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Ms. Jennifer Dierker
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Dear Jen,

As a concurring party to the Programmatic Agreement for the Colorado River Management Plan, Grand Canyon River Guides is honored to inject a “guide perspective” towards the refinement and finalization of the CRMP Historic Property Monitoring and Management Plan. Accordingly, GCRG offers the following suggestions for your consideration.

EDUCATIONAL OUTREACH

As an educational and environmental organization, GCRG firmly believes that education is the key to building stewardship and advocacy for our natural and cultural resources in Grand Canyon. Education is the least invasive and most cost efficient tool for building the public’s appreciation of these fragile resources -- if river runners understand *why* these resources are important, they will consequently value and protect them. To be blunt, would you rather spend NPS staff time and resources obliterating social trailing, or possibly prevent it in the first place? The answer seems clear.

Public outreach and education should therefore be the first line of defense in any management plan that specifically addresses visitor use impacts. In order to successfully build a comprehensive education strategy into this Plan, GCRG suggests:

- ❖ **Include educational outreach in your list of primary management questions** posed on Page 2. Possible questions might include:

1) How effective is educational outreach at minimizing impacts from visitation, and does its effectiveness change based on whether the sites are attraction or ancillary?

2) *Is educational outreach an effective tool for reducing impacts from recreation when used solely as opposed to in conjunction with other treatment actions?*

3) *How does the effectiveness of educational outreach as a management strategy change over time?*

- ❖ **Include educational outreach as both short and long term strategies** in order to most efficiently and effectively manage the monitoring program. This will allow the NPS to discern answers to the management questions we've posed above.
- ❖ **Include educational outreach as a viable and approved treatment option** for the mitigation of impacts to cultural resources in Grand Canyon. GCRG suggests the following draft language for inclusion in Appendix C:

Treatment: Educational Outreach

Purpose: Increase public awareness and stewardship of historic properties in Grand Canyon National Park

Description: Educate the river running public and increase stewardship by publishing articles in a variety of existing media venues, and/or developing new educational materials. The focus of the educational outreach program would be multifaceted: 1) educate about "leave no trace" ethics and principles including the problems associated with social trailing, 2) build awareness of the fragility of historic properties, *why* they should be preserved, and ways to avoid impacts to sensitive high terraces, 3) elucidate ways to reduce impacts and congestion at attraction sites 4) share information about culturally sensitive areas, traditional cultural properties, and tribal concerns to the extent possible, 5) provide periodic updates on monitoring activities, challenges, and possible treatments 6) engage the public through education and interaction with archaeologists "in situ" (example: Furnace Flat excavations).

Success Criteria: Ongoing learning opportunities, improved stewardship through education, transparency of monitoring program.

Our suggested educational strategy can be employed through a variety of means: articles in existing stakeholder publications (GCRG, GCPBA, GCRRA), periodic email/informational alerts (perhaps a "tip of the month" during the river season), websites (NPS and stakeholder websites), informational materials (flyers, posters, orientation) at Lees Ferry, targeted flyers in private permit packets, as well as collaborative efforts between stakeholders, NPS and tribes. Educational outreach should address both general concepts as well as updates on specific monitoring activities/problem areas when appropriate.

Communication and collaboration between many river stakeholders has improved markedly since the implementation of the CRMP. Cooperative efforts such as the River Courtesy flyer exhibit our willingness to help Grand Canyon National Park reach out to the river running public in ways that are both positive and proactive. GCRG is ready and willing to assist you in

developing materials and coordinating collaboration with other stakeholder groups if desired. By utilizing the resources and ideas of not only GCRG, but other supportive stakeholders, the benefits reaped by the CRMP will be manifold: *solid and productive NPS/stakeholder relations, and improved stewardship, advocacy, and transparency.*

SIMPLIFICATION, ORGANIZATION & CLARITY

The plan, the protocols, and the forms that encompass the Historic Properties Monitoring and Management Plan seem unnecessarily complicated and confusing. Specifically, our recommendations are:

- ❖ **Pared down, streamlined and specifically targeted forms and procedures** will result in more efficient monitoring which should be the ultimate goal for the CRMP.
- ❖ **A clearer articulation of what the NPS is “managing for”** will help elucidate when conditions are approaching, at, or outside of standards.
- ❖ **Organizationally, the plan could be much improved through changes to the monitoring form and the associated variables in order to make clearer distinctions between human and natural caused disturbances.** This ability is critical for 1) determining whether visitor use is impacting these resources, 2) determining what type(s) of treatment options would be most effective on a site-by-site basis, 3) facilitating recordation, and 4) ensuring accuracy.

Specifically, GCRG recommends **revising the Activity/Process list** into primary categories of Human Activities and Natural Forces, with subcategories for each, and causalities within each of those subcategories. We have attached our suggested revision for your review and consideration. You’ll note that because the CRMP is primarily a visitor use plan, we suggest listing those causalities associated with visitor impacts first.

Consequently, **the monitoring form might be changed** as follows (additions in italics):

Activity/Process: *Human Activities* ____ *Natural Forces* ____
Category or Categories (from revised list) _____
Specific Causality (from revised list) _____
Treat/disturbance/*none*: _____
Ftr/Area: _____
Comments (add comments field so recorder can elaborate) _____

- ❖ **If possible, change the ASMIS fields for annual reporting to ensure clarity.** Currently the ASMIS variables for visitation as detailed on Page 7 are limited to “visitor use/visitation-general” and “use by hikers or horses”. Aren’t hikers considered visitors? The NPS might consider changing those categories to river and non-river visitation (and possibly “visitation – unknown source”), so it is abundantly clear which visitation impacts are river-related.
- ❖ **Under “National Register Evaluation” on the Monitoring Form, NPS should consider:**

- 1) Instructions should be as specific and clear as possible to reduce recorder error.
- 2) Add a comments section for elaboration.
- 3) The site value list should show **A** through **E** (not A through D – the last value is not lettered).

- ❖ **Corresponding to the National Register Evaluation section of the monitoring form, page 19 of the variables (National Register Section) should include E (Significant for the continuity of traditional cultural practices) and its definition.**
- ❖ **When assessing wildland fire hazards, NPS should consider that the potential exists for fuel reduction to actually threaten or disturb an archaeological site.** Possible situations could include 1) exacerbation of erosion, 2) increased visitation because of heightened site visibility. Wildland Fire Assessment must balance benefits against possible detriments. The monitoring form does not allow for this type of discernment.

OBJECTIVITY

Considering that historic properties at the heart of this Plan are *non-renewable resources*, their continued protection and preservation is *critical* not only on a site-by-site basis but also for the larger understanding of cultural values and cultural/historical context. Therefore, GCRG recommends:

- ❖ **Devising a mechanism for independent review and evaluation** to reinforce and validate NPS management actions thereby ensuring that these sites will retain their National Register eligibility now and in the future.

TRANSPARENCY, ACCOUNTABILITY, & INFORMATION SHARING

GCRG is pleased to see that annual reporting is a requirement and that stakeholder presentations and information sharing will be encouraged. However, we suggest:

- ❖ **Strengthen this Plan by establishing a *true commitment to regular information sharing and coordination between the CRMP and other programs, including non-NPS programs of direct relevance.*** Data sharing is not only critical between multiple CRMP-related activities, but also with the various non-NPS programs to eliminate redundancy while strengthening *all* programs. Towards that end, we suggest that the NPS not only specify that you *will* coordinate *regularly* with these other related efforts (both NPS and non-NPS), but also explain specifically *how* that interface will be accomplished.

Thank you for the opportunity to comment on the Historic Properties Monitoring and Management Plan. Grand Canyon River Guides is eager help in any way that might further NPS goals, as we share your stewardship mission.

Sincerely,

Lynn Hamilton

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