

Background Information for Comments to the National Park Service on the Draft Environmental Impact Statement for the Colorado River Management Plan (CRMP)

The National Park Service (NPS) is asking for comments on the Draft Environmental Impact Statement (DEIS) for the Colorado River Management Plan (CRMP). The comment period represents an important opportunity to let the Park Service know how you feel about wilderness management and protection of the special ecological, cultural and recreation resources at the heart of Grand Canyon National Park.

It is important to be as specific as possible in your comments relating to issues addressed, analysis conducted or management directions proposed in the DEIS. If you can reference page numbers or sections of the document, it will help ensure that the Park Service understands your comments. Personal experiences in relation to the issues addressed in the DEIS are valuable. Be sure to include comments on any issues you feel were left out or not adequately addressed.

It is the Park Service's obligation under the law to interpret and address the issues you raise. While helpful, citing page numbers and specific sections of the DEIS are not required to submit substantive comments.

Wilderness and the Use of Motors:

The DEIS makes it clear that wilderness character must be protected on the Colorado River corridor through Grand Canyon National Park and that motorized vehicles are incompatible with this purpose.

“In 1980 over 90% of Grand Canyon National Park was recommended for designation as wilderness, and the Colorado River corridor was recommended as potential wilderness pending the removal of motorboats as a use that is incompatible with wilderness values” (DEIS, page 6).

The guiding principles for revising the Colorado River Management Plan include the following: “Until the Secretary of the Interior, the President, and Congress act on the Grand Canyon *Wilderness Recommendation*, this section of the Colorado River will be managed as potential wilderness according to NPS *Management Policies* and the Grand Canyon *Wilderness Recommendation*, as updated in 1993” (DEIS, page 6).

The CRMP vision for the river corridor is based on the vision in the 1995 *General Management* plan. “The Colorado River corridor in Grand Canyon National Park will be managed to provide a wilderness river experience in which visitors can intimately relate to the majesty of the Grand Canyon and its natural and cultural resources.... The Colorado River corridor will be protected and preserved in a wild and primitive condition” (DEIS, page 11).

Motors on the river are incompatible with wilderness values and experience. Non-motorized boats provide a safe, wonderful experience for river travelers with a wide range of needs and desires. We support phasing out motors and helicopter exchanges to restore and protect wilderness character.

Visitor Use Levels:

Carrying capacity is the issue central to all alternatives and drives a significant portion of the effects analysis. The primary factors that determine carrying capacity on the Colorado River (for the Lees Ferry Alternatives) are:

- number, size, distribution and expected life span of camping beaches
- number, types and condition of natural and cultural resources

- contacts per day (on river attraction site encounters), campsite competition, number of trips at one time (TAOT), number of people at one time (PAOT), group size, trip length, and launch patterns.

All three primary factors indicate that a reduction in visitor numbers, launches per day and group sizes is called for in establishing and implementing a sustainable carrying capacity for recreation in the Grand Canyon Colorado River Corridor. The Park Service must not delay a decision for another 10-15 years to adjust visitor numbers downward.

Group Size:

On Page 226, the DEIS notes that campsites able to accommodate the space needs of large groups are diminishing in size and number and are not distributed evenly throughout the canyon. As a result, larger groups spread into the old high-water zone, impacting natural and cultural resources that otherwise would be relatively undisturbed. Group size also impacts wilderness experience for visitors. Group Sizes should be reduced to protect natural and cultural resources and enhance trip quality.

“In its *Management Policies 2001*, the National Park Service recognizes that resource conservation takes precedence over visitor recreation. Section 1.4.3 states ‘when there is a conflict between conserving resources and values and providing for enjoyment of them, the National Park Service seeks to avoid or to minimize adverse impacts on park resources and values’” (DEIS, page 8).

The Number of Launches Per Day:

The DEIS acknowledges in Appendix G that a smaller numbers of daily launches will reduce encounters between river trips and increase passenger enjoyment. Fewer daily launches will decrease crowding, reduce impacts to beaches that are exacerbated by increased competition for campsites, and enhance wilderness experience. Alternative B limits maximum daily launch numbers to 4 in summer, 2 in the shoulder seasons and 1 in winter. The Park’s preferred Alternative, H, allows up to 6 launches in the summer, 3 in the shoulder season and 1 in winter (DEIS, Table 2-2, page 36).

