

RIVER RUNNERS FOR WILDERNESS

A PROJECT OF LIVING RIVERS

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

June 30, 2015

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 e-mail of April 3, 2015, in which you announced three “administrative changes to provide greater flexibility for Grand Canyon river trips.”

Your e-mail noted the following:

1. The summer maximum group size of 32 for commercial trips will be extended through the shoulder season (April 1 through October 30th). This will allow outfitters to operate more efficiently without increasing their annual number of launches, passengers, or user days. The number of commercial user days will remain unchanged.

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. Your office has provided us use figures demonstrating that in the winter season the self-guided river runners are using half the National Park Service (NPS) projected user days. The changes we have proposed since 2007 include increasing do-it-yourself (DIY) trip lengths to the pre-2006 river management plan length of 30 days to Diamond Creek, elimination of the one trip per year rule, and decreasing the river access fees. These changes suggested for the DIY river runner would increase the quality of the river trip “without increasing their annual number of launches, passengers, or user days.”

These simple and minor changes were not implemented as the river concessionaires were opposed to them. These changes have yet to be acted on by the NPS, while immediate consideration has been afforded the river concessionaries without asking other constituents for feedback on the river concessions desired assistance.

We do not support increasing river concessionaire group sizes in the spring and fall shoulder seasons from 24 to 32. The DIY group size maximum is 16 people for this same time period. These periods of time have been set aside for a more wilderness compatible experience. This increase in river concessions group size will increase attraction site crowding and on river contacts.

Your e-mail then noted:

2. Up to 20 unused noncommercial launches (last minute cancellations) will be added to the subsequent year’s list of available dates and made available through lotteries to the

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public. Launches will be scheduled in the subsequent year near the date of the original planned launch.

After pointing out to your office for over five years that on average, 20 DIY winter river trips are unable to launch yearly, we are thankful to see your office is now recognizing this fact. We have repeatedly suggested your office decrease the hurdles placed before do-it-yourself river runners in obtaining these trips.

As we have previously mentioned, there is no reason that the hurdles to obtaining a permit should be the same year round. Instead of adding in more trips in the following year, we continue to encourage your office to consider making the winter river trips more attractive in the first place, such as removing the one trip per year rule in the winter, increasing trip lengths in the winter, and decreasing winter river trip fees. Clearly, the demand for do-it-yourself summertime river trips compared to winter time trips, based on lottery application figures, demonstrates the hurdles to obtain a winter permit are too restrictive.

Your e-mail of April 3 then notes:

3. Noncommercial permit holders will also be allowed to add qualifying family members as additional potential alternate trip leaders after the trips are awarded.

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. In correspondence we sent to your office in 2013, we pointed out that only allowing river runners to identify a Potential Alternate Trip Leader (PATL) at the time of the lottery for permits, often a year and a half in advance of the trip launch, made no sense. Of course, it also made no sense that by identifying a PATL in the lottery, the applicant's chances of lottery success actually decreased.

As you know, 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. As recently as one month ago (May, 2015), a do-it-yourself trip was denied the ability to launch a week prior to launch date when the permit holder had a death in the family, had not identified a PATL during the lottery, and had no family member on the trip. Fifteen individuals, all with vacations planned and substantial financial investments made, were denied a permit to launch by your employees.

We encourage you 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.

On a separate matter, it has come to our attention that the NPS has decreased its rigid adherence to not exceeding trips at one time (TAOT) for the concessionaires. The 2015 Commercial Operating Requirements note: (Pg 28) "The Service understands it is impossible to immediately ramp down TAOTs from 35 on September 15th to 17 TAOTs on September 16th or from 17 TAOTs on September 30th to 8 TAOTs on October 1st. Therefore, Concessioners may exceed the Sept 16 to Sept 30 TAOT limit as needed to ramp down use to the 17 TAOT level by the end of the month, and the October TAOT limits may similarly be exceeded for the first half of October."

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In 2014, the NPS announced they were considering shortening do-it-yourself trip lengths or entirely removing DIY trips from the launch schedule to not cross the identified TAOT limits in the spring. Could your office please explain why consideration for 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?

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,



Tom Martin, Co-Director
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