

Adaptive Management Considerations Colorado River Management Plan

Recommendations and Discussion Topics

Grand Canyon Private Boaters Association
August 6, 2014

Grand Canyon Private Boaters Association (GCPBA) is a non-profit organization dedicated to advocacy on issues surrounding private boater access to the Colorado River through Grand Canyon National Park. Founded in 1996, GCPBA represents a paid membership as well as a long-established internet-based river community. Our organization was an active participant in the formulation of the 2006 Colorado River Management Plan (CRMP), and was a legal party supporting the Park in court challenges against the CRMP from 2006 to 2010.

Because of GCPBA's investment in the CRMP, we have closely followed its implementation, and since its enactment have worked with Park officials to track its operation and effectiveness. We have been, and continue to be, impressed with the manner in which the Plan has been carried out. In our view, its success to date is a result of not only insightful development, but also diligence and professionalism on the part of numerous staff responsible for its implementation. We compliment the many Park personnel who have made this possible.

Early in the CRMP's life, it seemed premature to advocate strongly for any major changes. Now, in its seventh year of operation, we believe some of those key concerns warrant formal discussion. To that end, GCPBA has been tracking emerging items of interest or concern on the part of our members and constituents. More recently, we solicited CRMP-related input from members, as well as constituent groups represented in several internet forums. This document represents our synthesis of that ongoing and current informational flow.

What follows is a brief description of two recommended CRMP changes and six discussion topics, which could lead to adaptive management changes in the Plan. We present them first in abbreviated form, and then include more detailed supporting information in the Appendix, which is the GCPBA working paper that resulted from this ongoing information-gathering project.

The goal of those changes and discussion items would be to allow future river operations to more closely and completely realize the CRMP's goals with respect to private boaters. Also, none of these items should be viewed as GCPBA seeking to infringe on, or influence in any way, the commercial component of Grand Canyon boating. If any unforeseen commercial impacts flow from these ideas, we are ready to discuss how to achieve our stated goals in a manner that eliminates those impacts.

GCPBA appreciates the opportunity to present this information, and is prepared to work with the Park to more fully develop these concepts.

Specific CRMP-Related Recommendations and Discussion Topics

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Recommendations

R-1. Expedite reallocation of unclaimed and abandoned launch dates. This would be done by announcing information regarding those dates immediately upon availability, so that boaters can begin exploratory planning before lotteries are actually conducted. In this connection, more frequent secondary lotteries should be considered for unclaimed launch dates. (See Appendix item #2)

R-2. Increase maximum trip lengths for selected portions of the boating season. Under this revision, winter trip lengths would be restored to 30 days. (See Appendix item #6)

Discussion Topics

D-1. Consider changes in the One Trip a Year rule, to include: waiving it completely; waiving it just for the winter months; or, waiving it only for trips that are unassigned within 30 days of launch. (See Appendix item #1)

D-2. Consider changing how lottery chances are awarded, to develop a new system in which everyone would start with one point. In such a system, additional chances would be awarded only for a failed lottery application (and no trip participation) each year. Under this provision, the lottery chances of the applicant and PATL could be added. (See Appendix item #3, 4)

D-3. Consider increasing trip sizes, such that up to 24 participants would be allowed for winter and shoulder season launches. (See Appendix item #5)

D-4. Consider rescheduling unused launches in a manner that recovers lapsed launches later in the same year. (See Appendix item #8)

D-5. Consider revision of the small trip launch schedule. This idea would entail a reduction in the number of winter launches, which would be replaced by a corresponding number of additional launches in March and October. (See Appendix item #9)

D-6. Consider increasing the maximum trip length for a noncommercial standard river trip launched in the period Sept 1-15 from 18 days to 21. (Appendix item #7)

Appendix

GCPBA Adaptive Management Workgroup Paper August 2014

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- 1.) Relax the One Trip A Year rule for winter trips.
- 2.) Post trip cancellations immediately.
- 3.) Lottery Changes.
- 4.) Encourage Potential Alternate Trip Leaders.
- 5.) Increase trip sizes.
- 6.) Winter trip length.
- 7.) April & September trip lengths.
- 8.) Reschedule all unused trips.
- 9.) Add small trips to the March and October launch calendars.

General Approach

The goal of this project is not to rewrite the 2006 CRMP, but to identify options for adaptively managing it, so that noncommercial river runners can make the best use of the launches allocated to them by the CRMP. To that end, we want to work with the Park to more fully develop the concepts contained in this paper. We greatly appreciate the opportunity to present this information for the Park's consideration.

Noncommercial river access gains were necessary for a long time, ever since river usage was first allocated in the early 1970's, to the 1989 Colorado River Management Plan, and then finally achieved with the new 2006 CRMP. We request that the Park do all it can to adaptively manage the CRMP so that noncommercial river runners can best utilize all of their launch opportunities, and secondarily potential user days, as allowed in the CRMP.

