

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

September 24, 2009

Dear Superintendent Martin,

Thank you for your letter of July 28, 2009, in regards to possible adaptive management changes that could be implemented during this present Colorado River Management Plan cycle.

Thank you for your explanation of how the lottery fees are administered. On that issue, we will have to disagree, as we still believe the fee structure is an unnecessarily large burden to self guided river runners.

As to the one trip a year rule, it sounds as though there may be some grounds for agreement that this rule could be modified. We certainly feel that this rule should be removed completely throughout the year. The benefits to self guided river runners, commercial passengers and concessions contract operators during these difficult economic times is obvious.

As a step in that direction, one option would be to immediately rescind this rule in the winter months of November through the end of February for self guided river runner permit holders and passengers alike. As there are no concessions operations during this time of year, with no commercial demand, the rule imposed in the winter seems overly burdensome.

As to modifications to how the lottery is operated, we will still recommend that the lottery be modified so that losers gain points. The reason we support this position is that being a permit holder is the key position in deciding what type of trip will occur. This is the ultimate position to be in as a self guided river runner. It's "your" trip. Going on someone else's trip re-sets your lottery chances of being a permit holder to one, even though you may have tried and failed to be a permit holder for the last three years in every lottery run.

With regards to trip lengths, River Runners for Wilderness encouraged the NPS not to shorten trip lengths anytime of the year throughout the last CRMP process. We note that the NPS response to our July 15 2009 letter requesting lengthening trips only focused on the summer months. We note there was no response to our request to return trip lengths to their pre-2006 length in the off season. Surely trip lengths could immediately be restored in the winter and spring to their pre 2006 lengths without adversely impacting the number of trips at one time limits. In the summer when not all concessions trips are full or even launching, restoring 18 day trip lengths should be considered.

We too appreciate your willingness to improve the self guided river runners experience when exploring Grand Canyon, and we look forward to seeing modifications to the regulations impacting self guided river runners as we are suggesting above being implemented as early as this fall.

Sincerely,

Tom Martin, Co-Director
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