

**RIVER RUNNERS FOR WILDERNESS
COLORADO RIVER MANAGEMENT PLAN
SCOPING COMMENTS**

October 31, 2002

Joseph F. Alston, Superintendent
Grand Canyon National Park
P.O. Box 129
Grand Canyon, AZ 86023

Dear Superintendent Alston:

River Runners for Wilderness (RRFW) appreciates this opportunity to comment on the Colorado River Management Plan. RRFW represents a broad spectrum of river runners who care about the wilderness resource they are paddling through. This includes the wilderness of the Colorado River as it flows through the park. Our organization has a deep concern for the future of the wilderness in Colorado River in the Grand Canyon.

The Colorado River in Grand Canyon 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 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.

Our scoping comments are focused on the following key areas; River Resource Sustainability, Wilderness Management and Recreational Access.

In reviewing the last thirty years of Colorado River Management, we note the river has been under an escalating conflict between various groups over resource protection, wilderness management and recreational use. We trust that in the context of this unique management plan review and update, Grand Canyon National Park will usher in a visionary plan for the future for Grand Canyon. We encourage you as “guardians of the park” to put forward a plan for resource preservation, wilderness management and recreational use as inspiring and far sighted as the very canyon this plan attempts to manage. We offer the following comments and suggestions as a small signpost toward that goal.

Sincerely,

Tom Martin

Jo Johnson

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RESOURCE PROTECTION

It is imperative that the river ecosystem on which sits wilderness management and recreational activity within wilderness be protected. This must include restoration of the ecological integrity of the river corridor. Glen Canyon Dam has seriously impacted Grand Canyon National Park's river ecosystem. The lack of seasonal flows and water temperatures, combined with the loss of the river's sediment and nutrient base, has severely impacted the river ecosystem. It is also clear that this CRMP must define recreational use limits following wilderness management practice guidelines to protect the resource. The CRMP must be based on a sound foundation of river health and sustainable wilderness recreation. This foundation must include the following points:

Grand Canyon National Park must take the lead role in Colorado River Resource Management.

GCNP must restore the seasonal sediment load into the main stem Colorado into Grand Canyon.

GCNP must restore seasonal flow regimes within Grand Canyon.

GCNP must restore the seasonally variable water temperature in the Colorado through Grand Canyon.

GCNP must restore all aquatic species known to be native to Grand Canyon prior to the operation of Glen Canyon Dam.

GCNP must initiate a non-native eradication program to minimize alien species in the Grand Canyon river corridor.

GCNP must follow minimum requirement analysis for all management activities involved in achieving the above points.

Any project proposed in the Canyon's wilderness areas should utilize the use of volunteers as much as possible.

GCNP must inventory the canyon's biophysical and cultural resources to determine where, and by how much, recreational use has impacted them.

GCNP must inventory the canyon's biophysical and cultural resources to determine how much recreational use is to be allowed.

GCNP must prescribe measurable indicators that will drive management actions when degradation occurs and the imprint of human use becomes noticeable.

Wilderness Management

River Runners for Wilderness recognizes that The Wilderness Act establishes the umbrella under which the river corridor is to be managed. Besides the Wilderness Act, the Colorado River Management Plan must conform to the following laws; the National Park Service Organic Act, the National Environmental Policy Act (NEPA), and the National Park Service Concessions Management Improvement Act. Under the guidelines of the above laws, the CRMP must also follow NPS wilderness management policy in August of 1999 (USDI 2001), specifically Reference Manual 41: Wilderness Preservation and Management, and the 1995 General Management Plan.

We support the park's policy that the Colorado River corridor be designated as wilderness pending the elimination of the non-conforming use of motorboats, an activity prohibited by the Wilderness Act. We note that NPS Wilderness Policy directs park superintendents to manage all categories of wilderness as wilderness. The Wilderness Act clearly directs that wilderness areas are to be managed to preserve natural conditions and wilderness character.

