

# RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING RIVERS

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

January 13, 2016

Dear Superintendent Uberuaga,

Founded in 2002, River Runners For Wilderness (RRFW) represents a broad spectrum of river runners, wilderness lovers and American citizens who care about the wilderness river resources in the Colorado River watershed. Our members, now numbering over two thousand with outreach to over 10,000 whitewater enthusiasts, continue to have a deep concern for the future of the wilderness values of the Colorado River watershed and the management of these national treasures.

Thank you for your letter of August 21, 2015. We wanted to wait to respond to your well-articulated letter until after our November-December river trip, as we find on the ground observations most helpful in formulating continued discussion points for the ongoing issues within the Colorado River Management Plan.

As you know, since 2007, River Runners For Wilderness has been corresponding with your office, seeking adaptive management changes in the winter season when there are no concessions services. The changes we have proposed include increasing do-it-yourself (DIY) trip lengths to the pre-2006 river management plan length of 30 days to Diamond Creek, a simple elimination of the one trip per year rule, and decreasing the river access fees. We are heartened to hear that your office is continuing to look at these options.

The concept has always been a simple one of making the permit process and access to winter river trips more attractive, so that once awarded, the permit holder does not cancel the permit in the first place. We continue to hear reports that permit holders sit on a permit and not return the permit to the NPS as a way to protest the present system. While we certainly hope this is not the case, there is no positive incentive, such as a re-imburement of fees collected, lengthened trip and elimination of the one-trip-per-year requirement, etc., to encourage the permit holder to turn their permit back in to the NPS or to complete their trip.

It has been and is still our view that the year round restrictions are too restrictive, especially in the winter concessions-free season. We at RRFW can only continue to encourage your office to experiment with making the permit process less restrictive, and then see if the winter cancellations decrease.

# RIVER RUNNERS FOR WILDERNESS

## A PROJECT OF LIVING RIVERS

One of the changes your office has implemented has been to add up to 20 unused noncommercial launches (last minute cancellations) to the subsequent year's list of available dates and that these permits will be made available through lotteries to the public. Your letter noted that launches will be scheduled in the subsequent year near the date of the original planned launch.

We are well aware that there are many moving parts to this management plan, and by adding up to 20 unused noncommercial launches, the December and January calendars now have occasional double launches. This is unfortunate, especially in December and January, when the CRMP intended there to be only one launch a day. Again, we encourage your office to look at attractive ways to adapt the CRMP so that permit holders do not cancel the permit in the first place.

It is encouraging to see your office begin to soften its stance on the addition of an alternate trip leader to a DIY river trip. We offer that in the winter, any need to change permit holders, up to the day of launch, should be acceptable. Again, the goal is to decrease the hurdles to a successful launch and river trip. As we stated last year, in the pre-2006 river management plan, the NPS had the option of assigning the trip permit to any individual over 18 years of age identified by the permit holder as an alternate on a case by case basis, as need arose. We still encourage your office to return to the option of assigning the trip permit to any individual over 18 years of age identified by the permit holder as an alternate trip leader on a case by case basis, as need arises, especially in the winter.

Thank you for your rationale for increasing concessions group sizes in the fall. We do not support increasing river concessionaire group sizes in the spring and fall shoulder seasons from 24 to 32, and so respectfully disagree with this change. Your letter noted "While some commercial trips in the shoulder season may be larger than previously allowed, a corresponding number of other commercial motorized trips may either operate with reduced sizes or be eliminated altogether." While we appreciate that, it is possible that the river concessions would have continued to operate trips with group sizes of 24 and operate motorized trips with a reduced size or eliminate these trips altogether. If the concessions are unable to book their end season motor trips, our opinion is this should not be a reason to increase their trip sizes in the motor free season.

Thank you for explaining how the river concessionaires overrun of the TAOT numbers during a time of ramp down is not likewise afforded to the do-it-yourself river runners during a time of ramping trips up. We cordially agree to disagree on this as well. Our view of this is that preemptive action is being taken on do-it-yourself trips that is not being imposed on the river concessionaires.

