-commercial boaters, and experienced commercial passengers alike; it is one of the things that makes a Grand Canyon river trip a “trip of a lifetime” for many participants. Alternative H will destroy one of the more significant aspects of the visitor experience for trips that are forced to travel on the same schedule.

Concern #3: Increased use as proposed in Alternative H will compromise the level of naturalness -- another important recreation value identified by the park's sociological research (page 165).

The DEIS states,

“Although there are human-caused impacts associated with Glen Canyon Dam, upstream water development, and invasive exotic vegetation, the canyon’s environment appears largely shaped by the forces of nature, not humans.”(page165)

Unfortunately, this is less true every day especially with regard to the section of the river corridor experienced by river runners. “Natural resources” implies, above all, the concept of “natural” - but this plan’s micro-management and intervention in the details, in the name of “mitigation,” ensures that many resources will be perceived as “unnatural”, directly compromising the park’s obligation to ensure a wilderness standard by managing to preserve wilderness values and character. In fact, the vision statement adopted from the General Management Plan (and revised based on public scoping sessions and comments during this process) incorporates the following key elements:

- Management designed to provide a wilderness river experience, and
- Protecting and preserving the Colorado River corridor in a wild and primitive condition. (page 580).

GCRG fails to see how Alternative H will achieve this overarching vision. Many beaches, campsites, trails, and archaeological sites - to mention a few resources - have already been modified by the NPS in the name of “mitigation.” The DEIS plans to escalate the modification of the natural resources of the Grand Canyon, in direct conflict with the level of naturalness value identified as desirable by visitors. For example, under “Cultural Resources, Mitigation of Effects” we find proposals for

“...active management (guides, education, interpretive trails and signs) of popular sites” (page 545)

Under the natural resources and vegetation sections we find proposals to

“Delineate and stabilize campsites and trails, harden selected sites, and clear native and nonnative vegetation to create campsites in the new high-water zone.

Maintain or construct trails....

Build and/or maintain erosion control structures...

Re-contour ground surfaces...” (page 416)

We believe that further “improvements” in the Grand Canyon - however justified - will continue to detract from the level of naturalness and vital wilderness qualities perceived by visitors, and therefore severely detract from the visitor experience.

And finally, under the natural resources and water quality sections we find a mitigation proposal to

“Restrict or deny access to areas that routinely exceed water quality standards due to human activity and/or that pose a risk to human health and safety. Closures could be temporary.” (page 268)

At times during the monsoon season, the mainstream of the Colorado River probably does not meet public health standards for full body contact, yet this is a natural condition. The DEIS apparently considers closure as an acceptable mitigation measure to prevent visitors from experiencing this natural condition.

The park acknowledges in the DEIS that the definition of “wilderness river experience” includes the following component: “...visitors accept an undeveloped, primitive environment and assume the potential risks and responsibilities.” (page 580). The mission statement of Grand Canyon River Guides’ echoes these same sentiments. GCRG believes there is a point after which the river experience becomes too heavily managed, too homogenized, and too sanitized. Alternative H with its increased overall use and shorter trips may cross this line by ignoring the “level of naturalness” that is an integral part of the Grand Canyon river experience.

Concern #4: Proposed restrictions, closures, additional regulations and enforcement will adversely affect the Grand Canyon river experience.

Additional restrictions and closures (Little Colorado River, Tapeats Creek, Kanab Creek – Page 31) and proposals to close Vasey’s Paradise and Elves Chasm (page 514), and to limit or ban driftwood fires in the winter season (page 445), will significantly diminish the sense of freedom available under the current river management. Additional rules, regulations and enforcement measures have this same affect. While specific site restrictions will be thoroughly addressed in the Operating Requirements Changes section, we believe their overall net affect will be adverse as it pertains to the quality of the river experience. Our specific concerns as they relate to this topic are as follows:

- Too many rules and rules that seem to make no sense breed the increased likelihood of non-compliance.
- More education is always preferable to more rules. This also cuts down on the need for added enforcement – a mitigation measure that is undesirable as well as problematic from a funding and staffing standpoint. Enforcement, more than any

other trip-to-trip encounter, reminds visitors that their trip is in a controlled environment and not necessarily a true wilderness encounter.

- “Reasonable mitigation measures” as detailed in the DEIS (page 584), include words such as “restrict, designate, schedule, limit, reserve, delineate.” These very words are diametrically opposed to the Grand Canyon river experience, and the sense of freedom and wilderness experience it must provide.
- Much of the functionality of Alternative H is predicated on the premise that trip size and camp size would go hand in hand (large camps for large groups, etc...). This is tantamount to campsite scheduling, a concept that GCRG has strenuously opposed in the past and for good reason – it simply won’t work in Grand Canyon because the distances traveled per day are too far and factors beyond control such as weather, wind, dam flows and other unforeseeable events preclude it. And, if campsite designation won’t work, then Alternative H with its increase in overall use becomes unworkable and unfeasible as well.
- Alternative H provides non-commercial river runners with a significant increase in use, especially in the winter and shoulder seasons. A ban on using driftwood could become a safety issue.
- While we agree that requiring exchange passengers to begin their hikes out by a certain time (especially in the summer months) would be necessary for their safety, we question the move to require a hiking guide for exchange passengers. We do so for the following reasons: 1) The fitness level of passengers is all over the board with many passengers generally unfit for such a strenuous hike. 2) Requiring a hiking guide for exchanges could well encourage those who should not go, and marginal hikers, to attempt the hike, thereby adding to the problem rather than solving it. 3) Due to the varying fitness levels of exchange passengers, they may become spread out significantly – as much as several hours hiking time between some passengers. A hiking guide accompanying the group will quickly become a “running sweep” accompanying only those passengers who are the slowest and unable to help if there is trouble up the line. 4) This change would raise serious liability concerns for both outfitters and the guide leading the hiking exchange because those guides would be required/expected to help even though they might be an hour or more away from the problem. Guides are not protected under the Good Samaritan laws and are therefore open to litigation despite their inability to prevent problems or even to assist if situations do arise during these proposed hiking exchanges. This also puts the park at risk for having required the hiking accompaniment in the first place. Again, this raises many more problems than it solves. 5) There is also a point, as we mentioned previously after which you sanitize the wilderness experience too much by taking away the challenges of the experience. While we are all for improving safety, this particular measure seems unfeasible and unnecessary, and it actually increases rather than reduces liability concerns.

