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Grand Canyon River Guides, Inc., (GCRG) founded in 1988, is unique in that it provides a unified voice for river guides and river runners in defense of the Colorado River corridor through Grand Canyon. Our non-profit educational and environmental 501(c)(3) organization is comprised of over 1,700 individuals who are passionately dedicated to the continuing preservation of this national icon. The Grand Canyon experience has a remarkable effect on our lives and it inspires us to preserve its legacy for future generations. Our mission is to:

Protect the Grand Canyon
Provide the best possible river experience
Set the highest standards for the guiding profession
Celebrate the unique spirit of the river community

Accordingly, Grand Canyon River Guides would like to respectfully offer our comments on the Draft EIS of the Backcountry Management Plan (BCMP) for Grand Canyon National Park through the lens of the river running community, specifically honing in on areas where the BCMP may have ramifications for the river corridor, river related resources, or to commercial and private river runners themselves.

ISSUE: The BCMP should NOT apply to river runners nor impinge upon Colorado River management

Discussion: The Backcountry Management Plan Draft EIS was not written with the intent of applying to river trips, nor should it be. The Colorado River Management Plan (CRMP) clearly fills that role and has been doing so effectively for a decade. Although the "Items Outside of Scope of Analysis" section for the BCMP includes Colorado River Management, the language throughout the DEIS fails to reinforce that message or make it clear. Examples of this are "No commercial services would be permitted in the Wild Zone," (Pages 55 & 56) or the fact that maximum group size for "commercial day hiking" in the BCMP is 11, when a river trip group size might be much bigger than that because they are hiking *from the river*.

This distinction is blurred even further when the BCMP defines the newly created “River Zone” and states: “The creation of this new zone would help protect vegetation resources from further damage to the greatest extent possible by *integrating management of use by both river-runners and hikers.*” (Page 269). It is of note that the DEIS uses italics to emphasize that point which seems to imply that all the management rules for the two user groups would be the same, when they are not. Although this DEIS plan proposes to adopt the CRMP River Zone concept as an element of backcountry management and as a tool to address river related resource issues, it is not the same as “integrating management” between the two plans. The CRMP cannot be “outside the scope” of the BCMP and simultaneously “integrated” as well.

Solution: Make the distinction absolutely clear that the BCMP does *not* apply to river trips as they access the backcountry, routes or trails by making the following adjustments:

- 1) Change the innumerable references to “guiding” or “guides” throughout this BCMP document to specify backcountry guiding or backcountry guides.
- 2) Change any references to commercial services or commercial day hiking to make clear that it only applies to commercial backcountry outfitters.
- 3) Clarify that any permit/fee system introduced through this plan or subsequent adaptive management would NOT apply to river trip exchanges hiking in or out of the canyon.
- 4) Adjust the language in the BCMP to make it clear that the plan is not “integrating management” between river runners and backcountry hikers, nor between their respective management plans.

It is important to *get the language right* throughout the BCMP document and reinforce this distinction to eliminate confusion over the life of the plan.

ISSUE: River Assisted Backcountry Travel (RABT) should not adversely impact river trips, beaches

Discussion: GCRG acknowledges the need to further regulate this increasingly popular activity, but we would like to emphasize that that RABT is part of an *overland route* that could not otherwise be safely or conveniently completed without crossing the Colorado River. In other words, packrafting is a necessity to get from Point A to Point B – a means to an end, and not the primary focus. Therefore, no aspect of RABT should negatively impact river runners nor cause negative impacts to camping beaches along the river corridor. GCRG’s specific concerns are:

- 1) The BCMP does not specify where packrafters can and cannot camp. Since the maximum group size for RABT is six, allowing them to camp on inappropriate sized beaches used by river trips would be extremely problematic, exacerbating crowding and congestion and adversely affecting the river experience.
- 2) Congestion is already an issue particularly at river corridor exchange camps. Adding unanticipated packrafting groups to the equation would make the situation all the more problematic.

