



# 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:

A9031 (GRCA 8211)  
FOIA GRCA 2014-02

**MAY 15 2014**

Tom Martin  
River Runners for Wilderness  
PO Box 30821  
Flagstaff, Arizona 86001

Dear Mr. Martin:

Thank you for your letter concerning river permit management for non-commercial river trips. Because of the nature of your inquiry, including a request for correspondence received by the park, a portion of your request for information has been processed as a request for records under the Freedom of Information Act (FOIA). However, the portion of your letter asking for an interpretation of existing policy and regulations, (and potential future changes in policy), is being answered by a separate letter. You will receive that letter in a separate mailing.

Enclosed with this letter you will find the records, as noted above, responsive to your request. In these records personally identifying information has been redacted. Although some of this information may be known to you through other means, because the information you have requested is maintained in a Privacy Act system of records, we are required under the FOIA to redact the information. Specifically, exemption 6 [5 U.S.C. 552(b), (6)] protects the personal privacy interests of individuals.

It is the policy of the National Park Service (NPS) to: (1) make records of the NPS available to the public to the greatest extent possible in keeping with the spirit of the FOIA; (2) make documents requested under the FOIA available at the earliest possible date while, at the same time, protecting the rights of the individuals involved and the administrative processes surrounding such rights; and (3) withhold documents falling within one of the FOIA exemptions only if disclosure is prohibited by statute or Executive Order.

Your request was processed under the provisions of the Freedom of Information Act (5 United States Code 552 as amended by Public Law 104-231, 110 Stat. 3048); United States Department of the Interior (Department) implementing regulations found at 43 Code of Federal Regulations Part 2, Subparts A through E, PUBLIC LANDS: INTERIOR, beginning at 2.1; and the Privacy Act of 1974 (Public Law 93-579). Please be advised that additional FOIA and/or Privacy Act guidance/regulations may also be found at either the Department's web site, [www.doi.gov/foia](http://www.doi.gov/foia), or the United States Department of Justice site, [www.usdoj.gov](http://www.usdoj.gov). For your further information, Congress has excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. [See 5 U.S.C. § 552 (c) (2006 & Supp. IV 2010)]. This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all requestors and should not be taken as an indication that excluded records do, or do not, exist.

The following attorney was consulted during the preparation of this response: Michael C. Williams, Attorney-Adviser, Santa Fe Unit, Southwest Region, Office of the Solicitor, U.S. Department of the



Interior, P.O. Box 1042, Santa Fe, NM 87504-1042. If you consider this response to be a denial of your request, under 43 CFR 2.57, you also have the right to appeal. You may file an appeal in writing to:

Freedom of Information Act Appeals Officer  
Office of the Solicitor  
U.S. Department of the Interior  
1849 C Street, NW  
MS-6556-MIB,  
Washington, D.C. 20240  
foia.appeals@sol.doi.gov

Your appeal must be received no later than 30 workdays after the date of this final response. The appeal should be marked, both on the envelope and the face of the appeal letter, with the legend, "FREEDOM OF INFORMATION APPEAL." Your appeal should be accompanied by a copy of your original request and copies of all correspondence between yourself and the National Park Service related to this request, along with any information you have which leads you to believe this response was in error.

Also as part of the 2007 OPEN Government Act FOIA amendments, the Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a nonexclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation.

You may contact OGIS in any of the following ways:

Office of Government Information Services (OGIS)  
National Archives and Records Administration  
Room 2510  
8601 Adelphi Road  
College Park, MD 20740-6001

E-mail: [ogis@nara.gov](mailto:ogis@nara.gov)  
Phone: 301-837-1996  
Fax: 301-837-0348  
Toll-free: 1-877-684-6448

If you have questions regarding this response, you may call me at (928) 638-7945. You may also contact Jack O'Brian, FOIA Officer at (303) 969-2062, or Ms. Charis Wilson, NPS FOIA Officer, (303) 969-2959, or by mail 12795 W. Alameda Parkway, PO Box 25287, Denver, Colorado.