Concern #5: Any compromise in the quality of the river experience will result in the loss of advocacy for Grand Canyon and the Colorado River.

This concern must not be minimized or discounted. Generating the advocacy that this special place desperately needs is a direct function of both protecting Grand Canyon and the quality of the river (visitor) experience. A trip through Grand Canyon can be life altering and the advocacy that stems from that experience can be life-long as well, but only if the unique quality of that experience is carefully preserved. Simply put, it is imperative that these river users CARE. If they feel that their experience has been compromised or lessened in any way, it affects them negatively on both an intellectual and emotional level. Stewardship and advocacy go hand in hand, and they are precious commodities that must not be abandoned to political expediency.

Our general concerns about the quality of the visitor experience are deep and multi-faceted as we've discussed in this section. GCRG finds Alternative H to be far from the fairly rosy picture detailed in the impact analysis section. The real world implications of Alternative H as it pertains to the visitor experience, and the negative repercussions we perceive as a result, lead GCRG to offer the following suggestions:

1. Retain the diversity in trip lengths that we currently have to circumvent the many problems we foresee if trip lengths are reduced: compromised recreational values, lack of flexibility, safety concerns, increased contact duration, the breakdown of the social integrity of groups, etc.
2. Retain the wilderness character of the canyon and the "level of naturalness" that must be evident. Too much micro-managing and intervention will be noticed and will detract from the quality of the visitor experience.
3. Pay attention to your own research and the sociological values that are important to river users. This should serve as your guidance on these matters.
4. Minimize rules, maximize education and reexamine your "reasonable" mitigation measures, because many are not reasonable at all.
5. Abandon the idea of delineating campsites for certain size groups. Whichever way you look at it, it is indeed scheduling – a concept that the park tried to implement in the 1970's to broad and vociferous opposition from river guides who know that it is antithetical to the river experience and simply unworkable in Grand Canyon.
6. Don't compromise the quality of the visitor experience by bowing to pressure from those same user groups. If the canyon loses, we all lose. That is the bottom line.

Park Operations (Chapter 4 pp 698-725)

The management objective of the Colorado River Management Plan for Park Operations is to

“Ensure sufficient fiscal and human resources are available to implement the revised river management plan.” (page 699)

Meeting this new objective would require, **“short term funding for implementation and long-term funding to ensure that management objectives, including the protection of park resources and quality visitor experiences are met.” (page 699)**

GCRG finds the DEIS and specifically Alternative H, to be severely lacking in this regard. No concrete mention is made as to what these funding sources might be. The probability of receiving sufficient funding to mitigate negative impacts to the park resources is most unlikely.

The executive summary of the DEIS states

"Subject to the availability of necessary funding, the National Park Service will develop a monitoring and implementation plan once a revised Colorado River Management Plan has been approved. As part of this, the limits of acceptable change indicators and standards from the 1989 river management plan will be revised as appropriate. Also, if resource conditions change sufficiently to adversely affect recreational experiences (e.g., disappearing beaches), or if mitigation measures cannot be adequately implemented or are unsuccessful, the park may use an adaptive management approach to review and revise visitor use prescriptions in this river management plan." (Vol. 1 page xi-xii)

The suggestion that the NPS could, or would, decrease use levels to protect resources is unrealistic. Higher use levels have been approved in every management plan since the NPS decided to “stabilize” use levels in the early 1970s. The NPS has always increased use, rather than making responsible decisions about resource protection. This statement fails to address the legal, and moral, obligations of “...the park's enabling legislation and the legislation governing the National Park Service...” and the purpose of Grand Canyon National Park to,

- “preserve and protect its natural and cultural resources and ecological processes, as well as its scenic, aesthetic, and scientific values”
- “provide opportunities for visitors to experience and understand the environmental interrelationships, resources, and values of the Grand Canyon without impairing the resources.” (Both quotes from page 10)

The language “subject to the available funding” hardly seems to be a sufficient assurance at a time when national parks are severely under-funded. A telling quote from president’s column of the recent issue of National Parks and Conservation Association magazine states

“Some officials have repeatedly said that the Park Service is receiving more money than ever before. This past summer, administration officials toured the parks to

repeat this message. Although these statements are technically accurate, the modest increase has been more than eaten up by inflation, Homeland Security expenses, and mandated salary increases. Consequently, the money available to park superintendents has declined significantly.” (Fall 2004, NPCA magazine, page 3)

Yet throughout the DEIS, mitigation measures for all resources are predicated on available funding and staff to implement the measures. This is especially crucial due to the year-round use as proposed in Alternative H which could “exacerbate resource impacts compared to current conditions” (page 714).

