

December 2, 2005

Mr. Joseph Alston, Superintendent
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023-0129

Dear Superintendent Alston,

Grand Canyon River Guides (GCRG) is honored to be invited as an interested party to review and comment on the Draft Programmatic Agreement concerning impacts from the implementation of the Colorado River Management Plan for Grand Canyon National Park. Grand Canyon River Guides, Inc., founded in 1988, is unique in that it provides a unified voice for river guides and river runners in defense of the Colorado River corridor through Grand Canyon. Composed of over 1,900 individuals who are loyal and dedicated to the continuing preservation of this national icon, our non-profit 501(c)(3) educational and environmental organization's goals are to protect the Grand Canyon, to set the highest standards for the river profession, to celebrate the unique spirit of the river community and to provide the best possible river experience.

Our members understand that the Grand Canyon is a highly sought after and deeply treasured outdoor experience, and without proper protection we would lose one of the most valued, irreplaceable areas, not only of the United States, but of the world. This same sentiment applies to the rich cultural resources and traditional cultural properties of Grand Canyon National Park. It is imperative that Grand Canyon National Park achieve its objectives for these fragile and non-renewable resources, and we are therefore greatly encouraged by the development of a Programmatic Agreement that will strive to protect these National Register listed or eligible historic properties from potential adverse effects.

Our review of the Draft Programmatic Agreement prompts Grand Canyon River Guides to offer the following comments for your consideration:

Section 1(a): We assume that many of the referenced 674 historic properties are not actually listed on the National Register of Historic Places, but are nonetheless deemed register-eligible. Because eligibility affords the same degree of protection as those formally listed, GCRG agrees that their general characterization as "historic properties" is sufficient to indicate the intent and scope of this agreement. However, we would suggest that the last sentence of 1(a) be changed to read as follows (our additions in italics):

"As future archaeological and ethnographical research identifies prehistoric and historic sites, *traditional cultural properties* and Native American resource

locations, these sites, features or *TCPs* will be considered as elements within the eligible districts until the Park completes further evaluation pursuant to 36 CFR 800.4.”

The 1980 amendments to the National Historic Preservation Act encourage the identification and documentation of these intangible cultural resources. Our suggested inclusion of *TCPs* in Section 1(a) additionally reinforces the range of applicable resources as described in this section’s introductory paragraph.

Section 1(c): We concur that the on-going program of inventory and assessment of potential historic properties within the APE should be a priority. This section mentions that approximately 10,000 acres of the river corridor have been inventoried, but does not provide a clear indication how this relates as a percentage of the Area of Potential Affects (APE). We suggest that doing so would more directly frame the scope of work.

GCRG is also very concerned about the vague and open-ended phrase “as time and funding allow” which effectively deprives the Programmatic Agreement of any accountability for the successful assessment of potential impacts from the Colorado River Management Plan. We therefore strongly suggest that this Programmatic Agreement clearly delineate both an action plan and a timeline in order to build in compliance and accountability. Furthermore, although the linkages between the CRMP historic property management program and the AMP cultural program are discussed in Section 3, we suggest that information sharing and delineating respective agency responsibilities should be encouraged in order to more efficiently take advantage of the limited funding and time available to conduct necessary actions such as inventorying, monitoring, etc.

Section 2: We commend Grand Canyon National Park for acknowledging potential impacts from a range of administrative activities while allowing for opportunities to review and comment upon the impacts of NPS permitted administrative use. However, the language of this section indicates that only signatories will be consulted and that their comments and concerns will be solely addressed as appropriate and feasible. Therefore, we suggest that the last two sentences of Section 2 be revised to include both signatories *and concurring parties*, which is the language used throughout the remainder of this document.

Section 3(a): In accordance with Grand Canyon River Guides’ comments on the Draft EIS of the Colorado River Management Plan, we strongly concur that developing a definitive linkage to the GCD/AMP is an absolute necessity. However, we would like to point out that this Draft Programmatic Agreement does not indicate that the GCD/AMP has its own Programmatic Agreement for developing management goals for cultural resources in Grand Canyon National Park, discerning information needs and guiding management actions. Because of the existence of two parallel processes with the same end goal, we suggest that this Programmatic Agreement 1) acknowledge the GCD/AMP Programmatic

Agreement for cultural resources, 2) more clearly delineate responsibilities between the respective agencies, 3) define mechanisms for information sharing, and 4) develop means to maximize productivity and effectiveness by eliminating redundancies from these overlapping efforts. Section 3(a) only provides a very cursory outline of integration plans. More specifics are needed.

