

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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Arizona River
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Tour West, Inc.

Western River
Expeditions, Inc.

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mark@gcroa.org
www.gcroa.org

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 black ink, appearing to read "Mark Grisham", written in a cursive style.

Mark Grisham



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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.

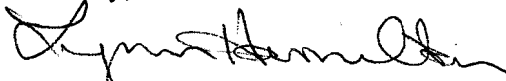
Simple and universal rules are best: In light of the pre-CRMP discord between river user groups, rules that are universally applied and easy to understand are a necessity. Making exceptions can be a slippery slope with unintended consequences. Once you make one exception, groups will interpret that as 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 ✓



Grand Canyon River Runners Association

preserving public access to the Colorado River

December 9, 2009

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

Dear Superintendent Martin:

GCRRA would like to take this opportunity to offer our comments on the recently proposed modification of the one trip per year rule. After discussing this proposal with our river community colleagues, GCROA, GCPBA & GCRG, we are in agreement that it is too soon to make a change of this sort to the CRMP. As you know, the one trip per year rule was implemented to address questions concerning demand vs. access. It was agreed that the rule should cover both the commercial and non-commercial sectors to make it equitable. As we all know significant thought and effort went into the planning process. Changing this rule after only a short period of implementation and without a sufficient amount of data seems premature and we are pleased that the Park has agreed to reconsider this action pending further discussion.

On a positive note, it is good to know that the NPS is willing to listen to the river community before it makes any major decisions with the CRMP. We realize how difficult it is for the NPS to involve the many groups in management decisions; however, we feel that involving the major stakeholder groups in changes of this magnitude can only be beneficial for all sides. In conjunction with this we feel it would be helpful if the adaptive management process could be better defined so that we can understand how it will work for future issues.

We look forward to continuing this discussion not only with the NPS but within the river community. As we all learned in the planning process, open lines of communication benefit everyone.

Sincerely,



Pamela Whitney
Vice President

Board of Directors

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