Sincerely,



Robin Martin  
Acting FOIA Officer

Enclosure

cc: Jack O'Brian, Charis Wilson

GRCA 8211 PALE 2

Concessions for reply  
— please reply to the writer,  
cc: to Congressman Smith's of

(b) 6

Austin, TX 78730  
May 13, 2012

Hon. Lamar Smith  
Texas Congressional District 21  
2409 Rayburn House Office Building  
Washington, DC 20515



cc: DLentz  
R. Martin  
M. McGinnis

Re: Actions by Western River Expeditions motorized river trip on Grand Canyon

Dear Congressman Smith:

We recently completed a non-commercial river trip on the Colorado River through Grand Canyon National Park with a launch date of March 29, 2012. I was the Trip Leader. On April 11, a single motorized boat overtook us, a Western River Expeditions (WRE) "J-rig," at about river mile 206 at about 5:00pm. We had been pushing hard all day against a serious headwind, starting at Whitmore Wash (mile 188), trying to make Granite Park at mile 209 for our planned layover camp, a tough 21-mile day. We had seen the helicopters come in at Whitmore Wash that morning, and this rig obviously came from there.

We hailed the boatman and asked where he planned to camp. When he told us Granite Park at mile 209, I entreated him, saying, "Please don't take 209! We are desperately trying to get there because that is our layover camp. We plan on climbing the mountain (2000-ft climb from there) tomorrow." He replied that they had some maintenance to do. I reiterated that it was our layover camp, that we had been fighting the wind all day to get there, and could he please take another camp. His response: "If we get there and it is empty, we may take it." Then he gunned the motor and took off. A picture of the boat as I was talking to them is attached. The wind is obvious.

His action left us in the lurch. We could not risk going on to 209 and finding they had taken it. We were becoming exhausted, it would require running another major rapid, and the next camp was another mile below 209, exposed to the wind, and on the wrong side of the river to allow us our planned hike. We had no choice but to take the next camp we came to at mile 207, which of course they easily could have taken, too. We have no idea where they actually camped. They certainly did not do a layover, because we did not see them the next day. But consequently, we missed our layover and long-planned hike, and we had to re-adjust the rest of our trip and campsites. This unfortunate exchange with a National Park concessionaire cast a pall over our group.

Hon. Lamar Smith  
May 13, 2012  
Page 2 of 3

The WRE boatman's actions were downright rude. We had not seen anybody all day, so 209 was open, and of course we could not get there first as our oar boats were fighting a strong headwind vs. his motorized tour boat. He could have easily motored to a different site, and gotten there in a reasonable time. The vast majority of commercial trips we encounter are courteous and helpful. This was an exception. Non-commercial and non-motorized trips do not like the intrusion of the concessionaire helicopters and their motor boats, and this type of behavior adds to that distasteful intrusion. Just because they have a motor does not mean those trips can do whatever they want and push do-it-yourself river runners around. And I might add that getting a non-commercial permit on the Grand Canyon is very difficult. During the prime season, there are up to four commercial launches per day, with up to 32 people per trip. In contrast, there are an average of 1.5 non-commercial launches per day, with up to 16 people on some and only 8 people on the others.

I ask that WRE's actions be taken into account when reviewing any renewal of their concessionaire contract in the future. I would like to receive confirmation that my letter of complaint is on permanent record with the concessions office at Grand Canyon National Park against this concessionaire. I would like to know what action the NPS is going to take to make sure this does not happen again.

Sincerely,

(b) 6

cc: Mr. David Uberuaga, Superintendent ✓  
Grand Canyon National Park  
P.O. Box 129  
Grand Canyon, AZ 86023

Attachment

Hon. Lamar Smith  
May 13, 2012  
Page 3 of 3



GRCA 8211 PAGES



# 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:

C38 (GRCA 8214)

JUN 05 2012

**COPY**

(b) 6

Austin, Texas 78730

Dear Mr. (b) 6 :

Thank you for your letter dated May 13, 2012, in which you described your privately permitted river trip's encounter with a commercial river trip operated by Western River Expeditions, Inc. (Western). In this incident, a boatman from Western could not guarantee they would leave Granite Camp open for your party.