Wilderness management requires GCNP to include the following in the CRMP:

Group sizes should apply equally to all recreational river runners.

Recreational group sizes should be capped at 16 individuals.

Trip contacts should be limited by only allowing 4 trips to launch daily from Lee's Ferry.

Remove the use of helicopters for exchanges from all river concession contracts.

Remove the use of motorized watercraft from all river concession contracts.

River concessions contracts must follow a necessary and appropriate NEPA review following wilderness minimum requirement guidelines.

The spectrum of concessions services must include the ability to hire a "consultant".

RECREATIONAL USE

Once the foundation of sound river resource management and sustainable wilderness recreation guidelines are in place, recreational use with these boundaries must be addressed. It is the belief of River Runners for Wilderness that GCNP's use of an allocation model to provide recreation access has been the cause of much on- and off- river difficulty for the last 30 years. To that end, we offer a detailed model for recreational access that is built within NPS applicable law and policy. Such a model for recreation must be crafted to the unique features of Grand Canyon. Any CRMP access plan must protect the wilderness resource, allow for wilderness compatible river trips, and allow wilderness-based recreation for a diverse population. Given the above framework of wilderness management, RRFW requests GCNP to include the following in the CRMP:

The recreational access plan should be wilderness based.

The recreational access plan should be allocation-free.

The recreational access plan should be motor-free.

The recreational access plan should be helicopter-free.

The recreational access plan should be based on 16 people per group maximum.

The recreational access plan should be based on 4 launches per day.

The recreational access plan should not limit repeat visitation.

As part of our scoping comments, we include a possible recreational access plan that incorporates all of the comments from the three sections Resource Protection, Wilderness Management, and Recreational Use.

RIVER RUNNERS FOR WILDERNESS ACCESS CONTROL SYSTEM

“A CALENDAR INTO FOREVER”

THE BASICS

Wilderness Based

Allocation Free, Motor Free, Helicopter Free

Folks chose an open date in the future, then rent services they need

Group size max = 16, 4 launches/day/365 days a year

Editor’s note: Endnotes are explanatory in nature and do not add new elements to the plan. The reader may feel free to defer reading endnotes until after reading the plan.

ABSTRACT

We propose an allocation free access control system that is seasonally controlled and annually administered in a Wilderness-compliant manner. All potential recreational visitors are controlled through the same access mechanism. The launch platform, on which any access control system sits as a separate section, must be based on wilderness minimum-requirement management policies. Trip duration and group size are formed by the permit holder within a limit of maximum trip size (16 people) regardless of trip type and maximum seasonally adjusted trip length. Trips are reserved as far into the future as the user desires via a web-based reservation system that requires advance identification of some trip participants and the payment of user fees. All participants obtain a registration number for demographic purposes to aid in future management decisions. All participants, including staff, guides and passengers are counted in the trip total of user days. This system offers significantly more launch opportunities for all potential river travelers. Data collected via the universal registration system will be reviewed at regular intervals and can be used for future adjustments of daily launches if indicated.

PROPOSED:

An access-control plan¹ that:

- approximately quadruples the launch opportunities throughout the year for non-commercial recreationists, and makes available up to 1460 launches per year²
- protects the resource³
- is based on allocation-free access⁴
- provides a simple method to collect management data⁵
- removes the several year planning guarantee for concessions contractors⁶
- is simple to administer⁷
- offers all river users the same easy steps in registering for a river trip^{8 9}
- requires compromise from all boaters, not just a few¹⁰
- offers all recreational river runners stability and ease of use
- is fair to all river visitors¹¹
- spreads out peak use and thereby enhances user enjoyment^{12 13}
- allows future changes in other Park management policies without requiring adjustment to the plan itself¹⁴
- establishes “real names, real people” for launch reservations¹⁵

SUMMARY OF USER PERMIT APPLICATION REQUIREMENTS

1. If you want to go on a river trip you make a reservation with Grand Canyon National Park (GCNP) and schedule a date for a permit. You must identify 25% of your trip participants.¹⁶

DEFINITIONS

Launch: a permitted trip leaving Lee’s Ferry

Management year: administrative time measurement used for annual permit planning purposes

Permit: written authorization to launch and complete a river trip in the Grand Canyon

Planning horizon: a length of time in advance of permit launch in which permit holders

may contact concessions contractors for assistance for a river trip.