- 3) Adverse impacts to Colorado River corridor beaches may occur since packrafters are not subject to the same stringent management rules as river trips. As RABT use increases in popularity, so too may potential beach impacts which could range from fires on the beaches without fire pans, trash, human waste on beaches, impacts to the Old High Water Zone and fragile archaeological terraces, etc.... This scenario is exacerbated by the fact that RABT use of Colorado River beaches would be almost impossible to regulate or enforce.
- 4) Packrafters should be self-sustainable and responsible for their personal on-water safety.

Solution: There are specific rules in the CRMP for where river runners can and cannot camp. Similarly, there should be specific camping rules within the BCMP for River Assisted Backcountry Travel as well. Do not allow packrafters to camp on river corridor beaches unless they are designated backcountry sites in the River Zone. The focus of their trip is the backcountry – to cross the river and move on.

ISSUE – Human Waste

Discussion: While GCRG concurs with the rule to carry out solid human waste, how likely is it that RABT and all backcountry hikers will actually carry it out from the River Zone backcountry sites or from multiple-day commercially guided backpacking trips in areas without toilets?

Solution: The concept of adaptive management will certainly need to come into play here as the NPS seeks to weigh the protection of the resource with the preservation of wilderness character. The NPS should pay very close attention to negative impacts to camping beaches along the river corridor through the use of NPS campsite monitoring trips. River stakeholders should also be consulted for first-hand observations and possible solutions.

Issue: Trail running

Discussion: Trail running (and trail running in groups) has increased dramatically in popularity. Large trail running groups and their associated impacts (conflict between user groups, lack of trail etiquette, trash, feces, etc...) can negatively affect clients hiking in or out of river trips. The Need for Action section (Page 1) specifically addresses these emerging recreational uses because they are putting increasing demands on park resources that were not envisioned during the 1988 BCMP plan. This updated plan even acknowledges that trail running is an activity that *overtasks park staff* (Pages xxiv and 93) and specifies that adaptive management would be used to further address the associated problems.

Solution: Why wait for potential adaptive management to set group size limits for trail running if negative impacts to the visitor experience and park resources are already occurring to the point that these activities currently overtask staff? Addressing and mitigating the impacts of new and emerging uses such as trail running are in large part the driving force behind of the update of this plan. Therefore, upon implementation, the BCMP should set a reasonable group size limit, and subsequently monitor and adjust as needed using the concept of adaptive management. And again, reaching out to other canyon/river stakeholders to provide input and observations on how well the new rules are meeting management goals would be helpful to the park.

Issue: Adaptive Management

Discussion: The adaptive management component of the BCMP will be especially critical since there may be unintended consequences and additional impacts the NPS simply can't foresee. This necessitates a great degree of flexibility and the ability to adapt to changing conditions during the lifetime of the plan.

Solution: Make sure to establish open and regular communication with all canyon and river stakeholders. Where the concept of adaptive management pertains to the River Zone or the Corridor Trails utilized by river trips, GCRG would like to have the opportunity to provide our on-the-ground knowledge and specialized input for any decision-making process. This is especially true of any consideration of future closure recommendations, area restrictions, or treatment actions that could directly or indirectly affect the recreational river running experience. *Stakeholder communication should be a standard component of adaptive management protocol.*

ISSUE: Deer Creek Narrows Closure

Discussion: No single decision carries more weight and lasting consequence than the closure of an area within a national park. Therefore, the way in which closures are approached and the decision-making process itself are of utmost importance. The 2012 decision to close Deer Creek Narrows to all public visitation was essentially a flawed process – made without any stakeholder input or communication, with no firm understanding of visitor usage or adequate data in that regard, nor was there an opportunity for all parties to come together and work collaboratively to find a solution that would be mutually agreeable. What the NPS found out *after the fact* was that canyon and river stakeholders alike care deeply about the Deer Creek Narrows with a universal desire to have been involved far in advance of any final decision. By the Superintendent's own admission, "... neither I nor my park staff believed the restriction would be controversial in nature." (Letter from Superintendent Uberuaga to Grand Canyon River Guides dated 9/20/12).