We understand that such a refusal was extremely frustrating and that it negatively impacted your intended itinerary. The regulations governing both commercial and private river trips in Grand Canyon National Park emphasize that all camps along the river are available on a first-come, first-serve basis. While groups often coordinate their camp selections, no group is guaranteed any camp on any particular night, and groups frequently fail to obtain multiple "desired camps" in the course of a trip. After looking into this situation, we have learned that there was a third group, traveling ahead of you, already occupying Granite Camp on that day, preventing both your group and Western from staying there.

Having said that, Grand Canyon's commercial river outfitters, including Western, have a long history of providing assistance and working well with other boaters on the river. We have forwarded your concerns to Western's management, they have discussed the incident at length with the trip leader, and they will be responding to you separately. Western is exploring how its guides might explain their camp decisions more clearly in the future, to improve how such interactions play out.

As we do with all letters regarding concession activities, we will maintain your letter in Western's permanent operations file, and review it as part of our development of their Annual Overall Rating. The Annual Overall Rating informs decisions made regarding renewal of a concessions contract.

TAKE PRIDE<sup>®</sup>  
IN AMERICA 

GRCA 8211 PAGE 05 16

CY12-74

Again, thank you for providing your input to us. If you have any questions, please contact Grand Canyon National Park Concessions Specialist Laura Shearin at (928) 638-7351.

Sincerely,



David V. Uberuaga  
Superintendent

cc: Hon. Lamar Smith, Texas Congressional District 21, 2409 Rayburn House Office  
Building, Washington, DC 20515  
(b) 6 [redacted], Western River Expeditions, Inc., 7258 Racquet Club Drive, Salt Lake City,  
Utah 84121

C 38 (GRCA 8214)

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*DM 2/5*

(b) 6

Austin, TX 78730

June 12, 2012

**received**  
JUN 10 2012

Brian I. Merrill  
Trent Keller  
Western River Expeditions  
7528 Racquet Club Drive  
Salt Lake City, UT 84121

*— Lewtz  
R. Martin  
L. Shearin  
M. McBinnis*

Ref: Your letter of May 28, 2012 in response to my letter of May 13, 2012 re actions by Western River Expeditions motorized river trip on Grand Canyon

Dear Mr. Merrill and Mr. Keller:

While normally a polite response is sufficient to resolve a difference of opinion, your letter of May 28 contained some inaccuracies that need to be corrected as they are at least wrong, and at most, intentionally misleading.

In your letter you say Western uses group size to make decisions regarding who gets what campsite. Since commercial trip sizes can be up to 32 or 24 people depending on season, while self-guided non-commercial trips can only be up to 16 or 8 people, it is rare for any commercial trip to be smaller than a self-guided trip. Your premise is, essentially, that commercial trips have first choice of any camp, which I doubt the National Park Service (NPS) would agree is their intent. Regardless, citing NPS-mandated group sizes as a reason for using the motor advantage is not what good cooperation on the river is made of. I am sure you are aware there is an equally large camp in that area (Big Bar) that you could have taken. Furthermore, you had only one boat to our five, and both of our groups were medium-sized.

Everyone is aware that campsites are first-come, first served. We had nothing set in stone and are always flexible. However, a non-layover trip should have given their flexibility to the trip that expressed a layover plan—we would have if the situation were reversed, and have done so.

If we had arrived at Granite Park to find another group of self-guided river runners camped there, we would have approached them politely about sharing the campsite, something that is not uncommonly done with self-guided groups. In fact, on this trip we offered another group to share Bass Camp with us, although we were there first, and we both had a great time doing that, one of the highlights of our trip.



Brian I. Merrill  
Trent Keller  
June 12, 2012  
Page 2 of 3

We were polite to your boatman about asking him to please leave Granite Park for our layover camp. The response we got from him was not polite. At that time of day, we were almost at our goal, and he effectively took it, plain and simple, just because he had a motor and he could get there "firstus with the mostus." A layover camp is more than just doing a hike. It is a day off from packing and unpacking the boats, and allows everyone to relax and do other things. Moving two miles the next day and re-camping would not have achieved that. And as it turned out, the winds were so high the next morning that we were forced to stay at our campsite until afternoon, at which point we packed up. It was far too late to consider any hike at Granite Park, but if we had been there, the wind would not have been a factor and we could have done everything.