Reservation: a contract between GCNP and permit holders and alternates guaranteeing the

permit holder and alternates a launch day of the permit holder’s choice.

User-day: (abbreviated, UD) one person multiplied by all or part of a twenty four hour period spent in the canyon; a unit of measuring total use by river runners. Notice that each exchange passenger, both incoming and outgoing, is assessed a user day on the day of the exchange. UD’s will not be used to manage river trips, but will be an established ceiling of total use.

PLAN DESCRIPTION

The following is a brief description of an allocation free access plan based on communication among land management experts, RRFW members, GCNP staff and other interested parties.

Critical Assumptions:

A launch is defined by its departure from Lee's Ferry, not by user-days¹⁷

There will not be a split allocation, as this is an allocation-free system.¹⁸

Access to all users will be controlled by a single access system without variation with regards to user preference once they receive a launch permit.

The number of daily launches will be limited.

The maximum number of daily launches will not be effected by any allocation. This ends the preferential use of one season by any sector.¹⁹

All recreational users count in launch limits – guides, volunteers, staff, passengers, anybody with a pulse.²⁰

This is a motor-free plan.²¹

PROPOSED INITIAL OPERATING CONDITIONS

- There is a maximum of four launches every day, year-round, for a total maximum of 1460 launches per year²² There is no split allocation in this system²³
- The registration system and the ability to obtain reservations will be available 24 hours a day, seven days a week throughout the year²⁴
- Maximum trip duration varied by season, up to 30 days in winter²⁵
- Maximum group size of 16 including staff, volunteers and passengers²⁶
- The total number of user-days by all users will be limited by NPS to protect the resource²⁷

PHILOSOPHY

- Problems within the existing system cannot be fixed by changes in the non-commercial sector only.
- The plan will disrupt commercial systems as little as possible²⁸
- People deserve timely and equitable access to the Canyon.
- Commercial operations can change and still be profitable²⁹
- Non-commercial access has been stifled unfairly since at least 1972 and immediate steps are required to stop injustices and prevent them in the future.

PLAN IMPLEMENTATION

Grand Canyon National Park (GCNP) shall establish a database that issues and tracks reservations. The database compiles and displays additional information on a publicly accessible and interactive World Wide Web site. Among other things, the database measures the time between reservation and launch for every river trip. The NPS shall regularly review the information and may use it to aid in future management decisions.

When a person wants to go on a river trip, that person must receive a reservation from GCNP, and supply a photo ID number and the necessary payment (see Appendix for examples). Persons may hold only one registration number at a time, but are not limited in participating in other river trips.³⁰

PROVISIONS FOR COMMERCIAL SERVICES

Grand Canyon National Park shall authorize concession contractors and or Incidental Business Permits to provide services to river trip reservation holders. Such services may include livery gear, guide, cook, interpretive, and other services as deemed necessary by GCNP. Commercial services booked farther in advance than the period for which the concession contract is valid would be made at the risk of cancellation or transfer to another contractor if the contract for the concession contractor were terminated before the launches were made. GCNP will monitor the spectrum of commercial services for quality and safety. GCNP will be responsive to what kind of support services the public prefers.

PROVISIONS FOR THE GENERAL PUBLIC

The management of river use will do away with the split differentiation between Commercial Operating Requirements and Non-Commercial Operating Requirements. All river trips will follow one guiding set of Grand Canyon River Trip Requirements. Persons wanting a reserved launch shall obtain a reservation from GCNP.