Trip Length:

The DEIS acknowledges in its Alternative B analysis that lower visitor numbers can allow visitors to enjoy longer trip lengths and more discretionary time on the river without increased impacts to natural and cultural values. Trip lengths are reduced from the current number of days in all alternatives.

The Park Service should clearly relate trip length reduction to resource protection objectives and explain why trip lengths are shorter under Alternative B, with the lowest overall numbers of users, than under Alternative H, which retains motors and increases annual numbers to over 26,000 people.

Allocation of Permits and Commercial vs. Non Commercial Access:

Under all alternatives, the majority of trips are allocated to commercial river concessionaires, even though the wait for a noncommercial private trip permit can be up to 20 years. The Park Service is legally mandated to limit commercial services to those that are necessary and appropriate. An analysis of what type and amount of commercial services are “necessary and appropriate” should be included in the DEIS to inform the Park Service’s decision about how or whether to allocate trips between commercial and private boaters.

The Park Service does have an obligation to provide opportunities for commercially assisted river trips to persons without the knowledge, skill, and/or equipment to run the river on their own, however, the current NPS allocation of recreational use on the river is not based on any scientific study or other valid indicators of public demand or need.

Protection of Natural Resources:

NPS is required to prioritize resource protection above all other values, including recreation. The National Park Service Organic Act of 1916 directs the Department of the Interior and the National Park Service to manage units of the national park system “to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (16 U.S.C. 1).

Because of this priority, it is inappropriate for the Park Service to weight providing a variety of trip type opportunities and exchange options, meaning motorized trips and helicopter exchanges, equally with the preservation of natural and cultural values. Yet it seems that the Park Service *has* chosen to weight these values equally in choosing its preferred alternative (DEIS, Table 2-9, page 89-90).

Beaches:

According to the DEIS, the size, number and distribution of beaches used as campsites limit the river’s recreational carrying capacity. Pages 233 and 419 of the DEIS establish and discuss the relationship between beach size and vegetation loss due to human impacts. “As beach size is diminished, impacts to soil and vegetation increase in the old high-water zone.” As beaches disappear, human impacts grow.

While the dramatic decline in the size and number of beaches is primarily due to Glen Canyon Dam, the Park Service is obligated to address the impacts it can control by establishing visitation levels and use patterns that will protect the river’s disappearing beaches.

Soils:

On page 231, the DEIS acknowledges that the soils in the new high water zone erode easily and regenerate very slowly and that beaches are highly susceptible to erosion during hot dry months when most of the visitation occurs. The Park Service also notes that even though current regulations prohibit camping in the old high water zone numerous violations occur (DEIS, page 239).

Vegetation:

The DEIS states that the variables within the alternatives that have the greatest potential to impact vegetation are group size, trip length, user discretionary time, launch schedule (including seasonal use levels), user-days and the total number of yearly passengers.

“Although camping is prohibited in most of the old high water zone, campsite expansion into this area and the associated loss of vegetation has been exacerbated by the ongoing reduction in the size of camping beaches due to river erosion and plant encroachment” (DEIS, page 410).

The DEIS states on page 422 of Alternative B that “Total user-days and yearly passengers would be at their lowest under this alternative, resulting in the lowest level of potential impacts to vegetation from visitor use impacts and the spread of invasive exotic species.” Given the limited ability of dwindling beaches to support the river corridor’s vegetation, this is important support for Alternative B.

Terrestrial Wildlife:

Pages 448 thru 453 of the DEIS acknowledge that current use patterns and river recreation at the present level would result in adverse, long term impacts to small mammals, bats and birds. The DEIS particularly notes the effects of increased use in the spring. “Impacts could occur year-round, but wildlife resources would be most sensitive during the spring and summer when mating (spawning), birthing and hatching occur” (DEIS, page 445).

Helicopter exchanges have negative impacts to terrestrial wildlife species, including bighorn sheep.

“While bighorn sheep can become habituated to some types of repeated human disturbance, researchers found that they do not habituate or become desensitized to repeated helicopters flights” (DEIS, page 451).

“As beaches erode, river recreationists are forced into vegetated areas to accommodate camping needs, resulting in additional wildlife habitat degradation” (DEIS, page 446).