You refer to a 50-50 split of commercial and non-commercial use. This is incorrect. In the 2006 Colorado River Management Plan Record of Decision, the NPS estimates there are about 14,385 commercial passengers (not including crew) on 476 river trips in the high-demand summer months. In the same time period, only 2,270 river runners participate on 185 self-guided river trips. In the spring and fall, 3,221 commercial passengers participate on 122 river trips and 2,926 people participate on 199 self-guided river trips. In the dead of winter, there are no concessions river trips and the NPS allows 1,855 river runners to travel on 120 self-guided river trips. On a passenger basis, this is equivalent to an 86%-14% split in the high-demand season and a 71%-29% split overall. Anyone who calls that 50-50 is attempting to pull the wool over the eyes of a member of Congress. Self-guided parties would of course welcome a true 50-50 split if that is what you are proposing.

You mention the Colorado River Management Plan. It was not the wonderful compromise you imply. It was litigated to address the imbalance of use patterns annually, imbalance in group sizes, and the concessions' use of motors on the river. Though the litigation was not successful, the contentious issues that the litigation raised are still in play. You say it has "proven to work very well for the vast majority of river users." That vast majority would be the clients of companies like yours on concessions trips in the peak season, at the expense of everyone else.

I would like to clarify the reason I wrote to my congressman and the National Park Service rather than your firm. Commercial and self-guided trips are governed by two separate sets of regulations, as you are well aware. The Park Service promulgates those regulations under authority granted by Congress. I believe it is important that conflicts such as this be brought to the attention of the parties that are ultimately responsible for management of the river.

In this specific case, your response clearly illustrates a basic difference in philosophy between self-guided and commercial trips that is virtually guaranteed to result in continued conflicts.

Brian I. Merrill  
Trent Keller  
June 12, 2012.  
Page 3 of 3

Your response reinforces the idea that your use of motors effectively entitles you to claim whatever campsite suits your preference. It is usually possible for oar-powered trips to communicate with other trips travelling the same speed as they often leapfrog each other, but it is impossible to plan to reach a campsite with the uncertainty that a motor-powered trip may swoop past at any time. It is akin to having a parking spot stolen by another driver who rushes in while the first driver politely waits.

I received Mr. David Uberuaga's (NPS) letter of June 5. I reiterate to Mr. Uberuaga that I would like to know what action the NPS is going to take to make sure this does not happen again. Does the might of a motor make right, which is essentially what Western is saying? If motors are to continue to be allowed in the canyon, some provision needs to be made in the regulations to alleviate these conflicts. A suggestion would be to require motor operators to defer to oar-powered groups after a given time, say 3:00 PM, since motor-powered trips have greater flexibility to locate alternative campsites in the event a camp is taken. And finally, when is the NPS going to re-evaluate the clearly unequal split between commercial and self-guided trips in the peak summer season?

Sincerely,

(b) 6

cc: Mr. David Uberuaga, Superintendent, ✓  
Grand Canyon National Park  
P.O. Box 129  
Grand Canyon, AZ 86023

Congressman Lamar Smith  
Texas Congressional District 21  
2409 Rayburn House Office Building  
Washington, DC 20515

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Portman, Dean < dean\_portman@nps.gov >

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## Fwd: Changes to trip length

1 message

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Sullivan, Steve < steve\_sullivan@nps.gov >  
To: Dean Portman < dean\_portman@nps.gov >

Tue, Mar 11, 2014 at 4:48 PM

Hi Dean,

This one is pertinent to the trip length issue in the Spring.

Thanks,

Steve Sullivan

Permits Program Manager  
Grand Canyon  
928 638 7415

----- Forwarded message -----  
From: Sullivan, Steve < steve\_sullivan@nps.gov >  
Date: Mon, Dec 16, 2013 at 1:37 PM  
Subject: Re: Changes to trip length  
To: (b) 6@naturesown.com

Thanks (b) 6 I appreciate the input and reasons.

Sincerely,  
Steve Sullivan

Steve Sullivan

Permits Program Manager  
Grand Canyon  
928 638 7415

On Mon, Dec 16, 2013 at 1:32 PM, (b) 6@naturesown.com > wrote:

Hi Steve,

Very informative graphics. Excellent presentation of a lot of information.

