

Superintendent David Uberuaga
Grand Canyon National Park
PO Box 129, Grand Canyon, Arizona 86023

September 6, 2011

Dear Superintendent Uberuaga,

On behalf of all recreational river runners, please accept a warm “Welcome” to Grand Canyon National Park.

Since 2002, River Runners for Wilderness (RRFW) has represented a broad spectrum of river runners, wilderness lovers and American citizens who care about the wilderness resource in Grand Canyon National Park. Our members, now approaching two thousand, continue to have a deep concern for the future of the wilderness values of the Colorado River and Backcountry in the Grand Canyon.

Jo Johnson and I serve as volunteer Co-Directors of RRFW. Jo is active in Republicans for Environmental Protection (REP America) and I also volunteer with the Sierra Club, serving both on the local and state chapter executive committees. We typically meet with Grand Canyon staff throughout the year, both formally and informally, to discuss issues impacting wilderness preservation at Grand Canyon.

We would like to take this opportunity to bring the following issues to your attention:

- 1) This February, I had the opportunity to participate in a river trip from Lee’s Ferry to Pearce Ferry through the entire length of the Park. We found it curious that at the Lee’s Ferry put-in ramp, a movable sign indicated that half the ramp was reserved for river concessions services. These services do not operate between the months of November and April. I asked the Lee’s Ferry Ranger about the sign, and was informed that the sign was in place to “teach river runners that they cannot expect to use the entire ramp during the busy summer season.”



We found that explanation most unusual, given that recreational river runners may only participate in one river trip a year. We ask that this sign be removed at the end of the concessions season, and returned when the concessions resume operations April 1.

- 2) We have noted an increase in the number of river trips exchanging at the mouth of Pipe Creek. The riverside at this location is steep banked and strewn with boulders. Given that this location is within the non-wilderness cross canyon corridor along the Bright Angel Trail, we respectfully suggest consideration be given to construction of a trail along the river bank with rock steps constructed down to the water's edge, as has been done at the heavily used Lower Cremation Camp, just two miles upriver.



- 3) We note that recent trends in wildland ecology have begun to incorporate the concept of re-wilding, recognizing the need for ecological inclusion of sustainable populations of large herbivores in the management of wildlands. This ecological niche on the North Rim has been unfilled for the last 13,000 years. In the last decade or more, this niche is now being filled by buffalo from the House Rock Valley population. We encourage the NPS to recognize and adopt the buffalo as a close surrogate to the now extinct large mammal Pleistocene herbivores.

Embracing a buffalo population control strategy allows the NPS the “teachable moment” to educate the tourists to the North Rim about the role of Pleistocene megafauna and their role in ecosystem management. The NPS has a unique opportunity to serve as the keystone species, previously filled by the sabre toothed cat, the dire wolf, and North American lion. The buffalo

population should be held in check through resource management hunting of the old and infirm buffalo, allowing food for condors, wolves, and other scavengers. Management of the population should be encouraged, but removal of buffalo from the Park on the North Rim should not be attempted.

- 4) We now have six 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.

We continue to encourage your office to use adaptive management to assist recreational river runners in claiming unused winter river trip permits. For the last five years we have, and still propose, the elimination of the one-trip-per-year rule as it relates to recreational river runners during the winter commercial-free season.

- 5) For the last two years, RRFW has expressed concern regarding the dominance of river concessions participation in the development of the Historic Boat Museum project at Grand Canyon National Park. Our concern included the fact that the river concessionaires had majority control of the Grand Canyon River Heritage Coalition, and that celebrating the commercialization of the river dominates the Heritage Coalition position.

In a letter from Superintendent Martin in December of 2009, D6215 (GRCA 8211), we were informed that GRCA would "...notify your group of relevant planning meetings so that you may participate along with the GCROA and other interested groups." To this day, we have not been notified of any planning meeting surrounding this project. We still remain as interested as ever in this project and look forward to participating in same. Here is a photo from a three boat replica trip in Grand Canyon Tom participated in this February, without any assistance from the Grand Canyon River Heritage Coalition.



- 6) We are concerned that concessions motorized watercraft are being driven at high rates of speed into large rapids for a “thrill ride.” Our concern is based on a witnessed event in 2010 at Hermit Rapid. Two concessions motor boats went through the same rapid, one at a faster rate of speed. The faster boat ended up with one paying passenger being forcefully ejected from the craft while another sustained a fractured arm resulting in a helicopter evacuation.



Slower watercraft, injury free



Faster watercraft, injuries sustained

Operating watercraft large enough to neuter the rapids in the Canyon requires that the craft be operated at a higher rate of speed to obtain a “big ride.” Such a big ride in a large motorized watercraft will often result in injury, while a slower transit through the rapid, or bypassing the largest waves altogether, would avoid this situation completely. We encourage GRCA to take a hard look at its evacuation statistics. Should there appear to be a trend in this type of incident at this rapid, we encourage GRCA to notify concessions operators to cease this type of thrill ride activity.

We appreciate Grand Canyon National Park’s willingness to improve the recreational 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. It is our hope these changes will be implemented this fall. We also look forward to working with Park staff in the development in a River Heritage Museum, and addressing safety considerations pertaining to river travel.

Sincerely,

Tom Martin, Co-Director
River Runners for Wilderness
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