

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

October 6, 2010

Dear Superintendent Martin,

We now have five winters worth of data to gauge how the 2006 Colorado River Management Plan is working, and could possibly be adapted to better serve the resource and river runners seeking a Grand Canyon river running experience.

In 2009 we were very optimistic when your office initiated the first steps toward taking adaptive management corrective action to assist self guided river runners in claiming unused winter permits. We regret that those changes were not implemented at that time.

In reviewing the 2009 statistics posted here:

[http://www.nps.gov/grca/planyourvisit/upload/Calendar\\_Year\\_2009\\_River\\_Statistics.pdf](http://www.nps.gov/grca/planyourvisit/upload/Calendar_Year_2009_River_Statistics.pdf)

we note that in the winter months of 2009, twenty five winter permits went unclaimed, the same as in 2008, and 38 went unclaimed in 2007. The corrective actions you were considering may have assisted self guided river runners in obtaining a permit to experience the Colorado River by raft and thus assured more launches would be claimed.

Under the Freedom of Information Act, we were able to review comments from three groups representing commercial river runners, and a fourth group who is in a cooperative Memorandum of Understanding with two of the three commercial groups. In reviewing those comments, we could not find any substantive justification for not implementing adaptive management changes to allow these unused permits to be claimed.

Another winter season is approaching. We encourage you once again to consider decreasing the present overly restrictive hurdles river runners must clear to obtain a winter rafting permit. Below are mechanisms we have identified to increase river runners chances to claim one of these unused winter permits:

- Remove the One-Trip-per-Year restriction during winter months
- Remove the weighted point restrictions during the winter months
- Return to the pree-2006 winter trip length of 30 days to Diamond Creek

We appreciate your willingness to improve the self guided river runners' experience when exploring Grand Canyon. We look forward to working with you in looking at possible ways to modify the regulations impacting self guided river runners applying for winter permits as we have suggested. It is our hope these changes will be implemented this fall.

Sincerely,

Tom Martin, Co-Director  
River Runners for Wilderness  
Arizona Field Office, PO Box 30821, Flagstaff, AZ 86003