From page 31 of the CRMP: "Adaptive management provides systematic feedback to park management and allows activity adjustment to mitigate unplanned or undesirable plan implementation outcomes." It is time for this to happen.

In the sections that follow, we will raise ideas that the Park may consider in order to adapt the CRMP, so that noncommercial river trips will launch on dates that they will most likely be used. Insofar as we can determine, all of the noncommercial river launches will stay within the CRMP's parameters of Trips and People At One Time limits.

For example, we recognize that cancellations of trips can happen at anytime, from more than a year in advance of a launch date to a group not showing up at the launch ramp on their appointed day. We believe the following requests for adaptive management will help noncommercial river runners better utilize all of the river access granted to them in the 2006 CRMP.

We find in the CRMP that both launches and user days are important. Page 4 of the CRMP states, "...recreational use...is accomplished by establishing daily and seasonal launch limits for the various types

of commercial and noncommercial trips...User-day limits are not applied to noncommercial trips." From page 206 of the CRMP Final Environmental Impact Statement: "Data for the main canyon can be used to characterize use levels...(although the upper canyon focus is on user-days rather than trips or passengers)."

The GCPBA would like the Park to consider for its adaptive management the flexibility to deal with the changing needs of the private boater as illustrated by the data that has been generated over the past six years.

Private boaters are showing an increasing interest in trips with far fewer group members than the maximum allowed. This presents a challenge to adapt to this use without depriving others of the much sought experience to boat through the Canyon.

For example, winter usage figures for 2012 highlight two of the difficulties that we feel should be addressed by easing some of the restrictions on private launches. What is an unopposed season for private access is showing a growing number of unused launches, with many available launches going unused.

More telling is the story illustrated by the user day statistics that show private trips are leaving 39% of the Park's projected winter user days unused -- more than thirteen times the amount of the shoulder season. This is hardly surprising, since a wilderness experience is sought out by those looking for the freedom to travel with whom and in a manner that they wish. We bring this up in order to show that there should be room to ease some of the restrictions that CRMP had thought necessary in 2006.

In summation, what we at the GCPBA feel obliged to pursue for the boating public is the flexibility in the structure of a long awaited noncommercial launch schedule to accommodate the varied needs of the private boater.

We have no wish to degrade our resource and we give credence to the benefits of the PAOT and TAOT parameters. We also do not wish to overtax the Park's ability to maintain the launch schedule as well as they have.

We believe this paper presents ideas for consideration that might reasonably be put in place within the current CRMP parameters, and still extend public access to all of the noncommercial launches allocated by the 2006 CRMP.

1. (D-1) Waive the One Trip a Year (OTAY) rule so that any person may participate in a noncommercial river trip as a permit holder or a passenger and not have that trip count as their one trip allowed for that year. This can be after a trip has been claimed and subsequently canceled, or if it was never claimed at all after two lotteries had been conducted.

This rule was instituted under the 2006 CRMP, presumably so that no one would have a second river trip during a year while someone else was waiting for his opportunity to have his first.

The OTAY rule might be effective to a small degree in assuring open slots on noncommercial river trips go to participants who have not participated in a trip in a current calendar year. If it is a concern that too many people would be participating in a second river trip during a year, we note that by NPS statistics less than one-half of one percent of noncommercial users took more than one trip per year (DEIS Vol. 2, p. 657).

Furthermore, we believe this modification should be considered from a safety perspective. As we wrote in our comments to the Park in 2005, in response to the DEIS, experience is a highly regarded asset for noncommercial river runners, especially for those who are new to the Grand Canyon. Limiting repeat use has the effect of reducing Grand Canyon river running knowledge that trip organizers have available to them. This knowledge could be critical, especially during a winter trip.

As an alternative, consider waiving the OTAY rule for any Grand Canyon river runner who wants to participate in a winter season trip, one that launches from November 1 through February 28.

The OTAY rule may be discouraging people from going on a winter trip in the hope that they will later find a slot on a warmer season trip as their only trip allowed during a year. Thus, many winter trip opportunities for noncommercial river runners go unused.

The Grand Canyon River Office reports the number of recent unused winter launches as 25 in 2009, 14 in 2010, 23 in 2011, 18 in 2012, and 11 (est.) in 2013. With this many river trip launches unused, 18 per year on average, there is no evidence that a person participating in a winter season trip is taking away an opportunity for another to have his only trip during a year.

We believe that winter season trips always should be available for all river runners, and that modifying the OTAY rule would allow for more winter trips. Anyone should be allowed to participate in a winter trip, be they first time river runners during their only trip of a year or people that wanted two river trips during that year.