Please , self guided trip lengths April 15 to April 30 should not be changed from the current 21 day because:

GRUPA SZUKA PRAWA W

-High upstream wind season. Erratic gusts make set up and entry much more difficult and dangerous in the big rapids. In the flats, you frequently get blown into shore.

-More inexperienced boatmen on the river with the new lottery. More time (not less) needed for thorough scouting above the rapids. Safety is the issue more than anything.

-If you're scouting and rowing high winds, new participants may never experience the side hike wonders and will always be in a rush.

-This will only encourage the use of more and more motorized self guided trips which will lead to more congestion at sites, more crowding, and more conflicts,

Not less.

-21 days in September should also be retained for all of the reasons stated above.

(b) 6

CRUC 8211 PPLB 12



Portman, Dean < dean\_portman@nps.gov >

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## Fwd: Questions

2 messages

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Sullivan, Steve < steve\_sullivan@nps.gov >  
To: Dean Portman < dean\_portman@nps.gov >

Tue, Mar 11, 2014 at 4:55 PM

Hi Dean,

Here is a chain of emails with (b) 6, all from after Tom's letter. Do they count in the FOIA?

Thanks,

Steve Sullivan

Permits Program Manager  
Grand Canyon  
928 638 7415

----- Forwarded message -----  
From: Sullivan, Steve < steve\_sullivan@nps.gov >  
Date: Mon, Dec 16, 2013 at 2:42 PM  
Subject: Re: Questions  
To: (b) 6 @att.net >  
Cc: (b) 6 sbcglobal.net >

Hi (b) 6

You are welcome. The PATL utilization data query is an easy one to run, but I do not have access to my web person today to get me that access. With leave and all, I think that will have to wait until January. I also understand your wishes with user-days -- and I do remember that this was important to so many of our noncommercial users. Within this CRMP, though, it is just not a driving force. When it comes to seed planting, it is as fine a topic as any :)

Thanks,

Steve Sullivan

Permits Program Manager  
Grand Canyon  
928 638 7415

On Mon, Dec 16, 2013 at 2:00 PM, (b) 6 (b) 6 @att.net > wrote:  
Hi Steve,

Excellent -- thanks a lot. Nothing on the PATL utilization data?

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I understand these four items are still in flux. I personally would like to see the PATL change sooner rather than later. That's not a (b) (6) position, but I suspect 2014 implementation would be viewed favorably by the rest of the group, since we support it in undated fashion.

I understand that user days are not the prime metric -- (b) (6) regularly reminds me of that. But there are some collateral aspects to consider from my point of view.

First, they are a sort of derivative, parallel measure of the Canyon's "carrying capacity" so to speak. You (well, the CRMP) are/is willing to accept the proposition that they might even exceed the 115k level. That suggests to me there's no structural reason why mechanisms couldn't be put in place to get as close to that number as possible. It's an important, non-nuanced element in the way the boating public perceives how the CRMP is working for them. To be clear, (b) (6) and some others don't have this problem (they think it's over-allocated already). But for me, optimizing within permissible boundaries is not just within the spirit of the CRMP, but is an important goal for our members.

Second, recall that one of the big selling points we used with the boating community -- in addition to the doubling of launches -- was approximate parity in user days with the commercial folks. They have mechanisms available to maximize use of their allocation. That makes me keep going back to try to find a practical (from your point of view) way for the same thing to happen in our arena. The idea of using a rolling three year average of lapsed days to recalibrate trip length really appeals to me for that reason. Yes, you'd have to find some low points in the TOAT graph to do it, but the data is there. And if nothing else, you could start with going to 30 days in the winter and win a lot of good will. And maybe even get a few more applicants for those hard-to-sell launches.

This all is still seed planting, I guess. But part of where I'm at, is thinking ahead to how people will be processing the early years of the CRMP, and what they will be urging as far as changes. In the beginning, it was quite reasonable to hold back and see what patterns developed. But the time is coming when we (b) (6) (b) (6) will be doing our own analysis, and seeing if there are ways adaptive management can be directly applied. Some of the pressure to do that will come from (b) (6) (b) (6) in ways we can now anticipate -- others may not be.

And I've got one final random thought. The Park committed to gathering a huge amount of data in support of the Plan. It would surprise me if there are some people out there who will go through the document, compile a list of all those requirements, and ask for them. If the data's there, great. If they're not, well...