Section 3(b): This section provides a description of seven elements that will be encompassed within the CRMP historic property management program. Grand Canyon River Guides' observations/suggestions are as follows:

- 1) The review of administrative activities affecting historic properties should be added as an element as defined within Section 2.
- 2) The listing of treatment actions and protocols that could be performed under this agreement or through the GCD/AMP program (see element #5 of this Section 3(b) listing) does not include sediment re-distribution as currently presented in this Draft. The cultural resources section of the SCORE report states, "*A system-wide method for regenerating the river terraces and redistributing sediment is generally considered an essential component to maintaining the integrity for cultural resources.*" Grand Canyon River Guides therefore strongly suggests adding sediment re-distribution to the list of treatment actions as a crucial tool for the preservation of archaeological sites along the river corridor.
- 3) The CRMP historic property management plan should make clear what it is "managing for" in order to determine when conditions are approaching, at, or outside of standards. This articulation will provide a mechanism for accountability and compliance, and should therefore be included as an essential element in this Section 3(b) listing.
- 4) The development of a comprehensive education strategy should be added in order to draw the public into the active preservation of these non-renewable resources.
- 5) The CRMP historic property management program, although developed in consultation with signatories and concurring parties, should also be available for public review. In particular, standards must be articulated to the public at large in order to ensure accountability while aiding compliance.

Section 3(c): Grand Canyon River Guides is concerned that signatories and concurring parties may not be consulted on specific treatment actions. These vary widely in their severity and ramifications, from minor treatment actions such as trail work or public interpretation, to major actions such as site closures. Site closures should be a last resort, with all other applicable treatment actions implemented before making this decision. We strongly suggest that all signatories and concurring parties be consulted prior to any treatment actions that could be defined as "major" in nature.

Section 3(e): We suggest that the list of guidance documents for all work affecting historic properties should also include the National Historic Preservation Act and its amendments.

Section 4: Grand Canyon River Guides applauds the emphasis on research, planning and stewardship as well as the explicitly stated goal of preservation as outlined in Section 4. However, we feel that the role of education is undervalued by not being specified as an additional long-term management strategy in its own right. Education is the *precursor* to stewardship as it is necessary for people to understand these resources in order to value them, and they must value them before they will protect them. Education is also the least invasive and most effective tool for preserving these irreplaceable historic properties. We therefore reiterate the need for a comprehensive education strategy as a means of fostering active stewardship. The inclusion of education as a long-term management strategy will allow it to take a more prominent role in mitigating potential negative impacts to historic properties from the increased use described within the “Preferred Alternative” of the *Final Environmental Impact Statement of the Colorado River Management Plan*.

Furthermore, we suggest that the inclusion of the theory of adaptive management as a long-term management strategy would both reflect the intent of this Programmatic Agreement’s Section 5, and Sections 7-10, as well as the specifications of the Final EIS for the Colorado River Management Plan that states, “*If resource conditions change sufficiently to adversely affect resources or visitor experiences or if mitigation measures cannot be adequately funded or implemented or are unsuccessful, park managers will use an adaptive management approach to review and revise visitor use prescriptions within this river management plan.*”

Lastly, the officers and board of directors of Grand Canyon River Guides greatly appreciate the opportunity to be involved in the development of this Programmatic Agreement. If you should have any questions or comments upon the views and suggestions we have offered here, please feel free to contact us. We look forward to our continued participation as this important process moves forward.

Sincerely,

Lynn Hamilton
Executive Director

cc: Ms. Jan Balsom – Chief, Cultural Resources, Grand Canyon National Park
Ms. Grace Ellis – Cultural Resources Specialist, GCNP
Mr. Wayne Taylor – Chairman, Hope Tribe
Mr. Rex Tilousi – Chairman, The Havasupai Tribe
Ms. Carmen Bradley – Tribal Chairperson, Kaibab Band of Paiutes
Ms. Evelyn James, Tribal President, San Juan Southern Paiute Tribe
Governor Arlen Quetawki – The Pueblo of Zuni
Ms. Lora Tom – Chairwoman, Paiute Indian Tribe of Utah
Mr. Philbert Swain – Chairperson, Moapa Band of Paiute
Mr. Vincent Randall – Councilman, Yavapai-Apache Nation
Ms. Gloria Hernandez – Chairperson, Las Vegas Tribe
Mr. Dennis Fenn – Center Director, Southwest Biological Science Center
Ms. Amy Heuslin – Bureau of Indian Affairs
Mr. Rick Gold – Regional Director, Bureau of Reclamation, Upper CO
Mr. Brad Warren – Western Area Power Administration
Ms. Kelly Burke – Grand Canyon Wildlands Council
Mr. Nikolai Ramsey – Grand Canyon Trust
Ms. Leslie James – Executive Director, Colorado River Energy Dist.