Threatened, Endangered and Sensitive Species:

According to Table 4-22 on page 516, the effects for most species are Moderate to Major for all alternatives. Moderate is defined as: “Impacts to sensitive species would be perceptible or measurable, and the severity and timing of changes to parameter measurements are expected to be sometimes outside natural variability, and changes within natural variability might be long term.”

Major is defined as: “Impacts to sensitive species would be measurable, and the severity and timing of changes to parameter measurements are expected to be outside natural variability for long periods of time or even be permanent; changes within natural variability might be long term or permanent. Populations of sensitive species might have large declines, with population numbers significantly depressed. ... A major effect would equate with an ‘adversely affect with/without a jeopardy opinion under section 7 of the Endangered Species Act regulations” (DEIS, pages 513-514).

This gives rise to serious concerns about the river corridor’s threatened, endangered and sensitive species, yet the Park Service’s preference, Alternative H, is expected to have a major impact on six threatened, endangered or sensitive species. Alternative B is expected to have a major impact for only one species. While page 514 offers “reasonable mitigations to consider,” these are not yet a part of any alternative and should be included in the analysis of alternatives.

Protection of Cultural Resources:

The cultural resources along the Colorado River through Grand Canyon are many and significant and represent more than 12,000 years of human history in the area. All of these sites are important because of the information they provide about our history and about the traditions of native peoples.

Protections for cultural and natural resources are key issues in this plan. Many of the actions that benefit natural resources will also help to protect cultural resources. Limiting the number of visitors and the size of the groups will help to protect all of these resources. According to the DEIS, “When larger groups visit cultural resources, they have greater potential to inadvertently disturb features, artifacts, and traditional cultural areas by their inability to stay on established trails, which are created for single-file movement. Congestion in resource areas can lead to unintentional trampling of important cultural features” (DEIS, page 540).

The total number of passengers and user days in the summer will decrease under Alternative B. According to the DEIS, “This along with the reductions in group size, trip length, number of trips and people at one time, as well as the elimination of Whitmore exchanges, would reduce crowding, thus decreasing the incidence of unintentional impacts at camping and attraction sites” (DEIS, page 552).

For the Lower Gorge Alternatives, Alternative 2 will provide significant protection for cultural resources. According to the DEIS, “For all cultural resources, impacts would be adverse, localized, long term, year-round, and negligible to moderate. Management objectives would be met (with reasonable mitigation) due to implementation of regulated use and reduction in trip length” (DEIS, page xviii).

The effects of both Alternative B for the Lees Ferry Alternatives and Alternative 2 for the Lower Gorge Alternatives should be minimized by mitigating them via the measures outlined on Page 545 of the DEIS.

Natural Quiet

The Park Service is mandated to restore natural quiet, an important and increasingly rare back country resource, yet Alternative H allows up to 1,000 helicopter rides in and out of the river corridor each year and continues the use of motorized rafts and boats. The DEIS recognizes this inconsistency on page 166:

“Some elements of Grand Canyon river trips may seem to contradict a ‘primitive’ label, including motorized boating use during most of the year, the use of helicopters at Whitmore, the use of helicopter or motorized boats for rescues and research, large group sizes (up to 44 people) on some commercial trips, and crowding or congestion at launches, takeouts, and some attractions.”

The DEIS states that its vision is of a “wilderness experience.” It states that “Areas recommended or eligible for wilderness designation, including the Colorado River, ‘offer visitors opportunities for solitude and primitive recreation. The management of these areas should preserve the wilderness values and character.’ ” The DEIS goes on to state that “Components of a ‘wilderness river experience’ include: The natural sounds, silence, smells, and sights of the canyon, and the river predominate over those that are human-caused” (DEIS, page 11).

The cumulative effect of general human background sounds, aircraft noise, and the often continuous drone of the boat motors adds up to an unnatural experience that falls short of the contemplative recreation experience that would be more possible without the motors. The DEIS makes numerous statements that reveal the incompatibility of motorboats and helicopters with the restoration and preservation of natural quiet:

- “Natural soundscape is affected primarily by motorboat and helicopter use” (DEIS, p. 88).
- “Natural sounds are considered an inherent component of the scenery” (DEIS, p. 127).
- “Natural sound is vital to the visitor experience at the park and can provide valuable indicators of the health and ‘naturalness’ of the ecosystem found there” (DEIS, p. 127).
- “Grand Canyon’s natural soundscape is considered a disappearing resource that requires restoration, protection, and preservation” (DEIS, p. 128).
- “Helicopter shuttles in the Whitmore area create major adverse impacts in an area up to 10-20 miles in diameter around the Whitmore landing site (i.e., localized)” (DEIS, p. 347).

