

# RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING Rivers

Dave Uberuaga  
Superintendent  
Grand Canyon National Park  
PO Box 129  
Grand Canyon, Arizona 86023

December 12, 2013

Dear Superintendent Uberuaga,

As co-director of the non-profit River Runners for Wilderness (RRFW), it was a pleasure to meet you in September of 2011. As I mentioned then, I greatly enjoyed our frank exchanges covering many aspects of river and backcountry management at Grand Canyon National Park (GRCA). River Runners for Wilderness has over 2,000 members and we release periodic news releases through the RRFW Riverwire to well over 10,000 river enthusiasts about river running issues pertaining to wilderness rivers.

During our 2011 meeting, we had discussed the high number of unclaimed winter self-guided river trips, now amounting to almost 150 river trips. At that time we had identified three simple changes to help decrease this number. The changes we encouraged your office to consider included elimination of the one-river-trip-per-year rule for self-guided river runners in the commercial-free winter months, removing the lottery point “reset” for participating in a winter river trip, and returning winter trip lengths to the pre-2006 winter trip length of 30 days to Diamond Creek from the present 25 days.

Your follow-up letter of December 12, 2011, (A9031 (GRCA 8226), was encouraging, as you noted that two of our three suggestions, removing the one-trip rule and increasing trip lengths, either merited further enquiry or consideration. In your letter of December of 2011, you asked us to “be patient” while you reviewed others opinions and concerns. This was encouraging, especially as RRFW had been requesting these simple changes since 2007.

We reviewed those changes again with your office in a letter dated December 3, 2012, but received no response to that letter. Since December 12, 2011, no changes have been made by your office to rectify this loss of river trips.

Meanwhile, the Grand Canyon Private Boaters Association (GCPBA) wrote you a similar request on July 8, 2013. In that letter, the GCPBA asked your office to eliminate the one trip per year rule in the winter after a river trip date had failed to be awarded after two lotteries. While we do not agree that the one-trip-per-year rule should be tied to lottery operations, according to the GCPBA, your reply to their request was as follows:

*“We also do not like to see the handful of winter river permits going unused each year, and have looked carefully at why they are going unused. It is not that the trips are undesired; we see applicants claiming our winter permits as long as there is sufficient time before launch remaining for the necessary preparations and planning. In fact, all launch dates do get claimed*

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*at least once. The problem is late cancellations. Understandably, few are interested in applying for a winter launch if they have less than a month or so to plan. As a consequence, we have been considering ways to effectively reduce the number of late cancellations for winter trips.”*

To be clear, we have been encouraging your office to make these winter dates more attractive before they are released in the annual lottery, in an effort to avoid having them cancelled at all, either with a long cancellation time or a short one. It is clear that if the permit is attractive enough in the first place, it will not be canceled. It would appear your office has yet to implement any substantive changes to address the issue of unclaimed off-season dates since this issue was raised in 2007, and based on the information above, it now appears your office is shifting toward an attempt to assist river runners in claiming last minute cancellations instead of making the river trip more desirable in the first place.

According to information available elsewhere in the GRCA web site, the Park has handled almost 19,500 lottery applications for just under 2,000 river permits released in the six main lotteries from 2007 through 2012. Projections still indicate lottery applicant chances of actually winning a permit are about once every 25 years. Given the number of lottery applications to the number of available river trips, we would expect your office to do everything it can to make sure all river trips launch. We respectfully request a written response from your office as to how the National Park Service (NPS) is going to adapt the management plan so that self-guided river runners do not miss out on the opportunity to launch these 150 winter trips in the next five years.

Meanwhile, in November of this year, your office released an on-line eight year lottery review ([http://www.nps.gov/grca/planyourvisit/upload/River\\_Stats\\_8\\_Year\\_Update.pdf](http://www.nps.gov/grca/planyourvisit/upload/River_Stats_8_Year_Update.pdf)). The review did not mention that our powered concessions river trips have exceeded the 2006 river management plan projections by 81 trips in the 2008 through 2012 seasons, while the do-it-yourself river runners have fallen short by 151 off season trips during the same time period. The review also failed to mention that since the implementation of the completely overhauled permit application system first adopted in 2006, the river program has netted GRCA over \$5,000,000 from self-guided river runners in river related fees. The review did note that in the four winter months November through February, the CRMP has missed its target goals of self-guided user days by 40%, number of self-guided passengers by 50% and number of self-guided trips launching by 25%, but these figures were not seen as a problem worth even mentioning.