As to our recent river trip, we noted a number of issues we would like to relate to you and your team. Recently, your office was notified by e-mail expressing appreciation that Ranger Kolar changed the language on the bulletin board to reflect the Non Commercial River Trip Regulations with regards to exchanges at Phantom Ranch. This brings up the issue of inner gorge safety and

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crowding at Phantom Ranch. It is our view that eliminating camping between Hance and Mule Dust camps between March 1 and October 31 to all river trips without exchanges is too restrictive and a safety issue. We would like your office to consider abandoning the closure season altogether and “Recommend trips without exchanges avoid camping in this area between April 1 and October 31 if at all possible.”

The regulations also state that at the Lee’s Ferry launch ramp, even when only one trip is to rig at the ramp as in December and January, only two vehicles at a time are allowed on the ramp for unloading purposes at any one time. We hope you agree that this is overly restrictive. On days when there is only one trip rigging, the Lee’s Ferry Rangers are aware of this. Would your office consider lifting the two vehicle limit on the days when only one trip launches?

Our throwable cushions were inspected at Lee’s Ferry with a fine tooth comb. While we are accustomed to and appreciate the inspection of our life jackets, it was a surprise to see the throw cushion inspection. Regrettably, we did not pass that one. A quick phone call to Flagstaff and we were able to arrange cushions that passed inspection. Throw cushions on our river trips are used as tickets to the bathroom and cooler seat cushions. In cases of emergency, throw cushions lie idle as we scramble to get our throw-ropes. We understand that the US Coast Guard regulations apply here, and we note that in:

Canyonlands National Park, which oversees Cataract Canyon, their Noncommercial River Regulations state “A serviceable, type IV throwable device (throw cushion) for every boat 16 feet or more in length. A commercially made throw bag with at least 40 feet of line is allowed in lieu of a type IV throwable device.”

Dinosaur National Park, which oversees Lodore Canyon, Split Mountain and the Yampa, notes in their Noncommercial River Regulations “One throw able Type IV device, seat cushion, or throw bag per boat 16’ or longer is required.”

Westwater Canyon, managed by the Bureau of Land Management, is also under USCG oversight. The BLM Westwater river regulations note “Each boat 16 feet or longer must have a type IV throwable device or a commercially made rescue rope with at least 40 feet of line”.

Grand Canyons NCOR’s are the exception and note “A throwable cushion (U.S. Coast Guard approved, Type IV) is required for each watercraft 16 feet in length and over.”

As you can see, the Grand Canyon regulations do not allow for a throw bag in lieu of a throw cushion. Clearly, the Canyonlands, Westwater, Lodore, Yampa and Split Mountain regulations must be following USCG advisories, and we would much rather our throw bags be inspected with a fine tooth comb, since we actually use these devices. Could your office please explain what steps need to be taken to amend the GRCA NCOR’s to reflect the Canyonlands, Dinosaur and Westwater language in regards to the use of throw bags in lieu of throw cushions?

In 2015, we noted increased Hualapai River Runners day tour activity both launching at Diamond Creek and on the river at the floating docks at Mile 262 at what is now the busiest heliport on the planet. It appears that the limits set in the 2006 Colorado River Management Plan have been

# RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING RIVERS

exceeded. What will your office be doing to freeze Hualapai river activities at their present levels while you sort out the road ahead?

The Hualapai Nation has implemented a \$32.55 per person camping fee to camp along the river at specific campsites, where the river bounds the Hualapai Nation. This is their right, to do with on their land. That said, the National Park Service has been charged with legal authority to oversee all use on the Colorado River in Grand Canyon, from Lee's Ferry to River Mile 277.5. Has your office looked at the ramifications of the Hualapai collecting such a fee for camping on river left, and the potential impacts to river runners from National Canyon to river mile 273.9? Does Grand Canyon National Park collect user fees from the passengers on Hualapai river trips that use and impact Grand Canyon National Park? This impact is clearly evident at Columbine Falls where a new trail has been constructed from the river to the falls.

Thank you for your time in addressing these ongoing components of Colorado River management in Grand Canyon National Park. We look forward to your response to the concerns we have raised.

Sincerely,



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