A person wanting a reservation contacts the GCNP web site, selecting an available launch day, identifying at least 25% of the people who intend to go on the trip and paying all the user fees for the trip.³¹

The fees paid at this time are permit management charges and Park entrance fees for all the trip participants. The NPS will notify successful and unsuccessful applicants for launch reservations immediately on the World Wide Web, and by telephone and/or e-mail if the user desires.³²

Default on the payment would result in the reservation being cancelled. The identified individuals on the permit may act as alternate permit holders to safeguard the trip from cancellation if the permit holder cannot go on the trip. At least 25% of the originally identified individuals must go on the trip to avoid canceling the reservation.³³ This means that no fewer than 6.25% of all the people on the trip must have been identified on the permit reservation.

Permit holders and alternates may not be listed on more than one launch reservation at a time. If a boater has a permit or is named as an alternate TL on any other reservation, then he cannot hold another reservation or be listed as an alternate TL on any other reservation. Likewise, he cannot be listed as an alternate TL (part of the required 25% identified participants when a reservation is issued) on more than one reservation at a time. This does not prevent people from participating in other trips while they are waiting for their own launch - it just prevents them from being an actual TL or alternate TL until the reservation on which they are listed actually launches.

COMMON PROVISIONS AND SAFEGUARDS

To keep the system operating to everyone's advantage, it is necessary to institute a variety of controls (such as limits on number of launches, resource protection limits, trip duration and party size), some of which are designed to limit the potential for abuse.³⁴

The NPS shall advise individuals with new river trip reservations of the available resources for

planning a river trip such as a list of concession contractors, service organizations, web sites, public interest databases, etc.

Participants in all recreational river trips, whether using livery and/or guide services, must attend the same resource protection educational presentation given by the NPS at Lee's Ferry prior to launch. This presentation may be viewed up to 2 days prior to actual trip launch.

The NPS shall review the data collected by the universal boater reservation system, and any additional data, at least every two years. The data used shall be constantly updated and publicly available on the reservation web site. If review and analysis of the data indicate that management changes are needed, then the NPS shall immediately engage in a NEPA-compliant change process. Factors for the analysis should include types of users, trip variables such as duration and group size, wait-time for trips in a particular season, and sociological measures such as results of customer satisfaction surveys. Naturally, this review would not impact the Waiting List system until the current waiting list members have all taken their river trips.

NON-COMMERCIAL WAITING LIST TRANSITION

- Transitioning from the present Waiting List will be as follows: The Waiting List will be allowed to be serviced at its present launch number of 250 launches per year.
- Two launches on Wednesday and 1 launch every other day for the summer half of the year will be allowed to launch off the Waiting list with 42 launches offered in the rest of the year, as is presently offered.
- Waiting List participants will either remain on the Waiting List or join the reservation system to claim a launch, but will not be allowed to be in both the reservation and Waiting List at the same time.
- Once the new management plan is in operation, no new additions will be allowed onto the Waiting List.
- Anticipated phase out of the Waiting List to be completed between 2010 and 2016.

ADMINISTRATIVE SECTOR PROVISIONS

Trips for research, resource protection and other administrative or scientific purposes are now conducted routinely. For the sake of accountability, a posting on the reservation calendar web page of at least the following information is required: all administrative trip itineraries, sponsors, participant lists, participant roles, titles of papers written or proposed based on the trips, funding sources and a summary of the work actually completed.

The administrative sector trips are limited by the same group size and trip lengths as are imposed on all recreational users. Administrative trip scheduling is not controlled by the recreational user access reservation system. The administrative sector trips are not counted in the maximum number of launches per day, and they may be scheduled at the discretion of the NPS. Naturally, the NPS would not want to cluster its launches in such a way as to degrade the wilderness-like experience of all river users. The NPS will not use river trips for administrative or scientific purposes unless it is necessary, appropriate and approved via minimum requirement analysis.

RESOURCE PROTECTION PROVISIONS

As stated elsewhere with citations of applicable law and policy, the wilderness resource of Grand Canyon National Park, including natural, cultural, and historic resources, will be protected, preserved, and restored where possible. Minimizing the impacts of river runners while still optimizing access is addressed herein.