In fact, the conclusion of this section states,

“Alternative H would require moderate to major changes from current conditions that would be apparent to park management and the public. This would result in adverse, short-to long-term, moderate impacts on park operations, requiring additional staff and funding to support visitor use management, routine monitoring, and resource monitoring programs.” (page 714).

We assume as you do that, “impacts to park management and operations are directly proportional to the level of visitation” (page 701).

Listed below are six factors which lead us to believe that Alternative H will have major adverse impacts on park operations as is portrayed in the DEIS:

- 1) Alternative H proposes a significant increase in overall use (28%).
- 2) The 28% increase in use is entirely in the non-commercial sector - a group which largely has less experience than the commercial sector, and therefore elicits a greater potential for negative impacts on the resource.
- 3) The heaviest increases come in the winter and spring months. This timing will automatically require more trip orientations and river patrols than currently take place.
- 4) The current lack of adequate staff to prevent adverse impacts to certain resources (such as nonrenewable cultural resources) would not indicate that an increased workload could be handled.
- 5) Significant additions to staff time and resources will be required to administer the new non-commercial permit system.
- 6) Much of Alternative H will add a tremendous administrative burden to the park, such as the proposed registration system for all river users.

Alternative H will require an enormous increase in staffing and funding. What is the proposed source of this funding? What are the consequences if this funding does not come through? As we have said before in our comments, once you have increased use levels, it will be virtually impossible to take that use away (or even a portion of it), even if impacts should reach unacceptable levels. If the park is to meet its own obligations to the resource and to the visitor experience, it does not make sense to change so many variables at one time and hinge the efficacy of the changed system upon something as

uncertain as funding. This is especially true when some of your current programs are stressed due to staff shortages, which must be a function of inadequate funding levels.

The park operations chapter of the final plan must explain how the park will meet its management objectives, including funding for implementation and monitoring, and elucidate what will happen if the funding fails to materialize.

LOWER GORGE ALTERNATIVES

Preferred Alternative 4 (Chapter 2 pp. 75-76)

Grand Canyon River Guides opposes the restriction of tow-outs for trips above mile 260, which will add at least an extra half day of travel time for oar powered trips traveling below Diamond Creek. We also oppose the limit to the number of trip pick-ups allowed per day. Each restriction could have serious, adverse, impacts on the visitor experience for these trips.

It would be more appropriate to let the operators of Canyon Jetboat Services determine where it is safe and reasonable to meet the trips they service, based upon water levels and sand bar problems in Lake Mead. Justification for this rule - sand erosion caused by motor boats - is absurd: the silt banks on Lake Mead are artificial, not natural, shorelines. In reality these deposits are lake bottom. Bank erosion caused by motor boats would be a more credible reason to close the river above Diamond Creek - and Marble Canyon, in particular - to motorized traffic, a course of action that was never under serious consideration in this plan. Another justification for this rule – wake creation at the Quartermaster area dock – is easily mitigated by speed controls that are already in use at virtually every boat launch and dock area.

The limit of four commercialized pick-ups per day during peak season and one per day during the non-peak season seems unjustified since problems other than the sand bar and wake issues mentioned above have not been identified. Variability of trip schedules and lengths could mean more than four trips arriving at Lake Mead pick-up locations on a given day. Additionally any problems (flash flooding etc.) occurring at Diamond Creek would add to the pick-up numbers downstream but are unaccounted for in the plan.

Grand Canyon River Guides' proposed solutions follow:

1. Allow the operators of Canyon Jetboat Service to determine the safety of up river travel above mile RM 260, since they are there on a daily basis and are well apprised of existing conditions.
2. Either drop the restrictions on the number of pick-ups per day or build in some flexibility to allow for take out/pick-up situations that cannot be anticipated.

Increased flexibility particularly at ends of trips could help reduce congestion and promote cooperation between groups.

ALLOCATION

Adjustable Split Allocation Approach (Chapter 2 pp. 24-26 and Chapter 4 pg. 652-653)

Grand Canyon River Guides believes that the "adjustable split allocation" concept is one of the most controversial, and questionable, ideas in the DEIS. Our concerns go to the heart of the underlying concepts and the methodology proposed in the DEIS.

The park seems to use the words "interest" and "demand" interchangeably when they are not the same thing. We are skeptical that the proposed method (the registration system) could measure all variables in any meaningful sense.

During the "expert panel" discussions in Phoenix, the expert panel (assembled by the NPS) agreed on several things, as follows:

A) The waiting list, and reservations for commercial trips, are indicators of demand, but are not useful in quantifying it.

B) "Demand" for commercial and non-commercial trips is demand for fundamentally different things. Comparisons inevitably involve "apples" vs. "oranges" and are neither useful nor valid.

C) A study of relative demand between the two sectors would be very expensive and - because of the "apples vs. oranges" problem mentioned above - not likely to produce definitive results.

