

RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING Rivers

Steve Martin
Superintendent
Grand Canyon National Park
PO Box 129
Grand Canyon, Arizona 86023

August 27, 2007

Dear Superintendent Martin,

It was a pleasure to meet with you May 2, 2007, when we got together to introduce you to River Runners for Wilderness. With over 2,000 members throughout the country, River Runners for Wilderness is committed to wilderness protection, with equitable public access as a component of sustainable wilderness resource management.

With almost a year's worth of data collected on how the new Colorado River Management Plan (CRMP) is or is not working, we have concerns about the operation of some of the programs components. We would like to see the following changes be implemented at this time using the Adaptive Management flexibility of the CRMP:

The lottery fees for self guided river permits are excessive.

No other river access lottery in the country charges such a high yearly entrance fee. In the case of Grand Canyon, the parks own estimates project the majority of successful applicants will have to apply to the lottery for a decade or more to obtain a primary season permit. The annual lottery application fee, presently \$25, should be kept to the absolute minimum, if required at all.

We recommend either a free applications to all lotteries, as is done for the San Juan River in southern Utah, or, charge a one time fee, not to exceed \$25, good for as long as the applicant applies yearly for any lottery and is unsuccessful in obtaining a launch date.

These fees were instituted without any public transparency as to where this lottery application money is being spent. Could you please provide us with the following information; 1) How much of this money is being spent on the lottery permit program and how much of this money is being spent on other non-related programs, and 2) What are the real costs of running the lottery program?

Remove the one trip a year rule.

There is no substantive data showing repeated visitation limits access to other self guided river trip participants. This is especially true in that self guided trips have been transferred to a launch based system instead of a user day system, and recent data on trip launches from Lee's Ferry clearly shows many self guided trips are not launching at their allotted group size and trip length maximums.

NPS data from 1998 through 2002 demonstrated that only 1.21% of all self guided river runners participated in more than 5 non-commercial river trips in the 5 year period 1998 to 2002, while

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96.23% of all self guided river runners participated in 3 or less non-commercial river trips in the same 5 year period 1998 to 2002.

In combining the new with the old data, it should be evident that adding a trip participant who has visited the resource already in the calendar year does not restrict any one else's access.

While we understand the NPS keeps a data base of all self guided river trip participants, how is the NPS maintaining a database for commercial passengers? Without a commercial passenger data base, how does the park know if a self guided river trip participant has or has not had already participated in a concessions trip? Likewise, how is the one trip a year rule as it stands enforceable in the commercial sector? It is our understanding that there is no direct NPS oversight of concessionaire passenger repeat use. Is this correct?

An immediate benefit to eliminating this rule would include freeing up limited NPS resources as law enforcement personnel would no longer have to check photo IDs of all trip participants at the Lee's Ferry boat ramp.

Add extra points for losing the lottery, not for staying away.

The points awarded in the lottery should accrue for lotteries lost, not years staying away from the resource.

As the lottery is run now, successful lottery winners are biased toward those who have five or more years away from the resource, without up-to-date knowledge of the resource. This lack of knowledge about the resource does not show NPS leadership in promoting the highest standards of resource protection.

This simple change would award lottery losers with better chances the following year. This change would not affect Waiting List participants use of their "years on the waiting list" points in the lottery.

Thank you for your time in these matters, and we look forward to working with you on these issues in the near future.

Sincerely,

Tom Martin, Co-Director
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