The Allocation-Free Access Control system is dependent on changes in these resource protection provisions.

Motor powered watercraft will be discontinued on January 1, 2006.

A maximum user day ceiling will be established. This ceiling is subject to alteration provided trip contacts maintain their wilderness character and resource preservation is assured.

There will be no helicopter passenger exchanges within the Canyon.³⁵

Existing environmental protection regulations such as mandatory use of fire pans, waste containment systems, waste removal, no pets, etc. shall remain in force. It is recommended that hikers transport their human waste at least ½ mile from the river and bury it or remove it from the Canyon. River-based hikers are encouraged to utilize their mandated toilet systems prior to conducting hikes away from the river. Toilet paper may not be left in the canyon.

LAUNCH MANAGEMENT PROVISIONS

Seasons would be established as follows:

Table 1. Launch Calendar

SEASON	CALENDAR DATES	MAX TRIP LENGTH
Spring	March 1-31	21 Days
Summer	April 1- September 30	18 Days
Fall	October 1- November 30	21 Days
Winter	December 1- February 28	30 Days

The above table is as follows:

Spring season is March 1-31, 21 day trip length

Summer season is April 1 to September 30, 18 day trip length

Fall season is October 1-November 30, 21 day trip length

Winter season is December 1-February 28, 30 day trip length

All trip lengths are to Diamond Creek.

The number of people or number of boats launching per day is not controlled except by the maximum group size of 16. For example, a group of 16 kayakers could launch 16 kayaks but could only be on the water for 18 days in the summer season. There shall be no more than four

launches per day throughout the year.

CONCLUSIONS
OPTION #1
A CALENDAR INTO FOREVER

This proposal serves to

1. Introduce an allocation free access system.
2. establish a publicly available reservation calendar for all launches.
3. expand the services and business competition for the commercial outfitters.
4. is Wilderness-compatible.
5. eliminates the need for GCNP to adjust allocation in the future while allowing the agency flexibility in resource management.
6. eliminates the exchange-day exemption from user-day count.
7. allows up to 4 launches per day year round.
8. is flexible by offering launches without user day constraints.
9. allows people to go on frequent river trips.
10. requires administrative accountability, is easy and inexpensive to administer, in part because of computer-based controls.

¹ RRFW recognizes the truism that wilderness resources cannot support unlimited demand. At one point, unchecked use levels degrade the very wilderness qualities that attract recreationists. To that end we propose a system for managing the use of the river by controlling how people gain access to it. In Grand Canyon, the river allocation model has been shown to foster a negative visitor experience for the last 30 years. This plan completely eliminates the concept of splitting allocation, since the very concept of a split allocation can not be assured to serve all user groups unless some measure of demand is tracked, and adjustments made to accommodate, all user groups seeking a river permit.

² The biggest deterrent to getting on a non-commercial river trip is the lack of launch opportunities. There is at present a forecasted 20-year wait for a non-commercial river trip. This is in contrast to same season booking for a river concession river trip, where excessively high pricing is used to limit demand. The core of RRFW's access control plan is to increase launch opportunities for all potential river runners, without using price as a controller of demand.

³ RRFW has no economic interest in sustaining any particular level of human use in the canyon. We support Wilderness designation of the river corridor and we support treatment of the river corridor as wilderness until such designation is made. We believe that potential concessionaires have an opportunity to make a profit without the use of motorized tour boats or the use of helicopters for exchanging passengers.

⁴ RRFW has considered split allocation systems. RRFW finds allocation systems rife with charges of special interest manipulation, a need for identifying an ever-expanding spectrum of groups requiring an allocation, and a need to constantly monitor changes in use patterns based on economic and environmental considerations. Such constant monitoring renders a split allocation system impossible for a managing agency to control.

⁵ The National Park Service desires to have data on which to base future management decisions and so measurement of parameters is required. This plan measures waiting-time for the many kinds of people who want to gain access to a river trip. This plan also allows measuring the customer satisfaction with waiting-time. Other social and environmental factors can be measured as well.

