

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

January 24, 2010

Dear Superintendent Martin,

Thank you for your letter of January 4, 2010, in regards to possible adaptive management changes that could be implemented during this present Colorado River Management Plan (CRMP) cycle.

#### Driftwood Collection

We are pleased to see that driftwood fires will still be allowed for warming purposes on winter river trips. As someone who has been fortunate enough to raft in the Grand Canyon in the winter months, I can't tell you how much a warming fire means to river runners in the winter.

#### Fire Pan Blankets

The requirement of a fire blanket is also a good idea. We note from communications with a fire blanket manufacturer that industry standard fire pan dimensions range from 15 to 18 inches in width, with a length of 24 inches. The standard roll width for high temperature coated material is 60 inches. Hemmed, this decreases to roughly 59 inches. Hence, based on available material and in order to keep costs down and compliance up, we would encourage the Fire Pan Blanket size requirement to be 20 inches minimum beyond the edge of the fire pan footprint, and not 24 inches.

Allowing for a 20 inch extension allows river runners that already have a standard fire blanket that is 60 inches x 72 inches to be in compliance, and allows blanket manufacturers the ability to work with industry standard stock roll widths. We can find no science to back up the 24 inch length extension, and suggest starting with a 20 inch extension minimum each side. Should the implementation of a 20 inch extension Blanket combined with the decrease in the driftwood fire burning season result in continued ash spoiling of beaches, the size requirements could be adjusted up accordingly.

#### Unused Winter Launch Dates

While the fire blanket and driftwood burning changes are appropriate, we were very surprised to note the agencies lack of flexibility in modifying winter permit requirements. Having just completed a winter trip, our on-the-river contacts were with two solo trips, one a 25 and one a 16 day trip, and with one 25 day trip of 12 people and another 16 day trip of 12 people. Our trip was a 25 day trip with 12 persons to Phantom and 13 people to Diamond. While clearly not a large representative sample, our anecdotal evidence, combined with the park's actual use data for the last three years clearly shows that winter use is clearly well below user day limits and that threshold requirements to obtain a winter permit are too steep a climb. Indeed, your letter of January 4, 2010, clearly states "A number of winter trips have gone unclaimed despite follow up lotteries over the past few years."

While the private concessions can decrease their trip prices to make sure trips fill in the shoulder seasons, the only way the do it yourself general river running public can have an easier time winning an unclaimed river permit in the off season is if the agency decreases the permit requirements or makes the permits more attractive in the off season. As we mentioned in previous correspondence, eliminating the one-trip-a-year requirement and or returning trip lengths to their previous length (30 days in the winter) are ways the park can decrease the permit burden on the public river runner in

the winter. There may be other incentives, such as decreasing the permit and per person fees for off season trips, as an example.

We see no justification in your letter of January 4, 2010 for this continued lack of flexibility to address an NPS identified shortfall within a management plan that was supposed to adapt to just these types of situations.

That said, we understand there may be good reasons for the Park Service to take the action of not decreasing the winter permit burden on the general river running public that we may not have considered.

With that in mind, we would like to, under the Freedom of Information Act, receive copies of any and all correspondence and meeting notes between Grand Canyon National Park and all the “variety of stakeholders and parties interested in the implementation of the Colorado River Management Plan” cited in your January 4, 2010 letter, from June 1, 2009 forward.

With this information we hope to better understand the scope of issues other stakeholders have with lessening the winter permit restrictions on unused winter launch dates. We would hope that with this information we may be better able to offer your management team solutions that allow river runners to take advantage of the unused winter launch dates.

Thank you again for your time in addressing these ongoing components of Colorado River management in Grand Canyon National Park.

Sincerely,