

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

June 15, 2009

Dear Superintendent Martin,

With now three years of substantive data collected on the 2006 Colorado River Management Plan (CRMP), River Runners for Wilderness would like to take this opportunity to once again express our concerns about the CRMP. As you know, River Runners for Wilderness, with over 2,000 members throughout the country, is committed to wilderness protection, with equitable public access as a component of sustainable wilderness resource management.

In August 2007, we noted changes we would like to see implemented using the Adaptive Management flexibility of the CRMP. Almost two years later, we note the following:

There is no adaptive management in the CRMP for the general public.

We note that not one of our suggestions from two years ago has been implemented, nor has any other management change been implemented that would benefit the do-it-yourself river runner, while concessions use has increased. It appears to us that given the increases in concessions passenger counts, adaptive management is working for the concessions, but has so far failed the general public who conducts their own river trips in Grand Canyon.

The lottery fees for self guided river permits are still excessive.

No other river access lottery in the country charges such a high yearly entrance fee. In the case of Grand Canyon, the park's own estimates projecting that the majority of successful applicants will have to apply to the lottery for a decade or more to obtain a primary season permit are proving true if not underestimated. The annual lottery application fee, presently \$25, should be kept to the absolute minimum, if required at all, especially in these hard economic times.

We still 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 \$5, good for as long as the applicant applies yearly for any lottery and is unsuccessful in obtaining a launch date.

Grand Canyon's lottery fees were instituted, and are now collected, without any public transparency as to where this lottery application money is being spent. In 2007 we requested 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? To these unanswered requests, we would also like to know how much money has been collected in lottery fees for each year's lotteries, both the main lottery and all subsequent lotteries.

Remove the one trip a year rule.

As in our 2007 request, we once again note there is no substantive data showing repeated visitation limits access for 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. Three years of data on trip launches from Lee's Ferry clearly shows self guided trips are under their allotted group size and trip length maximums. While the river concessionaires are roughly 800 individuals over their projected passenger count, the general public that does not use concessions services is roughly 750 individuals short of the NPS-CRMP projections.

NPS data from 1998 through 2002 demonstrated that only 1.2% of all self guided river runners participated in more than 5 non-commercial river trips in the 5 year period 1998 to 2002, while 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 would not restrict anyone 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" enforceable in the commercial sector? It is our understanding that there is no direct NPS oversight of concessionaire passenger repeat use. Is this correct? These questions were not answered two years ago. We are still requesting answers to these questions.

As we noted in 2007, 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.

As in 2007, we still request that the points awarded in the lottery should accrue for lotteries lost, not years staying away from participating in a commercial-free river trip.

The present lottery is biased toward those who have five or more years away from the river, without up-to-date knowledge of the resource. This lottery produced lack of knowledge about the resource does not reflect NPS leadership goals of 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.

Return to the 18 day summertime trip length.

We continue to hear from river runners that the 16 day summertime trip has severely impacted the quality of the Grand Canyon River experience. River runners note that in the summer there is increased campsite competition, loss of a layover possibility, and a decreased safety margin. We are also hearing that in the spring, when the allowable trip length transitions from 21 days to 16 days, the shorter trips are complaining they are running into the longer trips. We encourage the NPS to return to the summertime do-it-yourself trip length to 18 days to Diamond Creek, and return the winter trip length to 30 days to Diamond Creek. We do not support shortening the 21 day trips in the spring.

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

Sincerely,

Tom Martin, Co-Director
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