



United States Department of the Interior



NATIONAL PARK SERVICE
GRAND CANYON NATIONAL PARK
P.O. BOX 129
GRAND CANYON, ARIZONA 86023-0129

IN REPLY REFER TO:

L34 (GRCA 8211)

AUG 21 2015

Tom Martin
River Runners for Wilderness
P.O. Box 30821
Flagstaff, Arizona 86003

Dear Mr. Martin:

Thank you for your letter of June 30, 2015, providing River Runners for Wilderness' (RRFW) comments on changes to Grand Canyon National Park's (Park) river permitting system, changes which were announced on April 3, 2015. In your letter you raised a number of concerns regarding the implementation of the Park's 2006 Colorado River Management Plan (CRMP).

I appreciate the opportunity to address your concerns, beginning with your question regarding ramping of private trips' trips-at-one-time (TAOT) maximums during early May. Reducing maximum TAOT numbers to 60 was one of the hallmark goals of the CRMP, and a consistent variance to this has occurred each year, as May launches increase during a period when longer April trips are still on the water. The Park has considered several methods to adjust use to eliminate this excess, including reducing some trip lengths or eliminating some launches from the late April or early May calendar. As you noted, both have drawbacks. A third option, and the one we have chosen to use thus far, is to allow and monitor this variance into the future unless resource impacts require us to consider other actions. This third option is the one that we will continue operating under until we find a better answer.

The fall-season TAOT ramp down you noted is not a recent change, but rather has been in place since implementation of the CRMP in the 2008 commercial river contracts. The language quoted was in place in the 2008 Commercial Operating Requirements and has not changed since 2008. While the CRMP did emphasize a 60 TAOT maximum at high season, the CRMP did not intend to remove high-season trips from the water instantaneously to ensure immediate ramp downs to seasons with lower use. Consequently, the fall-season ramp down was established at the start of CRMP implementation, and is not a recent change as your letter suggests.

You have stated that RRFW believes that the increase in commercial shoulder season maximum group size will increase attraction site crowding and on-river contacts. National Park Service (NPS) staff specifically considered how the group size change would affect these aspects of a river trip.

The primary factors affecting attraction site visitation and river encounters are trips at one time (TAOT), and people at one time (PAOT). The commercial maximum group size adjustment from 24 to 32 in the shoulder months would have no upward effect on TAOT in the shoulder or peak seasons, as launch limits will remain the same. PAOT at attraction sites are not expected to exceed standards set forth in the CRMP, as the number of launches in the shoulder season will still be well under the maximum allowed overall.

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The commercial sector must also adhere to user day totals throughout the season. While some commercial trips in the shoulder season may be larger than previously allowed, a corresponding number of other commercial motorized trips may either operate with reduced sizes or be eliminated altogether.

The NPS also has recognized since the inception of the CRMP that each year a number of private winter launches have gone unused due to late cancellations. We appreciate your suggestions regarding additional ways the NPS might address unused winter launches, and may consider these further. For now we are interested in monitoring the success of the current change.

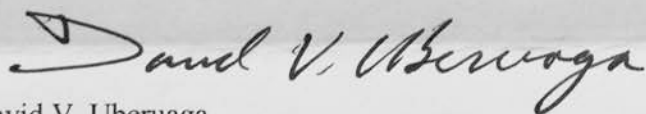
The NPS is encouraged by the generally positive response of the boating community to changes to the Potential Alternate Trip Leader (PATL) rule to include family members. We continue to stress that identifying a PATL in the lottery is a significant protection from situations in which a trip must be cancelled at the last minute due to the lack of a PATL. We will be interested to observe how the rule change affects last-minute cancellations, and will continue to monitor the success of the change.

Referring to requests from RRFW and others for increasing do-it-yourself trip lengths to 30 days to Diamond Creek, eliminating the one trip per year rule, and decreasing river access fees, you stated that "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 concessionaires without asking other constituents for feedback on the river concessions desired assistance."

The NPS has spent considerable time evaluating the requests for changes to the CRMP submitted by RRFW, Grand Canyon Private Boaters Association and Grand Canyon River Outfitters Association, as well as other entities. Simply because we have not implemented a requested change does not mean we have not fully discussed and explored it. The concessioners' support is not necessary or sufficient to make any change, or to refrain from making it if we consider it in the best interests of park resources and visitors.

Thank you for your comments. I appreciate your dedication to the Colorado River and Grand Canyon National Park. If you have further questions or concerns please contact Concessions Specialist Laura Shearin at (928) 638-7351, or Permits Program Manager Steve Sullivan at (928) 638-7415.

Sincerely,

A handwritten signature in cursive script that reads "David V. Uberuaga". The signature is written in dark ink and is positioned above the typed name and title.

David V. Uberuaga
Superintendent