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March 8, 2007

Linda Jalbert  
Grand Canyon National Park  
PO Box 129  
Grand Canyon, AZ 86023-0129

Dear Linda,

Grand Canyon River Guides appreciates the opportunity to provide comments to Grand Canyon National Park on the Draft Visitor Experience Monitoring Plan (VEMP) as that plan directly relates to two of our primary goals: *to protect Grand Canyon and provide the best possible river experience.*

Grand Canyon River Guides' suggestions and comments for the VEMP are as follows:

**Provide details on integration/information-sharing with other monitoring efforts and programs:**

Obviously the development of the VEMP, and the data gleaned from that effort, will affect (and should inform) other monitoring efforts and program. Conversely, data from these other programs should integrate into the VEMP as well, including:

- 1) The GCNP Cultural/Natural Resources monitoring plan
- 2) The Cultural Programmatic Agreement of the GCDAMP
- 3) Grand Canyon River Guides' Adopt-a-Beach program (the 2006 datasheets included campsite carrying capacity questions)
- 4) The GIS/Atlas Campsite Monitoring plan through Grand Canyon Monitoring and Research Center
- 5) The Adaptive Management Program for Glen Canyon Dam, Recreation Protocol Evaluation Panel (Recreation PEP)
- 6) The Long Term Experimental Plan for Glen Canyon Dam.

It is insufficient to say that there will be integration – *details should be provided to show how that information will flow back and forth between those programs in order to eliminate*

*redundancies, while maximizing the understanding of the recreational experience and ensuring its protection for future generations to enjoy.* Considering that GCNP resources are limited, it is particularly incumbent upon the park to take advantage of parallel efforts such as those through GCMRC or the Glen Canyon Dam Adaptive Management Program. Additionally, impacts from the dam have continual and long term impacts on downstream resources including the visitor experience. The Long Term Experimental Plan, for example, may have profound impacts on dam flows (and therefore beach conditions that impact the recreational experience) for years to come.

### **Define recreational values being “managed for”**

Although the standards for the VEMP can be found in the Colorado River Management Plan, the VEMP itself must closely define the recreational values it is managing for. These should include not only the values mentioned in the 2006 NPS Management Policies, but also the less tangible qualities such as the sense of freedom, the ability to explore, opportunities to experience solitude, and the perception of “naturalness” of the river corridor. The vision statement adopted from the General Management Plan (and revised based on public scoping sessions and comments during the CRMP process) incorporates the following elements:

- 1) Management designed to provide a wilderness river experience, and
- 2) Protecting and preserving the Colorado River corridor in a wild and primitive condition.

These recreational “values” are necessary for the integrity of the wilderness experience. Clearly defined standards, triggers, and values within the VEMP itself will elucidate how the park will reconcile two different and potentially conflicting objectives:

- Increasing public access from the CRMP.
- Ensuring that park resources are protected and opportunities for quality visitor experiences are provided within the context of the park mission: “... *when there is a conflict between use and preservation, the protection of resources will be predominant.*” (2006 NPS Management Policies).

### **Consider the use of on-site observers rather than log books in ammo cans**

The pilot study that GCRG conducted in Fall of 2006 using ammo cans and surveys at selected attraction sites met with considerable resistance from the guide community. Comments from river guides about the use of ammo cans were almost uniformly negative. Therefore, opting for methods that are less of a “man-made intrusion” would be preferable. That being said, GCRG remains committed to helping Grand Canyon National Park in whatever capacity may be most productive.

### **The VEMP should ensure transparency/accountability**

Not only should the standards and values be clarified in the VEMP itself, but the “deliverables” should also be specified in order to ensure accountability to the public at large. The VEMP meeting in February 2007 alluded to some of these deliverables, but they should be specified in the document itself as well as the mechanism by which Grand Canyon National Park will disseminate those deliverables to the public. The articulation of standards and values and the analysis of the data as it relates to the preservation of those standards and values should provide

accountability and compliance beyond the CRMP itself. Again, we request accountability to the “public at large”. If for example, the annual use information is only available as part of the on-line launch calendar, it would prohibit other stakeholders or interested parties from accessing the information since the OLC is proprietary.