In the DEIS it states,

"Since there is no comparable system for people wanting to go on commercial trips, the waitlist does not give a clear indication of relative demand. Social scientists have speculated that it would cost Grand Canyon National Park around \$2.5 million to conduct a demand study to adequately determine demand and the results would still not be absolutely definitive (Shelby and Whitaker 2004)." (page 652)

D) Consequently, many experts also expressed the opinion that any system of allocation (including the current allocation, and any allocation made under the DEIS) would be arbitrary.

Grand Canyon River Guides is extremely skeptical as to how this registration plan would work and whether the results would be credible, especially in light of the difficulties

mentioned above. It is worth noting that the NPS itself does not know how this would work.

The questionnaire passed out at the public meetings asked:

- **Requiring every trip member to register will ensure that information is accurate and will help the NPS assess the relative demand for river trips. An alternative to this could be to allow trip leaders and concessionaires to sign up trip members. If there is a better way to balance application ease and assess relative demand for river trips, what is it, and how would it work?**
- **As part of the registration process, what questions would you like to see asked, and what data would you like to see recorded?**
- **What safeguards could be put in place to help ensure people do not artificially stack the system or generate additional demand?"**
(<http://www.nps.gov/grca/crmp/documents/handouts2/Station6AdjustableSplitAllocationHandout.pdf>)

GCRG's observations are as follows:

With regard to the first question, the assumption that registration would gather accurate information is incorrect, as there is an incentive to cheat. This concern is explicitly recognized in the third question. Your experts expressed skepticism about whether relative demand could be measured (due the "apples vs. oranges" problem) - it's unrealistic to expect the partisan interests responding to this questionnaire to do any better.

In response to the second question, as part of the registration process, (assuming some resolution to the "apples" vs. "oranges" problem) positive identification of registrants will be essential. This will require the collection and collation of registrants' names, addresses, social security numbers and possibly credit card numbers etc. Given the antiquated state of GCNP's computer systems a whole new encrypted and secure database will be necessary in order to ensure that there is no risk of identity or credit theft of the registrants. This endeavor which will also require staff to collect and collate the information will be a logistical nightmare and extremely expensive for GCNP and the American taxpayer.

The third question raises the most critical concern: commercial and non-commercial interests alike don't see a way to prevent cheating to bias the system. For their own protection, both are likely to try to bias the results in their favor. Consequently, neither is likely to accept the results as accurate.

Even if the results were credible to sociologists (not likely), if they are not accepted as reasonable and accurate by stakeholders, they will be the source of further controversy, not the solution.

Another problem we perceive is that the way this plan is proposed, the adjustment of summer time use can only go in one direction, towards the non-commercial sector. One of your objectives is "fairness" and we believe this restriction fails that test.

Grand Canyon River Guides believes that the proposed "adjustable split allocation" is at best a questionable exercise in futility. It may also be an expensive waste of time. In our opinion, the park will be fanning the flames of the fire it is trying to put out by continuing the debate about allocation, which will never be resolved to the complete satisfaction of all interested parties.

Our proposed solution:

1. In the final EIS, recognize and state explicitly that demand for commercial and non-commercial use are fundamentally different and that, consequently, any "split allocation" is inherently arbitrary (as recognized by your own experts).
2. Identify your (admittedly arbitrary) allocation split and be prepared to stick with it. Fixed split allocations are standard fare on other popular rivers.

We note the press-release for the recent agreement between the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, American Whitewater, and the Grand Canyon River Runners Association (hereinafter the "collaborating groups") which proposes to end the confrontation over relative allocations by agreeing that the allocation split should be 50/50, with more commercial use in the summer season and more non-commercial use during the rest of the year. Grand Canyon River Guides believes that the final plan should resolve this contentious issue by endorsing the 50/50 allocation split, WITHOUT endorsing the 35% use level increase advocated by the "collaborating groups." We believe the increase would be detrimental to the resource and the river experience.

This recent agreement presents both an opportunity and a challenge for the NPS. The opportunity: accept their agreed upon 50/50 allocation split, with seasonal differences and different launch opportunities, and forget the proposed registration plan and the undoubtedly futile attempt to quantify demand. They agreed to this split, and say it's "fair"; they can live with it. The challenge: now that this contentious issue is resolved, meet the NPS legal obligation to put resource protection ahead of recreation when they conflict, and reject the demands for even more use.

3. Abandon the registration plan and the attempt to quantify relative demand among the sectors. Under the recent agreement the "collaborating groups" have expressed interest in a fixed, 50/50 allocation and opposition to the

registration system. Consequently, this part of the proposed plan is unnecessary, and would be a waste of resources.

4. Focus attention instead on making the distribution system for non-commercial permits meet the various diverse needs of non-commercial boaters. The waiting list system was at least partly responsible for the popular perception that non-commercial access to river trips was unfairly restricted; an improved access system with a focus on permits one year at a time, in conjunction with the 50/50 allocation, will do much to alleviate the perception that the system is unfair to non-commercial boaters.

NON-COMMERCIAL PERMIT SYSTEM

Weighted Lottery for Groups Option (Chapter 2 pg. 100 and Chapter 4 pp. 661-662)

A "one size fits all" system (the current Waiting List) ignores the fact that different people want different things. Some groups need more time to plan a trip than others, some people can go almost at the drop of a hat, and others perceive that they must get in line to go eventually, but don't know when that might be.