⁶ Businesses may desire stability and guaranteed markets, but such guarantees often come at the loss of competition and flexibility. This system introduces the need for competition and business flexibility, as user needs will be

expected to change over time, and this system will allow business services the flexibility to match those needs as they arrive.

⁷ A simple set of web pages is constructed so that a computer manages reservations. The Lee's Ferry Ranger has no more to do than now, and the river permits office has less to do.

⁸ RRFW believes that all interested people should have the ability to obtain, on an equal and timely basis, an opportunity to experience a float trip through the Grand Canyon while protecting the resource.

⁹ Registering is simply letting the Park know in an official way that a person is interested in going on a river trip. It takes a phone call or a post card or a visit in person or to a web site and a small payment. (See the Appendix for examples of registration.) The registration number assigned to a person is only used by the NPS to determine how long a person waited after registering before going on a river trip. No personal information is sought or used, even for the possible purpose of gathering data on Frequent River Use. The concept that Frequent River Users could cause a lengthening of the launch reservation calendar is unsound.

¹⁰ In the early stages of the 1997 CRMP that was unilaterally terminated by GCNP, some parties at the scoping meetings proclaimed that the only problem with the access control system in place at the time was the private boater waiting list. This is simply not true. The problem is in maintaining a spilt-allocation system with guaranteed allocations to 17 specific user groups (16 concession contracts and 1 contract for non-concessioned access). This system, along with motorized watercraft use, has resulted in 30 years of on and off river contention and must be terminated in favor of a system that has ongoing flexibility and utility while following motor-free wilderness management. Such a system necessarily requires changes in all aspects of access, not just one sector. The wilderness needs accommodation it has not heretofore received and all recreational river visitors need parity of access. As a result of these two factors, a probable outcome of this plan is that concession contractors will have to make adjustments to their way of doing business.

¹¹ Compare these two scenarios and see which one sounds fairer. Scenario 1: a non-commercial river runner waits 20 years for a permit and meanwhile a commercial customer can pay a high price for access and go on a trip within one year because the concessions contractors have over 4 times the access opportunities and limit their demand with high pricing. Scenario 2: there is no fixed allocation for any user group. There is no need to track demand between user groups by the NPS. There is no need to modify the access system based on economic or environmental changes.

¹² Instead of clustering launches on particular days of the week and particular months of the year, in this proposal launches are spread more evenly throughout the year so large pulses of people through the canyon will be reduced. The river running public may generally prefer to boat through the canyon in the summer, but in a system with high demand and recreational paddling 365 days a year, there are paddlers available to float the canyon any time. High demand means concessions contractors can service trips throughout the year.

Clustering launches has led to severe impacts including resource degradation. RRFW seeks to reduce those impacts by limiting launches to a more sane 4 per day as opposed to the six to 7 that are allowed now. We believe that fewer than four launches per day would be used in winter when some of the canyon users may prefer a more solitary experience. Meanwhile, four launches per day in spring and fall months would allow more launches in those seasons than exist now.

In the 4 launch per day system, the public's desire for a particular type of trip will be displayed by the filling of the launch calendar. In the future, the NPS could establish different limits on the number of launches if resource or experience protection were necessary, but the limits could be based on patterns seen in the actual reservation calendar rather than on assumptions about what the public might want.

¹³ Two of the criteria for determining the quality of a canyon trip are the number of trip contacts and their quality. In general, the more contacts the less enjoyable the trip even if all the contacts are amicable. With the inherent unfairness of today's system, more and more of the contacts are flavored with resentment and retaliation. The new system will not only reduce the latent animosity among user groups it will also reduce the number of trip contacts simply by spreading the use over more months of the calendar.