It was good to see the eight year review attempted to address four possible changes. Sadly, none of the proposed changes address the problem of unclaimed winter trips. The four changes listed are:

- 1) Modify lottery site to show cancellations when they occur to give advance notice before lotteries are announced.
- 2) Schedule Lotteries at regular times each month (e.g. every 2<sup>nd</sup> Tues – Thurs)

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- 3) Encourage the listing of PATLs (Potential Alternate Trip Leaders) by doubling points on lottery applications that list PATLs. Currently only 18% of applicants list PATLs)
- 4) To help with TAOTS, shorten the noncommercial maximum trip lengths from 21 to 18  
\* for the last half of April and increase the maximum trip lengths from 18 - 21 for the last half of September. \*Exempt trips already scheduled.

We offer the following comments and requests with regards to these proposed changes:

- 1) *Modify lottery site to show cancellations when they occur to give advance notice before lotteries are announced.*

Anything the Park can do to alert river runners that cancelled trips are available is a good idea. We support the NPS in this, and would even like to see an e-mail buy-in allowing individuals who have created a lottery profile to receive an e-mail, should they so chose to do so, announcing the cancelled trip when it is cancelled.

- 2) *Schedule Lotteries at regular times each month (e.g. every 2<sup>nd</sup> Tues – Thurs)*

We have not heard from our constituents that they would find this a helpful change. We would rather see lotteries happening as soon as cancelled trips happen, verses waiting for a set day of the month.

- 3) *Encourage the listing of PATLs (Potential Alternate Trip Leaders) by doubling points on lottery applications that list PATLs. Currently only 18% of applicants list PATLs.*

-The NPS has never released any data showing that the Potential Alternate Trip Leader (PATL) system is even working. The public has no way of knowing how many river trips per year have not launched because they did not identify a PATL. We respectfully request that your office provide us with this data, showing the number of trips that transferred a permit to an assigned PATL, by month, for the last five years.

-The present system sets the total lottery chances to the person with the lowest possible lottery points. Meaning, if two people apply using the PATL system, the Lottery applicant with say, five points, and the PATL with two points, the lottery application will only be awarded two points. We would offer that changing the system to increase lottery points is a good idea. This could be done in a number of ways. For example, the lottery chances could be set at the highest possible points based on applicant points. In the example above, the lottery application would have five points instead of two. Finally, if the NPS was truly interested in assuring trips had an identified PATL, adding a PATL immediately after being awarded a river permit at the time of paying either the \$400 or \$200 permit deposit would be allowed.

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- 4) *To help with TAOTS, shorten the noncommercial maximum trip lengths from 21 to 18 \* for the last half of April and increase the maximum trip lengths from 18 - 21 for the last half of September. \*Exempt trips already scheduled.*

-Of the four proposed changes, this is the most perplexing. Since 2006, we have not heard of a single self-guided river trip saying they wanted the length of their spring river trip to be shortened, or that they were encountering too many other trips in the 280 mile canyon trip. While there is anecdotal evidence that motorized watercraft are taking camps after passing oar powered trips, this activity seems the exception and not the norm. So that we may better understand this issue, we respectfully request a copy of all correspondence the NPS has received in the last 5 years from concessionaires, the concessionaire trade association, commercial passengers, self-guided river runners and any other organization concerning on-river crowding during the first two weeks of May.

-Boating in late April is a wonderful time to be in Grand Canyon with spring flowers in bloom and the weather finally warming up. It is also the time when upstream winds can seriously slow river travel. Shortening river trips in this time period may create additional safety hazard issues for do-it-yourself river runners trying to get through the first 226 miles of Grand Canyon by raft in 18 days instead of 21. Recent flow releases from the Bureau of Reclamation indicate river flows in Grand Canyon will be lower than normal this spring due to drought conditions in the Colorado River basin. We would appreciate a written response explaining how the NPS considered impacts to on-river safety due to spring winds and low water flows proposing to shorten self-guided river trips in the last two weeks of April.