Multiple pathways leading to a trip should be available to suit different needs: the existing waiting list (while it is being phased out), a lottery system, and a system to distribute cancellations each could serve different needs and expectations. The primary focus of the new system should be getting permits into the hands of people who want to go in the coming year.

According to the DEIS,

"If the primary distribution system is well-designed, cancellations should be minimal because groups apply for time periods when they can reasonably expect to take the trip and they have enough time to prepare for it. (Page 98)

Furthermore, the objectives for selecting a permit distribution system are,

- 1. Offer opportunities for new users to succeed in gaining a permit.**
- 2. Favor requests from those who have been unsuccessful in previous years.**
- 3. Minimize the bureaucratic burden for applicants.**
- 4. Preserve the group character of noncommercial trips (those who want to travel**

together in a group) (pages 98-99)

GCRG believes that the weighted lottery, as proposed, represents an improvement over the waitlist system in some respects, but needs further refinement to meet the above objectives.

We believe a well-designed system would focus on delivering permits into the hands of groups who want to go on a Grand Canyon river trip one year at a time, and would not encourage or allow people who want to go at some future time to participate until and unless they are ready to go.

Commercial outfitters have had some experience booking trips as much as a year and a half ahead of time, and have learned that while this works for some people it also results in a large number of cancellations when other people find that their plans change. Reservations made in a shorter time frame, closer to the actual trip date, are much more likely to be utilized, and avoid the hassles of rescheduling and/or re-booking. According to the DEIS,

"The National Park Service currently schedules noncommercial trips about 1.5 to 2.5 years ahead of launches, which may be too long to fit with most people's vacation planning horizons. About 80% of self-guided boaters report planning less than one year in advance of taking a Grand Canyon river trip (Hall and Shelby, 2000), so they are being forced to engage in initial scheduling before they are ready to commit to a trip. This helps explain why many delay initial scheduling, why they want to defer after they have received a launch date, or may have to cancel altogether."
(Page 659)

We believe that reducing the planning time frame to one year (as proposed for the lottery) will better serve interests of non-commercial boaters and should help reduce cancellations. But as observed in the DEIS (above), 80% of self-guided boaters begin planning less than one year in advance; a one year lead time may still be excessive for most boaters.

Lotteries on other popular Western rivers (Dinosaur National Park, Idaho's Four Rivers, Desolation Canyon, and the San Juan, for example) are held in February for launches in May through September of the same year. Since most boaters would choose a Grand Canyon trip over a trip on these rivers, and would also need more time to plan and organize a longer trip, it might be desirable to hold the lottery for the popular summer season permits in the previous fall (November or December), which would result in a more realistic time frame for trip organization and planning. Another lottery for the fall, winter, and spring season permits could be held in the spring (May or June). Two lotteries a year, rather than one every month, might be easier on the NPS staff as well as better suited to the needs of people seeking permits.

Favoring people who enter and lose in future lotteries will encourage some people to

enter even if they don't want a permit in the coming year, in the hopes that their chances will improve in following seasons, unless there are penalties for winning, but not using, a permit. Consequently we believe that the weighted lottery, as proposed, would eventually become another version of the wait list system: after a few years, most permits would go to people with advantage accumulated from earlier participation, and new users would have very little chance of success.

An alternative form of preference should be considered which would not encourage people not planning an immediate trip to participate in the lottery in the hopes of gaining an advantage in subsequent years. To maintain a primary focus on people who want to go in the immediate future, we propose this preference should be in the form of improved call-in status for cancellations for people who have entered the lottery and lost. After the winners are selected, losers should be eligible to call in for cancellations when they are available.

Initially, during the transition period in which the waiting list is also maintained, lottery losers should get to call in only at the end of the week, after people on the waiting list (who have already waited, but failed to get a permit) have had their chance. In subsequent years repeat losers could have their call-in status automatically moved forward in the week; after five years they would have Monday call in status if they continually failed to draw a permit.

Another way to increase opportunities for both new users and applicants who have been unsuccessful in prior years would be to restrict successful applicants from future lotteries for some time period. A successful applicant might be required to wait a year or two after his/her trip before being eligible to be the permit holder and trip leader again; they could still be able to go on a trip with another trip leader. This would make the most sense for permits during the popular summer season, for which there will be intense competition regardless of how the permits are issued.

Other suggestions for managing cancellations: just as commercial passengers need to confirm their reservations with a non-refundable deposit, non-commercial boaters should also be required to make partial payment for permit fees as soon as they get a launch. The current policy of collecting permit fees 90 days before launch is incredibly permissive and encourages people to reserve launches that they are not sure they can use.

In the commercial sector, where sometimes there is intense competition for popular launch dates, passengers making reservations must confirm their reservations with a non-refundable deposit within a week or two, or the reservation is cancelled and made available to someone else. Most companies require additional deposits as the trip nears, and payment in full (non-refundable) well before the launch date. At AzRA, for example, the full trip fare is due 120 days before the trip begins. In comparison, the treatment of non-commercial permit fees under the current system is incredibly lax.

A similar deposit schedule for non-commercial permit fees would help weed out less

serious applicants. This would be especially effective if a non-refundable deposit on permit fees were immediately charged to the applicant's credit card upon winning a launch date. This immediate fee could be 10% of the total fee, with the requirement that an additional 15% be paid within a couple of weeks. Payment in full should be required 120 days before launch. If the launch reservation is not confirmed by additional payments in a timely fashion, the launch should be considered cancelled and made available to others who did not qualify for a permit.