¹⁴ Every management system must have the ability to change, as the resource the system attempts to serve will change over time. RRFW realizes the need for comprehensive and updated CRMP's, and also realizes that flexibility must be written into the CRMP. This plan contains variables that can be changed by the NPS without affecting the inherent fairness of the plan. For example, NPS could adjust the parameters for any of several reasons – to match changes that may occur in the river corridor, to change the number of administrative users, etc. Such flexibility gives

NPS great latitude in administering the plan without affecting its fairness.

¹⁵ In early CRMP scoping meetings there were people who suggested that “real people” having a chance to schedule for “real dates” has merit. RRFW recognizes that NPS may use application “hurdles” to limit demand for river access. One such “hurdle” may include a serious commitment to a launch reservation. RRFW feels hard “hurdles”, as posting high financial bonds are unacceptable. RRFW feels that soft “hurdles” may be used, such as requiring the all permit holders to identify some of its trip’s participants at the time of reservation. Requiring all river trip permit hopefuls to go through the same application process eliminates the NPS requirement to keep split-allocation models free of arbitrary pressures.

¹⁶ Making a reservation is just that. It takes about five minutes and can be done on the phone, via mail, in person or on the Internet. Getting a reservation:

- * Does NOT require you to use any concessions services
- * Does NOT require you to avoid using concessions services
- * Does NOT put you in any waiting line
- * Does NOT, in fact, commit you to floating down the river at all.
- * It IS your permit to be on the river.
- * Does require you to reserve a launch date

¹⁷ River managers throughout the west have successfully used launch management to control downstream impacts of river running. It is the simplest method of limiting boat ramp chaos and achieving goals for scheduling and resource protection. The term “User-day” has been widely disparaged because of the cumbersome accounting it has caused in the past, and the fact that a user day system may drive managers to ever-faster trips to maximize use at the expense of actually spending time in the resource. In the RRFW plan, user-days are employed as a maximum ceiling on use, but are not used to restrict river trip activity. It is a simple metric for resource protection but is inappropriate in most other applications.

¹⁸ Abhorrent is a word used to describe the previous 20 years of fixed allocation contention. This is one of many reasons to put forward an allocation-free access model. The allocated system stands in sharp contrast to an allocation-free system. RRFW feels some types of allocation-free access models could work rather well. It is the challenge of GCNP to meet unwarranted resistance from stakeholders fearful of change and wanting guarantees in managing this great treasure.

¹⁹ In the last thirty years the concession contractors have had a disproportionately large share of the summer launches. One often hears the justifications that customers get vacations only in the summer or that their children can only get off school in the summer. However, this justification applies to all river runners, not just one user group. The RRFW proposal allows for an equal opportunity for access to the river during all seasons of the year, thus fairness in access is assured.

²⁰ For the last 22 years guides and other staff have not been counted in the UD total of concessionaires’ trips, yet at the same time, all individuals of non-commercial trips have been counted. It is past time to correct the inequity by counting guides, private users, private trip leaders, commercial passengers, volunteers, students, Park staff, employers, etc. – anyone with a pulse – in the tally of users.

²¹ As contentious as the split allocation system, motorized use in the river corridor has been the other bone of contention for the last 3 decades. A motor-free river will return the resource to the mission and vision of the National Park Service. The supporting law and policy for a motor-free river corridor are already presented in the wilderness section of these comments.

²² The compelling reason for seasonal limitations on number of launches, group size, and/or trip duration would be for the protection of the resource and the visitor experience. Given the absence of an allocation, the public will decide what sort of distribution is appropriate.

²³ Many Western river management agencies that control river access have historically embraced the allocation model, with its resultant inherent inequities. As demographics have changed, and non-commercial demand skyrocketed, the concept of a split allocation system becomes more and more untenable

²⁴ The fixed 12-month calendar is the easiest, most intuitive management calendar, but others, notably the 1-month rolling calendar, could be used. The shorter calendars would enable utilization of the most launches possible at the expense of some confusion and complexity. Among other effects, the annual calendar would release a pulse of uncommitted launches at the same time every year, an advantage to people who don’t like to do the same application exercise over and over 12 times a year. On the other hand, the rolling calendar would release 12 smaller pulses of

uncommitted launches for those who wanted to call in more often.