Range of Alternatives:

Ask the Park Service to select Alternative B with improvements. The DEIS shows that Alternative B is best for protecting the river’s wilderness character and other resources. This alternative is characterized by no motors, the smallest group sizes, lowest number of maximum daily launches, highest average per person discretionary time, substantially fewer probable yearly passengers and no helicopter exchanges at Whitmore.

Humans, plants and animals are all competing for the same dwindling resources in the Grand Canyon river corridor. The Park Service will not be able to avoid resource impacts from increasing overall user numbers simply by spreading out trips into the spring and fall and reducing trip sizes.

Recommended improvements to Alternative B:

- While the DEIS shows that a reduction in visitor numbers will decrease resource impacts, it does not clearly justify the specific reduction of visitor numbers by almost half in Alternative B. The DEIS should clearly relate specific numbers to resource impacts.
- Alternative B could allow passenger exchanges by hiking or mules rather than abolishing them altogether with the elimination of helicopters.
- Alternative B splits commercial and private use more equitably than any other alternative, 69-31 percent, but still does not resolve the problem of fair and equal access.

- The Park Service should look at altering use patterns and implementing the mitigation measures outlined in the DEIS to reduce the effects of spring use on soils, vegetation and wildlife.
- As with overall numbers, the Park Service needs to clearly relate trip length reduction to resource protection objectives, especially because it is not clear why trip lengths are shorter under Alternative B, which also has the lowest overall numbers of users, than under Alternative H, which retains motors and increases annual users to over 26,000 people.

Lower Gorge Management Recommendations and Alternatives

A difficulty with dividing the river into the above-Diamond Creek section and the below-Diamond Creek section is that each section is treated separately. However, the need to achieve the “widest range of appropriate river experiences” can be accommodated by realizing that the lower section will provide opportunities for motorized trips while the upper river section can be designated for no motors. Thus, both types of recreation can be achieved while not allowing motors on the upper section.

The variety of experience provided by differences in management between the lower and upper sections of the river is clear in the following statements from the DEIS:

“Types and level of recreational use in the Lower Gorge below the confluence of Diamond Creek vary greatly from those above RM 225. The primitive zone that starts at Lees Ferry (Zone 1) ends at Diamond Creek. From RM 225 to RM 260 the zone is a transitional one, changing from primitive to semi-primitive. From RM 260 to RM 277 the setting is rural natural, and below RM 277 the setting becomes urban on Lake Mead. Visitors to the Lower Gorge experience an increase in motorized use from upriver travel from Lake Mead, pontoon boat excursions, and helicopter tours and shuttles in the Quartermaster area (RM 259–RM 262)” (DEIS, page 108).

“Encounters with other groups and congestion are at their highest levels in the Lower Gorge; for instance, group sizes are higher and pontoon trips can be encountered on both their upriver and downriver course” (DEIS, page 65).

In spite of different zoning, the DEIS recognizes that carrying capacity and impacts to resources are of concern in the Lower Gorge. The standards used in calculating carrying capacity are the same as those listed for the Lees Ferry Zone listed on page 2 of this form. The zones below Diamond Creek are characterized as semi-primitive, recognizing higher use and a greater variety of activities. The size and capacity of camping beaches in the Lower Gorge is diminishing due to erosion, and vegetation encroachment by exotic plant species accounts for much of the loss of areas suitable for camping. Group size affects park resources because larger groups need more space at lunch, camping, and attraction sites” (DEIS, page 66).

“The greatest current effect to water resources from HRR day trips use is from impacts such as increases in turbidity and contaminants caused by large groups” (DEIS, page 288).

Table 2-7 on page 81 shows that Alternative 2 has fewer adverse impacts to air quality, vegetation and aquatic resources than the other lower gorge alternatives. We support decreased group sizes, fewer daily launches and the implementation of daily passenger limits launching from Diamond Creek as well as reduced allowable upriver travel. Pontoon boat operations and associated facilities as should be eliminated in the Quartermaster Area and jet skis should be eliminated from the lower gorge. These operations and facilities constitute a substantial environmental contamination risk (DEIS, page 287).

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