Another suggestion for the lottery would be drawing a "runner up" for each launch, if more than one group applies. If the winning group fails to submit the permit deposit in a timely fashion (two or three weeks), the runner up would be offered the permit under the same terms. If neither group makes a deposit of the permit fees on time, the launch should be available through the system for handling cancellations. With a two or three week time limit for permit deposits, cancellations could be available in a time frame that could work for almost any group that was unsuccessful in the lottery.

We also like the idea that everyone listed on the original application would be considered eligible to be an alternate trip leader if the original applicant is unable to go on the trip. When the original applicant can't participate, permit transfers to an alternate trip leader should be automatic; the policy of allowing permit holders to defer trips should be disallowed altogether. Groups that cancel should be penalized by having to start from scratch to obtain another permit, and not rewarded by being allowed to reserve a date in another year.

Additional means of encouraging early, rather than last-minute, cancellations would also increase the likelihood that desirable launch dates get used.

Members of groups that cancel late - say within the last 60 days – should be subject to a penalty in addition to loss of paid fees because late cancellations or no-shows make it more difficult or impossible for other groups to organize a trip and take advantage of the launch opportunity. One possible penalty would be banning members of late canceling groups from participation in non-commercial trips for some period, perhaps within two years following the cancelled launch. Similar penalties are applied in Dinosaur National Monument for late or last minute cancellations to encourage timely cancellations. Whatever time frame is selected, it should reflect the longer length of time usually required to organize and plan a trip that is more than two week long.

Grand Canyon River Guides feels that this carrot and stick approach, in combination with permits for groups (rather than individuals), would have a large impact on the cancellation problem.

Because of the high popularity of Grand Canyon trips, a system that deals with cancellations in several stages would be highly desirable: early cancellations should go to people on the waiting list, or lottery losers, with advantages granted to those who have waited longest or lost most often. But late and last minute cancellations should be

available to anyone who can use them, providing they meet the qualifications for being a trip leader.

While many groups will need a long time frame to organize a trip, others will not. For some boaters, having to organize a trip a year in advance may be a considerable disadvantage. The cancellation system should recognize that different people and groups have different needs, and attempt to serve them all.

Since the weighted lottery system for river permits is untested, some consideration should be given to the possibility that it may fail to meet the intended objectives. In that case, "plan B" should be the institution of a straight lottery system similar to those used on other popular rivers; starting another "waiting list" system should not be contemplated under any circumstances.

Transition Options (Chapter 2 pg. 100-102 and Chapter 4 pp. 663-665)

It will be necessary to reserve some launches for the lottery each month, if wait list participants get the first chance to pick launches. Some proportion of both small and large launches should be available to people on the wait list, while the rest should be reserved for the lottery. The proportion of trips of each type should be based on current use.

It might be desirable to allow groups on the wait list to also try in the lottery without losing their place in line. Some people at the end of the list may be ready to go before others who could be in front of them in the queue. The burden of listing all possible participants far in advance will effectively eliminate people at the end of the line unless some form of early participation is allowed. We don't think it is realistic to form a group for a trip, with no additions allowed later, more than two years ahead of time. Consequently, the dual access system (wait list and lottery) should quickly evolve into a single access system through the lottery and cancellation system.

We suspect that the requirement to form a group before participating in the lottery, or name the people in your group in order to remain on the waiting list, will be very unpopular, and may be a significant hurdle for inexperienced boaters. However, it will require people to think more seriously about planning a non-commercial trip before attempting to obtain a launch date, and should greatly improve the prospects of groups that do obtain permits.

The group aspect of this plan may be a bit unrealistic, as are the expectations of most inexperienced non-commercial boaters attempting to plan a Grand Canyon river trip. The reality is that there is usually a large turnover in the composition of the intended group between the time a launch is obtained and the launch itself. Most inexperienced boaters underestimate the difficulty of having all of their friends obtain time off work or freeing

themselves of other obligations in order to participate on a trip once the launch is scheduled.

Consequently, we hope that the new system will evolve as necessary, and not be allowed to fester in a dysfunctional state until planning begins for the next management plan, as was the case for the wait list. If the weighted lottery for groups does not work as intended, the fall back arrangement should be a non-weighted lottery for individuals, the typical arrangement on other rivers for which there is a high demand and limited launch opportunities. A return to the wait list system should not be contemplated.

OPERATING REQUIREMENTS CHANGES (repeat use, generators, site restrictions, etc) (Chapter 2 pp 30-32)

As always, Grand Canyon River Guides believes that any new rules should be reasonable and based on common sense. Furthermore, extra rules and regulations should be avoided where the problem can be mitigated through other means (such as education), since rule enforcement increases the administrative burden on the park. Grand Canyon River Guides' comments regarding the proposed additions to the Operating Requirements are as follows:

Repeat Use: The park's justification for this new rule is to, “**maximize opportunities of the public to access and experience Grand Canyon River trips...**” (page 31).

It seems far more likely that this rule was added to eliminate the perception of rampant repeat use by self-guided boaters, thereby creating more perceived equity. Either way, there is no real problem to fix and eliminating repeat use by either private or commercial users will not result in a significant impact on either of these rationales. According to park statistics, less than 3% took more than two trips in a five year period, however only 60 out of 15,500 people (less than half of one percent) who took non-commercial trips over the five-year period averaged one or more trips per year (page 658). The park's own statistics prove that repeat use is not a problem that needs to be addressed.