²⁵ Maximum trip duration is an experiential issue. As part of our wilderness heritage, long (> 30 days) wilderness trips should remain an option for river travelers. Such a long trip was allowed up to 1972 in the summer, when summer use was reduced to 18 days maximum. RRFW believes that longer duration river trip length must remain a part of the Grand Canyon wilderness river trip option.

²⁶ Maximum trip size is offered as a way of limiting on and off river contacts, controlling campsite impacts, and maintaining the wilderness experience. Larger groups cause increased trip contact, have disproportionately larger impacts on camps than do smaller groups, and remove the wilderness quality of a river trip. Non-commercial river groups have been limited to 16 since 1972. RRFW supports this group size and recognizes that while large for wilderness areas, this maximum size should be maintained for all river groups.

²⁷ The NPS establishes UD ceilings for resource protection. This ceiling allows a maximum number assuming all trips fill and all trips are at maximum length. The cornerstone of this plan is to minimize trip contacts, to decrease the peak summer overuse that presently occurs, and to spread use throughout the entire year.

²⁸ RRFW recognizes the need for wilderness visitors to maintain the ability to use guide and livery services. RRFW encourages GCNP to allow such services to be available to the potential river traveler on an “as needed” basis, thus allowing the greatest flexibility in user preference while maintaining wilderness regulations on the river. The goal of river travel in Grand Canyon should be to maintain and enhance harmony on the river among various user groups. In order to achieve that end, special considerations to any one business sector, including NPS concessions, must be terminated. This system achieves that goal.

²⁹ Change is inherent in all business enterprise. The concessionaires have enjoyed an artificially secure market for 30 years. Implementation of this plan will surely cause pain to some people and pleasure to others. RRFW can imagine profitable businesses that come to the new river plan with open minds and a determination to serve the public. We believe that businesses can retool effectively, but if they cannot then they would not be serving the public’s interests.

³⁰ This provision allows people, including permit holders (trip leaders in today’s system), to go on as many trips as they want every year whether they have a launch reserved (*i.e.* a permit) or not. All river runners are given the same privilege to go on multiple trips every year.

³¹ Individual trip leaders reserve a launch on a specified day, not a suite of days that might become launch days. This is because the launch calendar is on-line (*e.g.* at www.rivertripsnow.gov), so any person can see at a glance what days are available for the next ten or more years. Third, the permit holder and as many alternates as desired must identify themselves to be on the trip. Obviously the permit holder is identified but it is advantageous to identify alternates so that the trip will not be cancelled if the permit holder cannot go on the trip. Fourth, the permit holder must pay the user fees for the entire trip. This measure helps ensure sincerity of interest. The system encourages users to form their trips well in advance so the costs can be shared from the beginning (see Appendix). However, this system does not prevent or discourage last-minute registrations.

³² Computer based reservation systems are already in place for reservations for Western rivers and backcountry areas. Computer science professionals have validated the system described. The user would be largely unaware of any complexities.

³³ At least one identified person must go on the trip. Otherwise there would be vast speculation in river trip permits. As the number of identified people required goes up, the surety of reservations goes up, leading to a minimal waiting time but maximal inconvenience. Requiring only one sixteenth of the entire group to be identified in advance is chosen as a reasonable compromise.

³⁴ Abuse would be one of two types: doing something illegal and lying about it to your advantage and/or somebody else’s or the resource’s disadvantage; or knowingly taking advantage of a weak or non-existent control (rule) for your own gain and loss to a person or resource. The aim of any proposal is to make fair rules that keep people civilized and protect the resource. Those rules need to be enforceable, and they need easy monitoring and clear penalties.

³⁵ This is not strictly an access control issue and is included as part of the overall RRFW river management plan. Eliminating helicopter exchanges will contribute greatly to the wilderness experience in Grand Canyon.