

Superintendent David Uberuaga
Grand Canyon National Park
P.O. Box 129
Grand Canyon, AZ 86023

June 27, 2011

Dear Superintendent Uberuaga,

Thank you for the opportunity to provide scoping comments on Grand Canyon National Park's proposed Backcountry Management Plan.

As you know, River Runners for Wilderness (RRFW) represents a broad spectrum of river runners, wilderness lovers and American citizens who care about the wilderness resource in Grand Canyon National Park. Our members continue to have a deep concern for the future of the wilderness values of the Colorado River and Backcountry in the Grand Canyon.

Grand Canyon National Park is unique, not only in North America, but on the planet. This unique character is what has inspired America as a society to incorporate the Grand Canyon within the National Park Service control and management. We support such management, setting the highest standards for wilderness protection, provided the NPS follows its own policies and applicable legislation. Grand Canyon National Park has a long history of recognizing the unsurpassed wilderness qualities and characteristics of the park, including the Colorado River, since 1977. We offer our comments within the framework of existing laws and NPS policy that apply as the park undergoes this planning process. These laws and policies are indeed the foundation of our comments.

Scope of the Plan

We note that the emphasis of this BMP process focuses greater attention on the recreational components of the plan, with very little emphasis on what should be the major emphasis of the plan, ecosystem preservation. We strongly encourage the agency to increase the BMP focus on ecological preservation and restoration. This focus should include educational outreach to the general public and recreational community. Outreach should emphasize the critical role the NPS has in protecting and preserving healthy ecosystems first and foremost, and then allowing recreational activities within the framework of healthy ecosystem management.

Commercial Use

The recreational component of the Backcountry Management Plan is grounded in the Wilderness Act:

section 4 (c) *PROHIBITION OF CERTAIN USES*

(c) Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness

area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

And

section 4 (d) (6) Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.

The following issues involving commercial services must be addressed in the BMP:

- The need for proper commercial services must be defined in this plan, and given the overwhelming self-guided demand for permits, commercial services that are defined as necessary will need to be clearly limited in size and scope.
- No type of business concession should exist for Grand Canyon National Park involving overnight use of backcountry areas by permit, including the corridor trails. Such a commercial service is neither necessary nor appropriate.
- If the NPS allows commercial guided backpacking at all, this activity should only occur under the NPS Incidental Business Permit framework.
- Safeguards must be put in place to eliminate the re-sale of backcountry permits.
- Commercial IBP holders must have a verifiable client list prior to application for a permit.
- Commercial IBP holders must have their verifiable client lists verified annually at a minimum of once a quarter prior to application for a permit.

Recreational Backpacking Permitting

- The first day of the month permit distribution process for the next open month must remain neutral, without granting permits in person at the Back Country Office before all others.
- Permits must be distributed to all applicants, be they the general public, IBP, GCFI, etc., in a random process, regardless of intended use, as in a lottery.
- Advanced distribution of backcountry and corridor area permits for any educational programs such as Grand Canyon Field Institute should be discontinued. The GCFI, just like every other guided business, group or individual, should be managed formally within the general lottery schedule.
- Permit distribution must be transitioned to a web based distribution system, while still allowing walk-up window applications.

Zoning in Wilderness

Grand Canyon National Park has used the concept of zoning in permit distribution since 1988. We offer the following comments on area zoning in the BMP:

- The limit to group size, small group at 1 to 6 people and large group at seven to eleven, should not be increased.
- The number of groups allowed within a zone at any one time should not be increased.
- Existing large zones should not be bifurcated into smaller zones for any reason.

Trailhead Access

Grand Canyon National Park has worked diligently since 1988 to completely close a number of primitive roads on both the North and South Rim.

- These areas should remain closed, and not be opened back up to allow for increased visitation by mechanical means, including mountain bikes.
- The Boundary Line Road, between the South Rim and the Pasture Wash Ranger Station, presently open to NPS personnel, should be open to public travel to bypass a toll booth constructed on Havasupai Reservation Land on the only road from the South Rim developed area to Pasture Wash besides the Boundary Line road.
- The Havasupai must allow access to the Great Thumb traditional use lands as required by the 1975 Grand Canyon National Park Enlargement Act. The NPS should collect all appropriate fees for access to this area and deliver said fees directly to the Havasupai Tribal Council.
- The roads that the 1988 BMP designated to remain open, should be maintained on an annual basis. Lack of adequate maintenance of these roads has resulted in significant destruction of roadside vegetation as visitors drive around washed out areas that are not repaired in a timely fashion, if at all.

