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December 5, 2009

Mr. Steve Sullivan, Permits Office
Grand Canyon National Park
c/o Coconino County Forest Supervisor's Building
1824 S Thompson St.
Flagstaff, AZ 86001

Dear Steve,

Thank you so much for taking the time to talk to me a few weeks ago about the draft change in the one-trip per year rule. Discussions about this issue have occurred between Grand Canyon River Guides' officers and directors, as well as between GCRG and other river user groups such as the Grand Canyon River Outfitters Association, the Grand Canyon Private Boaters Association, and the Grand Canyon River Runners Association. At this time, we would like to provide you with GCRG's perspectives -- observations that are firmly grounded in our highest priorities: protecting Grand Canyon and the Colorado River experience.

The CRMP was implemented less than three years ago: Grand Canyon National Park is still in the early stages of this ten-year management plan that was as massive in scope as it was contentious. We would also like to point out that the waiting list is still in play, which in turn means that the lottery system has not been used to its full potential. Even so, many boaters believe this is vastly improved compared to the old system, and the Park has created more opportunities for people who want a Colorado River trip. Overall, the plan has been working remarkably well. Changes seem premature at this time.

If people don't use the access they have, that's not necessarily a bad thing: Although GCRG did not agree with the increase in use engendered by the CRMP, once the EIS was finalized, we lent our support to Grand Canyon National Park to ensure a successful implementation of the plan. Therefore, because of our original stance and based on our continued belief that the resource is

already at or beyond carrying capacity, we do not view unused dates as a problem to be fixed. And it may, as you acknowledged, self-correct over time as river runners reapply for winter trips and/or the economy improves.

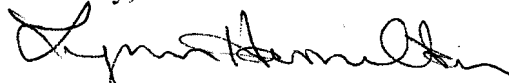
Simple and universal rules are best: In light of the pre-CRMP discord between river user groups, rules that are universally applied and easy to understand are a necessity. Making exceptions can be a slippery slope with unintended consequences. Once you make one exception, groups will interpret that as the “green light” to ask for more. Where does it end?

Maintaining positive relationships between major user groups is essential: Groups such as GCRG, GCROA, GCPBA, and GCRRA have enjoyed an unprecedented level of cooperation and communication since the CRMP was implemented. Even a seemingly simple change to the one-trip-per-year rule could conceivably jeopardize those relationships and create arguments about allocation and equity down the line. Although we will not always be in agreement on all issues, maintaining positive relationships among user groups is a factor in the success of this Colorado River Management Plan as well as future planning cycles.

With these thoughts in mind, GCRG would like to see the Colorado River Management Plan run for at least a full five years before any assessment would be made. This would allow: 1) the waiting list to run out, 2) the lottery system to work on its own, 3) the economy to recover, and 4) sufficient data for an analysis of resource impacts resulting from the CRMP revision. However, this should not be construed to mean that an assessment would necessarily result in change. *This issue really calls into question the protocols for the adaptive management component of the CRMP* – how and when that concept comes in to play, as well as the role and extent of river stakeholder involvement in decision-making. The park’s adaptive management approach to review and revise visitor use prescriptions within the CRMP has been largely undefined – a concern GCRG expressed in our official DEIS comments. Perhaps this is a good opportunity to closely examine that concept and involve stakeholders in those discussions. We would certainly welcome the prospect.

The Park’s postponement of a decision on this proposed change and your willingness to accept feedback is *very* much appreciated. GCRG is fully invested in providing the NPS with input that will help protect park resources for the life of the plan. Philosophically, this complements park responsibilities as reaffirmed in the 2006 revision of the NPS Management Policies which clearly underscore that *“when there is a conflict between use and conservation, the protection of the resources will be predominant”* – a policy that is particularly relevant to this situation. As river stewards, we see ourselves as partners with Grand Canyon National Park, working together to protect and conserve park values for future generations to enjoy. We offer our perspectives in this spirit of cooperation, and look forward to working together towards a positive solution.

Sincerely,



Lynn Hamilton
Executive Director

And

The Officers and Board of Directors of
Grand Canyon River Guides, Inc.

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cc: Palma Wilson, Deputy Superintendent, Grand Canyon National Park
Steve Martin, Superintendent, Grand Canyon National Park ✓