I've gone on too long, but I have to emphasize how much we appreciate you being willing to share your thinking on this, as well as responding to our inquiries in the detail you do.

(b) (6)

----- Original Message -----

From: Sullivan, Steve

To: (b) (6)

Cc: (b) (6)

Sent: Monday, December 16, 2013 1:31 PM

Subject: Re: Questions

Hi (b) (6)

Thanks for the quick response. In answer to your first question, no, I do not have a rough timeline. When I give my annual presentation to (b) (6) and others, eventually posting it on the internet for all to see, I am trying to give advance notice on some of the things I might move forward on (providing I find the time and you don't help change my mind). That is just me being as transparent as I can be, and I realize that sometimes you and/or others might not like what I say and suggest different or no changes. I want to hear your and other's ideas because that helps me and the park make even better decisions. I think these ideas are honestly great ideas for improving our system, and everyone I speak to about them seems to agree once they chat with me. So, I had been thinking about pushing the PATL change, maybe making it happen as soon as before this February's lottery. But, I am somewhat inclined to go slowly when I hear people hashing out an issue, and I'd like to hear more

general consensus before moving forward. If it is only a few folks wanting to rehash old stuff, that is one thing, but if it is more, than that is another thing. As you well know, change takes work, and I am happy to do that work when there is consensus, but I certainly have plenty of work already.

Regarding userdays, remember that for noncommercial use they drove nothing and were really just projections based on probable (what we thought likely at that time) use. For instance, it is possible in a year to have most trips launch with full number of people for maximum lengths, and if this happened, noncommercial userdays would well exceed 115,500, and that would be fine. The important issue and the issue at hand now is the number of trips in the canyon at one time -- the CRMP TAOT target of 60 or less carries real weight at least for the length of this plan (and it is conceivable that reductions in beach sizes over the years may put pressure on lowering this TAOT number for future plans). I suggest taking a good look at that TAOT chart -- it really is quite tight for the prime seasons. While total noncommercial TAOTs are not limited, we already limit commercial TAOTs by day, and this forces the companies each year to shorten quite a few trips beyond what they would like to do. FYI, this was implemented for the commercial sector back in 2006 with the implementation of the CRMP.

As always, it was great to hear from you.

Sincerely,

Steve Sullivan

Permits Program Manager  
Grand Canyon  
928 638 7415

On Mon, Dec 16, 2013 at 10:42 AM, (b).6@att.net wrote:

Hi Steve,

Thanks for that useful and complete response. I'm going to forward it to (b).6 but I have two questions.

1. Do you have some rough timeline for when final decisions might be made on these items?
2. The real question on PATLs was do you have data, by year, for the number of trips that actually launch with the PATL, as opposed to the original TL? That might give -- when compared with the number who don't list a PATL and cancel -- another angle on the issue.

In response to your embedded question, I do favor fiddling with trip lengths rather than number of launches, although I personally think there is an argument for reducing the number of winter launches and adding back in a corresponding number of shoulder season launches in their place. (Planting a seed there.) I know (b).6 supports what you've described. But the discussion on the internet raised an interesting additional question that I've been sort of blind to. Have you considered any other kind of adjustments the commercial sector could make that would alleviate the situation?

And as a final (b).6 question, I'd sort of like to know if there is some immutability to the trip lengths now in place. What if (for instance) you were able to discern a use trend that suggested (using some kind of a rolling average, let's say) that every year 7.5 percent of the optimal user days were lapsing, due to cancellations, no-book dates in the winter, and under-filling of trips. And now I'm really spit-balling it, but suppose that number allowed you to increase the length of every trip by one day. Or every trip in some portions of the year? Or even several days in the winter, when there does seem to be an interest in restoring the old length? Do you have the latitude to use adaptive management to do something like that, or are those numbers it too deeply imprinted in the CRMP?

As always, we appreciate your help and responsiveness. Stay well and stay warm.