Mountain Bike Access

The Wilderness Act speaks clearly to mechanized access, including Mountain bikes. This activity should be limited to non-wilderness areas, such as the South Rim to Desert View rim pathway, Boundary Line road, and Hermits Rest road on the South Rim, along with the Point Sublime and Cape Royal roads on the North Rim.

Flotation Assisted Backpacking

Since the 1950's, flotation assisted backpacking (FAB) in Grand Canyon has been a recognized occurrence in the backcountry. Recent technological improvements in the equipment used in this activity, including light weight yet sturdy flotation devices, has resulted in increased demand for this type of recreation. We support this type of muscle powered recreation in Grand Canyon, and suggest the following management considerations for same:

- We would suggest the activity be limited to zones throughout the Canyon, as backcountry use areas have zones. We recommend these zones be implemented around clearly defined trails going from the rim to either side of the river. An example of possible FAB zones would be Lee's Ferry to Eminence Break on the east and Nankoweap Trail on the west, from Eminence Break on the east and Nankoweap Trail on the west to Phantom Ranch, from Phantom Ranch to the North and South Bass Trails, from the North and South Bass Trails to Whitmore Wash on the west and Diamond Creek on the east, and from to Whitmore Wash on the west and Diamond Creek on the east to Pearce Ferry.
- There should be no additional restriction placed on where camping is allowed for FAB activities. River runners presently share camps with backpackers, and FAB activities should not be considered any differently.

Rim to Rim Group Runs on the Corridor Trails

Group Rim-to-Rims runs have greatly increased in the last few years, as has general corridor trail access. Increased Rim-to-Rim day use by large groups has resulted in increased conflicts between backpackers and trail-runners, increased demands being placed on Corridor Rangers to provide Emergency Medical Services, and has caused increased ecological degradation in the form of increased human waste along the trail. We encourage the NPS to address this issue. One possible way to do this would be to begin a permit system for day access to elevations below Indian Gardens/Tip-off on the South and Cottonwood on the North. As Half Dome now has a permit system, so should rim-to-rim activities now be permitted.

Backcountry Toilets

The ever-increasing number of backcountry toilets adversely impacts the visitors experience of wilderness and wilderness camping decisions. The Wilderness Act states "there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area". It should be clear that wilderness is to be free of fixed structures. Though "temporary," backcountry toilets are about as close to a fixed structure as anything you will see in the backcountry. These structures directly impact visitors wilderness experience and alter the backpackers wilderness behavior in that visitors decide to camp near toilets.

This focused visitor decision making increases opportunistic rodent populations at these sites. Increased camping near toilets in wilderness leads to the hardening of campsites near these fixtures. This leads to a need for the park to consider metal lockers to hold backpacker's food, adding another temporary structure to the area. Having the wilderness free of these "behavioral modifications to activities" is what wilderness values are all about.

We encourage Grand Canyon National Park to completely remove the toilets at Monument, Horseshoe Mesa, Upper Tapeats and Clear Creek, instead of building new structures that will need yearly maintenance.

Concurrently, the park should implement a Wag-bag program of solid waste removal for all backcountry wilderness visitors.

Solid waste removal and being responsible for our impacts is a component of being a responsible park steward. There was a time at Grand Canyon when park visitors made campfires in the backcountry. Now we either pack out all our charcoal from fires burned in metal fire pans, use a portable camping stove, or go without. There was a time when backcountry visitors left piles of refuse by their camps. The park now advocates a Leave No Trace footprint. This is the future of responsible stewardship, a future we look to GCNP to take the lead in guiding us toward. Packing out all individual solid waste is a very powerful way to solve the issue of the need for remote backcountry toilets very simply, very economically, and very responsibly.

Thank you for the opportunity to comment on this important process as Grand Canyon National Park updates its Backcountry Management Plan

Sincerely,

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