



December 3, 2009

Steve Martin, Superintendent  
Grand Canyon National Park  
P.O. Box 129  
Grand Canyon, AZ 86023

*SM*



**FILE**

Mark Grisham  
Executive Director

**MEMBERS**

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Adventures, Inc.

Arizona River  
Runners, Inc.

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Expeditions, Inc.

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Tour West, Inc.

Western River  
Expeditions, Inc.

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**RE: PROPOSED ONE-TRIP-PER-YEAR RULE MODIFICATION**

Dear Superintendent Martin:

As you are aware, GCROA and the river concessioners were informed during this year's annual NPS / outfitter meeting of your decision to modify the one-trip-per-year rule so as to allow non-commercial boaters who undertake a trip during the spring, summer or fall to accompany a second trip launching on certain winter dates. Public announcement of this decision was at the time scheduled to occur five days later at a Grand Canyon Private Boaters Association meeting.

In response to a joint request from GCROA and our river community colleague groups, which include Grand Canyon River Guides, Grand Canyon River Runners Association and GCPBA, we were very appreciative when you agreed to postpone your decision on this issue pending the Park's receipt of additional feedback and a possible subsequent reconsideration of this proposal. We are grateful for your response in this regard and thank you again.

After discussing this issue at length both internally and with our colleague groups, GCROA's feedback on this matter is as follows. Our view is that the one-trip-per-year rule has been an instrumental element of the revised CRMP's impressive success. While the suggested modification may at first seem somewhat minor, it relates directly to one of the most sensitive aspects of the new river plan, the allocation of use or the relative "demand" question. We urge, therefore, that the NPS exercise great care when addressing this matter.

While we recognize and understand the underlying issue, we join with our colleague groups in expressing the view that it may simply be premature to begin modifying important elements of the new river plan that lie at the heart of the central issues. We feel it makes better sense to first gain more experience with the new system. While we strongly concur with the broad river community view that the new river plan is proving to be quite successful, it is still early in the game and there are residual sensitivities lingering from the debates and controversies of the past that perhaps are better left undisturbed at this early juncture.

Further, last winter's non-commercial use pattern may prove to be anomalous. It was a peculiar year, after all, for several reasons. In short, with really only one winter to examine at this early stage of implementation, no one can be sure yet what may or may not become a pattern. Given this and the associated sensitivities, and the potential unintended consequences that might emanate from a one-trip-per-year rule modification, our recommendation is that the NPS wait until more experience is gained before implementing any changes of this type.

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Finally, as we continue to express our thanks and gratitude for your decision to delay implementation of the rule modification, we must also express a bit of concern with how this issue was handled originally. This, of course, raises the larger question of how the NPS will manage or pursue questions of CRMP adaptive management generally.

As this recent experience seems to indicate, in situations where the NPS is reviewing potential modification of key elements of the CRMP, particularly those that touch on sensitive aspects of the plan, perhaps a more structured or formal approach is advisable. Everyone benefits when a strong sense of inclusiveness for all concerned is maintained. We know full well that this is sometimes easier said than done. As always, we do not envy your challenges and responsibilities and we know that you appreciate and value our community input.

For our part, GCROA is committed to continuing to collaborate and partner with our river community colleague groups to the maximum extent possible. This does not mean that we will see eye-to-eye on every issue or that this is even desirable. But it does mean that we are serious about working together in a productive and constructive way. We believe that this approach is good for the public we serve, good for the river community at large, and good for the NPS as you continue with the difficult and challenging job of managing the river within the Park. It will greatly aid this process if any future CRMP adaptive management occurs in an open way with plenty of forewarning.

Thank you very much for considering these comments and recommendations. And thank you again for your decision to delay any potential modification of the one-trip-per-year rule until after the NPS has the opportunity to review additional community feedback on this proposal.

Respectfully,

A handwritten signature in cursive script, appearing to read "Mark Grisham".

Mark Grisham