And controversial it is indeed. The GCRG Board of Directors and Officers have no consensus opinion, and it is clear that the divergent views we hold are highly reflective of the divisions within the broader river community on this emotionally-laden issue. Therefore, GCRG would like to take this opportunity to briefly articulate the two most prevalent viewpoints. We do so in order to show respect for both views while highlighting the inherent challenges that are found where tribal perspectives and Traditional Cultural Properties (TCPs) impinge upon public access on federal lands:

Viewpoint A: Supporting the closure

To the Southern Paiute people, the Deer Creek Narrows is the portal to their underworld – the place where their spirits take the final leap to the afterlife. The sacredness of this deep chasm where past, present and future meet is so profound that the presence of park visitors in the Narrows has ultimately caused an imbalance in Paiute culture. Many within the river community support the closure as a way to better protect and honor the traditional cultural properties of this area that are so central and

ultimately vital to Paiute cultural values and lifeway. A number of our board members have said: “Knowing what I know now, I would not feel comfortable going down there or leading a trip into the Narrows.” And as river guide Christa Sadler expressed, “If I am basing my guest’s experience of the canyon on visiting one place, I am missing the point of a Grand Canyon trip.” (BQR, Vol 25, #4, Winter 2012/2013).

Viewpoint B: Against the closure

At the core is the vigorous defense of our fundamental right as Americans to retain public access to our federal lands that were set aside for everyone to enjoy in perpetuity. Those who embrace this viewpoint also point out that this slot canyon experiences frequent and violent flash floods which regularly scour it of any human impacts, and they object to closing an area based on protecting it primarily from metaphysical harm. Also woven in are strong beliefs in the traditional cultural properties of river runners themselves; a living culture with Colorado River traditions, both written and oral, that span close to one hundred and fifty years. Many individuals have strong, deeply personal connections with the Narrows, considering it to be one of the most special and even most sacred places in the entire world. To be denied access forever would be an incalculable loss.

We are sure that the NPS will receive countless comments going into much greater depth, and we in no way wish to oversimplify this complex and extremely challenging issue. The ultimate conundrum is that many of us can understand and appreciate varying aspects of both sides of the argument, while also being extremely concerned with the precedence this may set for future closures within Grand Canyon National Park.

Although we understand that site restrictions may occasionally be warranted for the protection of the natural and cultural resources of Grand Canyon, we also view closures or restrictions as a *last resort*. GCRG supports a more incremental approach to resource protection that proceeds along a continuum, from the least intrusive mitigation measures such as education, on through a full spectrum of feasible actions. All other actions should be taken and exhausted before closure is considered. That was clearly not the case here.

We would like to make four final points:

- While the NEPA process of the Backcountry Management Plan Draft EIS allows for public comment, it does not rectify or absolve the flawed process that got us to this point.
- This Backcountry Management Plan DEIS does not provide detailed information on the reasons behind the closure recommendation so that the public can make a well-informed decision on whether it is warranted.
- Grand Canyon River Guides is a concurring party for the Cultural Programmatic Agreement of Grand Canyon National Park, yet we were not consulted in advance of the closure or involved in the decision making process.

- Education is the least invasive and most effective tool for preserving irreplaceable historic properties, and as such, education is the *precursor* to stewardship. Consequently, education should be a long term management strategy when dealing with culturally sensitive areas.

Solution: Retain the TEMPORARY status of the Deer Creek Narrows closure and subsequently utilize adaptive management to bring ALL interested stakeholder groups together with the NPS and the Paiute tribe to sit down together and work towards a mutually agreed upon solution. This collaborative process would also consider and integrate the public comments the park has received subsequent to the closure, including through this NEPA process. In other words, we are asking for a re-evaluation -- a transparent, respectful, and collective decision-making process done the *right way*.

As active guides and stewards of Grand Canyon we experience the effects of management along the river corridor on a daily basis. This National Park and river corridor is a place many of us have dedicated our lives to learning about and protecting through our jobs and our educational interactions with passengers on trips. Grand Canyon River Guides offers these comments, not only as our duty in this public process, but also as an opportunity to demonstrate to the park our shared commitment to the continued protection and preservation of this resource and our desire to work together as partners towards that worthy end. Please review our comments and feel free to contact us with any questions you may have.

Sincerely,

Grand Canyon River Guides, Inc.

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