-We would like to also point out that there is a spike in commercial launches during the time period the NPSD notes a Trips At One Time (TAOT) number above the “aimed for 60 TAOT maximum.” We note from page 32 of the November 2005 Final Environmental Impact Statement, Colorado River Management Plan Vol 1, pg 32, the following: “***Camping at the same site or at nearby sites within sight or sound of another group becomes necessary in some places when there are 70 trips at one time, about the maximum current level.***” The NPS only shows one year’s worth of recreational data, the 2013 use levels. It should be pointed out that missing from the launch data are administrative use and science based river trips. These trips are not included in the TAOT data but also impact on-river campsite competition. In 2013, the maximum recreational TAOT for the year is 64, and this occurs only three days in a row. Over the seven day period when this 64 TAOT level is achieved, the average TAOT for the week is 62. TAOT levels exceed 60 in the months of May, June, August and September. We request your office provide us with daily TAOT data for the last 8 years with clear breakouts for concession, administrative, science and self-guided river trips before even considering such a drastic change.

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- It should also be noted that the chart showing 2013 TAOT's indicates TAOT levels are exceeding 60 trips per day at various times throughout the summer. It is very possible this summertime overrun is solely based on concessionaire river trip scheduling variability. If so, it would make more sense to rearrange the concessionaire schedule to avoid a cluster of concessionaire trips launching in the first two weeks of May. We also note that the 2006 Colorado River Management Plan (CRMP) allowed for one concessionaire motor launch per day in April, with three allowed per day in May. It would make sense then to spread the concessions trips out further into late May and early June, when the TAOT drops down to 55, or into mid-August, when the TAOT drops to below 50 for a three week period. We respectfully request your office explain to us why TAOT levels cannot be reduced in the first two weeks of May by re-adjusting the concessionaire launch schedule.
- The NPS proposed change to trip lengths adversely impacts 30 do-it-yourself river trips for an overrun of only 16 trips in the NPS identified period of concern. It seems completely unreasonable to impact twice the number of do-it-yourself river trips required to achieve a desired outcome to a problem possibly caused by other river users. We respectfully request your office provide us with the reasons chosen to impact twice as many self-guided trips as indicated in the 2013 TAOT document provided.
- The NPS has taken great strides to educate river runners about campsite competition and congestion. We greatly appreciate this effort on behalf of your office. Such handouts as the NPS "Action Guide to Preservation" are very helpful educational tools. We respectfully request your office provide us with a review of how the NPS has attempted to get this action guide into the hands of all river trips.
- The NPS offers to lengthen river trips in the second half of September to make up for the decrease in spring trip lengths. This increase in trip lengths from 18 to 21 days is to occur in the last two weeks of September, the start of the motor-free season. Trip length was identified as a very important aspect of the river experience in Grand Canyon (CRMP Technical Memorandum, Shelby and Whittaker, pg 67), and a majority of do-it-yourself river runners perceived increasing trip lengths as a good thing. Overall lottery applications for do-it-yourself river trips throughout the year peak in the summer in a bell shaped curve, with an additional spike in applications, even greater than the summer peak, beginning on the first day of the motor free season starting September 15. In fact, demand for the first and second dates after the motorized watercraft cease operations have risen to over 500 applications for one launch (2012). We respectfully request an explanation as to why there is a need to increase lottery application competition during this time period when applications for this time period is already at a maximum.

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Finally, even if the four NPS proposed changes were all implemented, it would appear that none of the changes proposed would do anything to assist self-guided river runners in not losing out on another 150 launches over the next 5 years. We greatly appreciate your office taking the time to provide us with the data requested. We keenly await your timely reply to our concerns, and would be glad to meet with your staff in order to achieve a productive resolution to our concerns.

Sincerely,

Tom Martin, Co-Director  
River Runners for Wilderness  
PO Box 30821  
Flagstaff, AZ 86003

CC: The Honorable Ann Kirkpatrick, Arizona Congressional District 1, Attn: Legislative  
Director Ken Montoya