**Funding must be ensured beyond the first five years**

Essential funding is a critical component for the protection and preservation of the visitor experience. Traditionally, monitoring programs are often the first to get cut when budgets are tight, but they are absolutely necessary in order to provide a defensible basis for future management actions. We applaud the park for garnering sufficient funds for the first five years of the plan, but the plan should also state what will happen if sufficient funds do not materialize thereafter, including prioritization of efforts.

**The VEMP should provide a detailed plan for the data.**

The Draft VEMP is very general, lacking details of how the data will be analyzed. How will the statistical analyses be conducted? What graphs will be used? The VEMP discusses monitoring methods, but should go a step further by clearly delineating the plan for the data itself.

**The VEMP should make reference to the “adaptive management” concept incorporated in the CRMP, coupled with stakeholder communication.**

At the February VEMP meeting, the park indicated that it will take an adaptive management approach to the monitoring results if that data indicates that a change is needed, yet the plan does not reference that concept, nor the commitment to start with the least intrusive and most reasonable mitigation measures (such as education), before escalating as necessary for forestall impairment. Consultation with stakeholders should occur when “triggers” are reached that may result in potential changes in management actions. Regular stakeholder contact and communication will help ease any transitions while positively address stakeholder concerns about those actions and potentially enlisting their assistance in addressing those problems.

**Determining which SAR incidents are river-related (and what type – private, commercial, administrative, etc...) as opposed to private hikers, is crucial to the understanding canyon district incidents.**

The specificity of data as it relates to SAR incidents is particularly relevant to the new requirement for guide-accompanied hiking exchanges. New fields must be added to the SAR database where necessary in order to incorporate this information going forward. If the park cannot easily discern which incidents are river related, the commercial outfitters should have that information for their sector from years of detailed trip reports. Again, if the data proves that there was “no problem to fix”, the park should be willing to adaptively change or even remove the unnecessary regulation.

**The “calendar” portion of the on-line launch calendar (OLC) should be available to the public.**

Education should always be the first line of defense, and knowledge of launches at any given point in time should be available to the public before they get to Lees Ferry. Access to this information can only help on-river communication with the potential to alleviate crowding and

congestion. There should be a way to make this portion of what is now a proprietary system, open and understandable to the public.

**Keep the public informed with regular updates and information on VEMP plans**

Obviously, the VEMP will “evolve” as monitoring needs are discerned and methods refined. It behooves the park to provide regular updates about monitoring activities/plans in addition to the annual reports and deliverables you will be producing. Utilizing a variety of public outreach vehicles can help to build understanding and tolerance of monitoring activities and help ensure the “buy in” from the river running public that is necessary for program success. These might include (but are not limited to):

- The CRMP website
- The *Boatman’s Quarterly Review*
- Grand Canyon River Guides’ guide email lists
- The commercial river outfitters
- Grand Canyon Private Boaters Association’s listserv & their publication
- The Grand Canyon River Runner’s Association (GCRRA) publication
- Native American tribes

GCRG is encouraged by Grand Canyon National Park’s efforts to ensure scientific credibility through the formal agreement with social scientists Bo Shelby and Doug Whittaker from the University of Oregon. Their involvement should provide continuity and consistency for this monitoring effort, as well as outside objectivity and expertise. We are also encouraged by the stakeholder outreach associated with this new endeavor, but as we have stressed before, that outreach must continue throughout the life of the CRMP. As our early pilot monitoring effort clearly showed last fall, failing to sufficiently inform and educate the public of monitoring efforts (and the need for them) prior to their occurrence can easily undermine well-meaning efforts.

Grand Canyon River Guides’ deep desire to preserve the river experience is tied to the realization that a trip through Grand Canyon can be life altering and the advocacy that stems from that experience can be life-long as well, but only if the unique quality of that experience is carefully preserved. We therefore offer our assistance to you and our full support to make this program as productive and successful as possible as we move forward.

Sincerely,

The Officers and Board of Directors  
Grand Canyon River Guides, Inc.