GRCA 8211 PAGE 15

(b) 6

----- Original Message -----

From: Sullivan, Steve

To: (b) 6

Sent: Monday, December 16, 2013 10:26 AM

Subject: Re: Questions

Hi (b) 6,

Thanks for the email and good to hear from you. The potential change with trip lengths (potential because it has not cleared our review group and has not been presented to the Superintendent for his review) has us exchanging the maximum trip lengths for the last half of April with the first half of September. Currently all of the shoulder season (March, April, September, and October) are allowed 21 days except for Sept 1-13 where we allow 18 days. This potential change would move the exception 18 day trip to the last half of April instead of the first half of September. (I do see I typed this wrong on one page of the presentation -- I'll have to have that fixed at some point.)

With me just hearing the bits and pieces shared with me by (b) 6 and now you, it sounds to me like the "discussion" is harboring back to the age old question we faced developing the CRMP regarding maximizing number of trips versus maximizing trip lengths -- it sounds like some still wish we had chosen more on the side of longer trips rather than more trips. At that time we also heard from others who wanted even more trips and were willing to go even shorter. Clearly there is a trade-off, and we settled where we did trying our best to take into consideration everyone's input. The same applies here because we could effectively accomplish the same goal of trying to keep TAOT at 60 or below in early May by eliminating a few noncommercial trips in the last half of April. I figure trading maximum trip lengths would be the better option -- what do you think? Another viable option could be to let the crowding and resulting frustration continue for that time period. Does that achieve the public's overall desired conditions for the experience?

The CRMP EIS considered TAOTs as a key carrying capacity standard because it translated directly to a sense of crowding and how many trips were on the river competing for our finite number of beach campsites and how close to each other they would be likely to have to camp. Page 32 of the FEIS explains this briefly and talks about how maximum TAOTs would be reduced from 70 to 60. If you look at my presentation data, you can see we are hitting 64 in early May -- above our projected 60. This means on those days there are 64 trips on the water looking for / competing for the limited number of campsites. For some areas of the canyon, this can be a big deal. While I have not kept a pile of complaints to share, I have seen over the years complaints both from noncommercial trip leaders and from commercial guides attributable to the early May time period regarding crowding on the river and frustration regarding the difficulty of finding / competing for campsites. Again, the question is, does this meet the CRMP's desired conditions, and if not, what should we do about it?

You also mentioned the PATL issue and asking for data on it as well. My office is constantly dealing with trip leaders who did not list PATLs and now are experiencing something that is preventing them from going as planned. This is not a pleasant situation as their options are extremely limited -- either go or cancel. The potential change would strongly encourage listing of PATLs and at the same time stop giving so much advantage to groups that put in two applications (one under each member's name) instead of one application (with the other being listed as a PATL).

I hope this helps. Have a great Christmas!

Steve Sullivan

Permits Program Manager

GRCA 8211 PAGE 16



Grand Canyon  
928 638 7415

On Fri, Dec 13, 2013 at 3:01 PM, (b) 6 <[REDACTED]>@att.net> wrote:  
Hi Steve,

As you may know, we're involved in a scuffle on several internet fronts over the four changes in your Powerpoint presentation, and some other issues. To most effectively deal with some of the static that's being thrown up, we need some help, if you can provide it.

First, something jumped out at me today that I should have seen earlier, or else I'm truly confused.

\* Your presentation says the change is from 18 days to 21 for the second half of September.

\* The Non-Commercial regulations (dated 1/9/13) say trip length already is 21 for that period.

I guess I somehow got into thinking it was 18 days all the way to the end of September, and that the proposed change would take it to 21. If it's already 21, is it going to 24? Or is the change really in the first half of September?

Also, and this is secondary, but it still would be helpful to know anything you could easily uncover by way of data on:

\* Multiple year TOAT and PATL data, to neutralize the thought that this is a short-term issue (links to those data would be fine)

\* General comments on any input you may have had from commercial folks on the TOAT situation

\* Any complaints you've received about the Spring trip length/trip interaction situation -- private or commercial

\* Some idea of the degree of importance the TOAT thing is with regard to compliance with the CRMP/ROD

Thanks for any help you can provide, and as always thanks for the good job you and your staff do.

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Portman, Dean < dean\_portman@nps.gov >  
To: "Sullivan, Steve" < steve\_sullivan@nps.gov >

Tue, Mar 11, 2014 at 4:58 PM

Thanks for the three emails. Good stuff. They may count/be valuable for the FOIA reply.

Dean

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