Frankly, we believe that repeat users come to know the river well, and similar to commercial guides, they develop a vested interest in the protection of the river and canyon resources. They are also more likely to be aware of and enforce sanitation and environmental protection rules, which results in trips that have less impact on the canyon.

Grand Canyon River Guides does recognize that there is a continuing problem with “pirate trips” - probably a few each year - where unscrupulous individuals run “non-commercial” trips for profit. These trips violate both the letter and spirit of the non-commercial regulations, and also reduce the access of legitimate non-commercial boaters to trips, yet the Park Service has failed to address this problem in an effective way. During our recent board meetings, we have heard personal accounts of individuals being

offered significant money for private permits, non-commercial trips flaunting pirate flags, and a permit holder showing up at Lees Ferry for a trip only to hand his permit to a “pirate” who conducted the trip while the permit holder headed home.

The details of the various schemes and personalities involved in this “dark-side” boating are well known to legitimate boaters, commercial and non-commercial alike.

Our suggestion: don’t fix something that doesn’t need to be fixed (repeat use by legitimate boaters); instead, address the piracy issue and take action to stop this unethical practice. Fines for “pirates” could be effective especially coupled with banning offenders from the permit list.

Generator Use: The DEIS doesn’t state a reason for this rule addition, but we deduce that it is a noise issue. There are other ways to approach this: better education regarding river etiquette, for example. A rule about generators (but not noise) will have silly and counter-productive consequences: motor guides in the habit of using blenders to make cocktails will plug them into the electrical outlets on their 4-cycle Honda engines, and run the engine instead of the generator. Non-commercial boaters have already developed gas-powered blender technology, which can be viewed (and HEARD) on the World Wide Web. Instead, promote the distribution of the Grand Canyon Courtesy Flyer developed by GCRG in cooperation with the Grand Canyon Private Boaters Association which addresses the noise issue. Common sense should prevail, rather than developing new rules which are unnecessary.

Commercial Operator Responsibility for Passengers: The 2005 Commercial Operating Requirements already require that a “guide or trip leader familiar with the trail to be taken will lead all group hikes.” This was also a requirement in the 2004 COR’s. However, we do have some observations about the feasibility of guide accompaniment on hiking exchanges (in and out of the canyon). As we discussed in our comments on the Visitor Use and Exchange section of the Draft CRMP, due to the varying fitness levels of exchange passengers, they may become spread out significantly with as much as several hours hiking time between some passengers. The hiking “group” will very quickly become a long string of individuals spread out along the trail. A hiking guide accompanying such a group will quickly become a “running sweep” accompanying only those passengers who are the slowest. This also means that the guide would be unable to help other passengers if there is trouble up the line.

GCRG believes that there is a point after which you sanitize the wilderness experience too much by taking away the challenging aspects of the experience. While we are all for improving safety, this particular measure seems to be destined to be more symbolic than effective; we also wonder whether it will encourage more of the wrong people to attempt an exchange at Phantom than would if they knew all the responsibility was on their own shoulders.

Another concern is that the proposed rule makes no allowance for situations in

which guides might reasonably encourage passengers to explore things on their own. An example would be encouraging passengers to explore Blacktail Canyon, where the guides might follow, rather than lead them, with little risk. While we recognize a responsibility for passenger safety, the requirement for constant and sometimes overbearing hand holding under all circumstances is offensive and degrading to the experience. Are you suggesting that we have to tell passengers that they can't walk to the lower waterfall at Stone Creek from the campsite without a guide? Perhaps this is not the intent of the proposed rule...if so, some clarification is in order. The distinction needs to be made between a group hike and merely taking a walk. "Allowing visitors to experience the river on its own terms" is an objective that must be preserved. Simply put, commercial passengers need to be given a little solitude and guides a little latitude...

Guides: We agree that commercial guides and crew should not count against user-day allocations, as it may provide an incentive to minimize the number of guides/crew while maximizing the passengers. Ensuring a proper ratio of guides/crew/passengers is essential to the functionality and safety of trips. Grand Canyon River Guides takes exception, however, with the park's assertion that commercial river guides are indistinguishable from other users with regard to social and ecological impacts. The professionalism and stewardship ethic of commercial river guides in Grand Canyon is widely recognized. The river corridor is in as good a condition as it is today because of them. Trip safety is also at a high level because of their extensive training. Their knowledge and expertise create a significantly lighter impact on the canyon, both socially and ecologically, than that created by any other user group.

Site Restrictions:

Tapeats and Kanab Creeks: We appreciate the incremental approach of restricting these sites to day-use only rather than resorting to complete closure. However, GCRG suggests that these restrictions should apply to all users, including backpackers, as they may be responsible for at least some of the damage. If these areas are left open to backpackers, this will be discriminating against river runners and could create more cynicism about rules in general. Furthermore, interested parties could get around the rule by obtaining backcountry permits, in which case the restriction would be about bureaucracy and paperwork rather than environmental protection.

We also suggest that Leave No Trace education efforts geared towards all users of the river corridor could be an effective way to deal with this situation, resulting in better protection of canyon resources.

