

River Runners For Wilderness

Colorado River Management Plan Talking Points November 2004

Please comment on the Draft Environmental Impact Statement (DEIS) for the Colorado River Management Plan (CRMP) in Grand Canyon National Park. You can comment until January 7, 2005. Read the plan using (free) Adobe Reader 6 on the Park's website at www.nps.gov/grca/crmp, or through the River Runners for Wilderness website's CRMP page at www.rrfw.org. You can submit multiple comments by fax, mail, email, and directly to Park staff at seven meetings scheduled in Phoenix, Denver, Flagstaff, San Francisco, Las Vegas, the Washington DC area and Salt Lake City.

RRFW quickly gave the preferred Alternative H an "F" for continuing the decades-long discrimination against do-it-yourself public boaters seeking a wilderness river trip in favor of motorized tour concessionaires. Chief among its problems is that Alternative H fails to offer even a passing reference to beginning a phase out of commercial helicopter exchanges and concessions operators' motor trips. This step is critical for compliance with the Park's requirement to manage the river for wilderness character.

River Runners for Wilderness is primarily concerned with 4 aspects of the plan:

- 1) The **preservation of wilderness character** for the Colorado River in Grand Canyon National Park
- 2) The **distribution of limited access** to the Colorado River in the Park
- 3) The need for, and **appropriateness of, river concessions services**
- 4) The need for a **broad range of recreational services**

Your participation is VITAL. Numbers do count and a high volume of comments in favor of adopting fair wilderness management methods will have an impact. The Park prefers *personalized* comments addressing their **specific statements** in the Plan. Indications are that general and vague remarks will be disregarded or "marginalized".

Please use the talking points below and weigh in during the remainder of the 90 day period. Come to one of the Park's open houses, ask questions and challenge the answers you get. Sign up your friends, family and fellow boaters as RRFW members—it's free—to be part of the largest non-commercial boater constituency specifically dedicated to wilderness river running.

What You Might Write In Your Comments

"I support a modified Alternative C with the following changes:

- **Preserve wilderness character** as a resource. Inexplicably, none of the alternatives identifies this crucial element as a resource in Grand Canyon, even though NPS policy directs the Park to do so.
- **Safeguard wilderness preservation through the elimination of motors.** There must be a motor phase out plan that provides a smooth transition to a motor free river within 10 years.
- A modified Alternative C **should not allocate or discriminate between user groups. The Park must implement a common pool permit process.**
- **Equalize the summertime launches between groups and apply the same group size equally to all types of trips.** Alternative C must achieve trips that are more consistent with wilderness character management of the Colorado River.
- The Park must ensure **all river travelers compete together, equally**, in the same way for trip launches.
- The Park must maintain present noncommercial trip lengths in all seasons.

"There are some good components of Alternative H that I like. They are:

- The preferred Alternative H is a step in the right direction because all river runners, not just noncommercial boaters, must sign up with the NPS to **measure the public's interest and demand** for river running in Grand Canyon.

- The preferred Alternative H reduces **commercial oar trips and eliminates commercial motor trips** in September.
- The preferred Alternative H is taking a step in the right direction **by reducing commercial oar trips and eliminating commercial motor trips** in September.
- Alternative H awards noncommercial boaters a much bigger allocation than ever before, although still far below demand, and I support this increase.

“I reject the Park’s preferred Alternative H which continues **motorized tour boats and helicopters in wilderness Grand Canyon because:**

- This alternative still does not count staff. All alternatives must **count concessions crew** as part of the use numbers since all people impact the resource.
- The CRMP assumes greater future demand for concessions services, even though concessions services have not been able to sell their seats for the last three years. The Park must explore **at least one alternative that allows more noncommercial river trip participants than commercial river trip participants.**
- The Park’s preferred alternative is defective in that there is no justification to retain the imbalance in the actual number of river travelers by user group during the summer season. I support a modified Alternative C which **equalizes the summertime launches and group sizes.**
- This alternative should not **allow motorboat support for paddle trips.** The addition of a motorized boat to support an otherwise all human powered trip is not necessary and this practice should be eliminated.
- Alternative H does not address and follow the Park’s minimum tool analysis for a proposed wilderness. This and all the other alternatives must be evaluated for their **compliance to “minimum tool” practices** (maintain and manage the corridor using the least intrusive wilderness methods possible to complete the task).

“In addition, these defects, which apply to all alternatives, are inappropriate and should be rejected:

- The CRMP must include analysis for all alternatives that **justifies concessions services as necessary and appropriate** as a foundation under any of the alternatives, taking into consideration concessions services have been unable to fill their allocation in the last three years.
- Even though comments were solicited on what range of outfitting services should be available to the public, and the topic was further explored in one of the stakeholder meetings, the Park has not examined in this document variations on the current very restrictive offering of outfitted services. This is a gross omission and a missed opportunity. The Park must analyze a **variety of support options**, including providing outfitted guests the opportunity to participate more in their trips, and allowing self-outfitted river runners to hire consultants for their trips.
- None of the CRMP alternatives have fall-back plans to **accommodate continued drought** in the Colorado River Basin. The Park must include an analysis of how the alternatives will accommodate a low flow run-of-the-river condition, precluding the operation of large motorized watercraft.
- In spite of the agency’s requirement to eliminate this non-conforming use, the Park Service’s preferred alternative perpetuates powerboat use for the next 15 to 20 years. There must be a **firm expiration date of** not longer than 10 years, explicitly stated in this plan. This allows flexibility to revisit the plan and solve management problems that appear in the future.

Your Voice Counts!

Please speak out to preserve wilderness character river trips, equitable wilderness access, with a wide array of wilderness suitable necessary and appropriate commercial services. Your opinions are important. If you would like to share your comments with us at River Runners for Wilderness, we’d love to see a hard copy of your comments.

www.rfw.org

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