Little Colorado River: Playing at the LCR is one of the highlights of a Grand Canyon river experience. There is no data to prove that recreational use harms the native humpback chub in this area. In fact, repeated handling and electroshocking of the fish by researchers probably causes far more harm. We believe that the rule as currently written is counterproductive: it's based upon conjecture, and does not make sense. However,

GCRG suggests an alternative: allowing swimming in the mini-rapid at the LCR - the long-standing traditional play area - would not adversely affect the chub fry or eggs which are more likely to be found in your proposed swimming area near the mouth. This scenario - allow swimming at the rapid and the immediate vicinity only - would work better for the fish and for boaters too.

Diamond Creek Takeout Procedures/Scheduling: The Hualapais have the right to implement whatever rules, procedures and scheduling they desire for Diamond Creek. It behooves all river users to comply with these rules since non-compliance could ultimately mean the complete closure of Diamond Creek to all non-HRR river trips. The Hualapai have this prerogative and we must respect their wishes in this regard.

Minimum Trip Length to Phantom Ranch: This rule is in line with Grand Canyon River Guides' previous scoping comments, and should increase flexibility while allowing for better scheduling to avoid crowding at key attraction sites.

Commercial Guides on Noncommercial Trips: This rule is completely unnecessary as it is a duplication of an existing rule from the "Noncommercial Use Affidavit" governing private trips that specifies that the purpose of a non-commercial trip is for its recreational values and will not be conducted for monetary gain for any trip participants. Additionally, the Non-commercial River Trip Permit Application states on page 5 that "collecting a set fee (monetary compensation), payable to a trip participant, individual, group, or organization, for conducting, leading or guiding a noncommercial river trip is not allowed." The existing rule does not need clarification – commercial guides are well aware that they may not be hired to assist on noncommercial trips. Furthermore, your suggested wording, "Commercial guides may not be hired to assist on noncommercial trips" (page 32), could actually obfuscate the above rule, as it could be read to imply that people who are not commercial guides could be hired, when that apparently is not the intent. However, the park does need to address the piracy issue in a productive and meaningful way as we discussed under "Repeat Use" above.

A proposal for a new non-commercial trip rule: All non-commercial trip rafts should be required to display a permit ID tag (as is common practice on other regulated rivers) so they could be easily identified. GCRG believes that accountability encourages responsibility.

OTHER COMMENTS

We at Grand Canyon River Guides would like to extend our gratitude for your diligence and hard work in tackling this immense project. Founded in 1988, GCRG is a non-profit educational and environmental organization with a highly diverse membership of over 1,800 river guides and river runners, all of who care deeply about Grand Canyon and the Colorado River. Since our inception, Grand Canyon River Guides has sought to

preserve, protect and defend the canyon, the river, and the magic they bestow upon us all.

GCRG has spent a great deal of time reading over the Draft EIS of the Colorado River Management Plan, discussed it in board meetings and have solicited comments from our members. The comments GCRG has provided here are the culmination of our efforts and they reflect our mission to protect Grand Canyon as a natural resource and preserve the Colorado River experience, while setting the highest standards for the river profession. Our commitment to this mission and our first-hand knowledge of the canyon and the river lead us to believe that the DEIS falls short of these goals in a number of ways:

Our primary concern is the significant increase in overall use as proposed in Alternative H. In its current state, we believe the Colorado River is at its ecological carrying capacity in terms of the total number of people using the river corridor. Increased use will only mean increased impacts on the ecological and cultural resources, the diminishing beaches and the visitor experience. These (along with other) cumulative influences will further accelerate the degradation of this precious place that the NPS is legally bound to preserve.

It should be noted that GCRG has reviewed the joint proposal submitted by the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, American Whitewater and the Grand Canyon River Runners Association. While we agree with some elements of the proposal, such as the equitable 50/50 allocation split, GCRG does not feel that increased use should be allowed simply to settle this controversy. The resource must come first, along with the careful preservation of all that makes Grand Canyon and the Colorado River unique.

We are also very concerned about decreasing the maximum trip length. Shorter trip lengths will mean less user discretionary time which in turn will exacerbate crowding and congestion throughout the river corridor at attraction sites, interchange sites and major rapids. It could lead to non-commercial trips feeling rushed, thus jeopardizing non-commercial and commercial trip safety. This change could also increase interaction time between trips in that a 16-day commercial trip and non-commercial trip launching on the same day will in effect be on the same schedule.

Furthermore, the success of this plan is predicated on the ability to adequately monitor resources and implement mitigation measures where necessary, yet the DEIS does not include a detailed monitoring/implementation plan, and sufficient funding may be problematic. It is imperative that the final plan provide a mechanism for accountability and compliance beyond the document itself.

As active guides and stewards of Grand Canyon we experience the effects of management along the river corridor on a daily basis. The quality of our “workplace” and the ability to retain qualified and competent guides is directly linked to the overall health of Grand Canyon. This National Park and river corridor is a place many of us have dedicated our lives to learning about and protecting through our jobs and

educational interactions with passengers on trips. Increasing use and decreasing trip length will jeopardize the health of the Colorado River corridor and the experience of those who enjoy it in a safe and conscientious manner.

Grand Canyon River Guides offers these comments, not only as our duty in this public process, but also as an opportunity to demonstrate to the park our shared commitment to the continued protection and preservation of this resource and our desire to work together towards that worthy end. Please review our comments and feel free to contact us with any questions you may have.