Our mutual goal has been to utilize as many noncommercial launches during a year as allocated. Waiving the OTAY rule for the winter season would be helpful in awarding launches that would otherwise go unused.

Regarding the effect of more winter river trips, presume that nine more winter trips per year would launch than have done so in the past five years (half of the 18 winter trips per year not launching). Presume, also, that each trip was ten people for nineteen days (five year averages, again). That means 1,710 additional user days during winter.

Adding 1,710 user days to the recent average of winter user days, 19,962, leaves it still far below the projected usage of 34,087 winter user days.

Modification of the OTAY rule has been discussed since 2010. We seek further discussion of this modification.

2. (R-1) We recommend that the Park make information available more quickly regarding unclaimed and cancelled noncommercial launch dates, and conduct more frequent secondary lotteries for those dates.

Cancelled noncommercial river trips are disappointing, not only for the permit holder and participants, but for the River Office as well. It is imperative to note that these cancellations represent an opportunity for others. People hoping for a river permit should be informed as early as possible of a launch date becoming available.

We believe that if information about unclaimed launch dates were available to noncommercial river runners as early as possible, they will be able to make better a decision whether or not to enter a lottery for one or more of those dates.

We propose that the River Permits Office maintain a website of unclaimed launch dates for the current and upcoming years. It should be updated immediately upon receiving notice of a claimed date that later became available via cancellation.

Furthermore, when a launch date becomes available it should be offered in a secondary lottery as early as possible, such as a lottery to begin the next Tuesday and end on Thursday.

These changes would allow potential lottery applicants and their groups to discuss and plan in advance of a lottery, deciding if an available date is one that they would want and intend to keep, should it be won by a member of that group. They will have more time to secure needed time off work, other participants, and plan the gear, food, and other necessities for the river trip.

Lotteries certainly take some time and effort to organize, but not as much time as an eventual winner of a date needs to make the trip happen. The more time the permit holder and trip leader have, the better. Also, with more time to prepare for a trip, more people might apply for that trip.

Lastly, page 14 of the CRMP states: "Permits that continue to be unclaimed through the lottery 30 days before the launch date may be awarded on a first-apply, first-served basis." We note that this CRMP provision could be implemented immediately. Launch dates that are available for any reason with less than 30 days to launch should be available to a first caller either on a pre-announced date, or immediately after the Park receives the cancellation notice, especially if the date is in the winter season.

3. (D-2) Consider changing the method for determining how many lottery chances an applicant for a noncommercial river trip permit will have in the lotteries.

In the current lottery system any applicant who has never been on a river trip and has never applied for a noncommercial river trip permit is immediately awarded five chances, or points, in a lottery. This seems to serve no purpose other than to favor those people that have not been on a river trip in the last five years.

We support the statement on page 19 of the CRMP Record of Decision: "(one of the objectives of the new permit system is to) favor those who have been unsuccessful in obtaining permits in previous years."

One might at least ask whether someone who has never gone on a river trip and decided to begin applying for a river permit, should have a lottery advantage over someone else who has been applying, losing, and not going on a river trip. It seems unfair to those people that have been applying for a permit for years and have neither won a permit nor participated in a trip. People that have never before applied for a permit should not be in a superior lottery position.

Therefore, in the interest of fairness, we would like to discuss all new lottery applicants starting the lottery process with one point.

This would also have the effect of negating a gaming opportunity in the current lottery system. People with few lottery chances would not be able to recruit someone else to put in an application, just because that person had never been on a river trip and so had five chances.

Furthermore, regarding accruing lottery points, we raise the concept that only those people who applied for a river trip permit in the previous year will have their lottery point total increase by one, if they either didn't win a permit or didn't participate in a river trip during that year.

Not participating in a river trip should not be the only reason people are rewarded with more chances in an upcoming lottery. The accumulation of lottery chances should go to those people already applying for a permit. They are who should be rewarded with more chances in future lotteries.

Thus, we suggest consideration of the following changes:

- a. New river permit applicants start with one chance. It will not matter that they have not recently, or never have, gone on a river trip.
- b. Extra lottery chances should be awarded only to those people who applied for a noncommercial river trip permit in the previous year and either lost or did not participate in any river trip that year. Each following year they would get one additional chance in that year's lottery.
- c. If someone does not apply for a river trip permit in a lottery year no extra chance is awarded in the following lottery year.

4. (D-2) Modify the calculation method of the total chances of a lottery application for a noncommercial river permit when a Potential Alternate Trip Leader (PATL) is listed on the application.

Although we have no data on why river trip permit holders canceled their permits, we suspect that some, or many, of those cancellations could have been avoided if those trips had listed a PATL at the time of application.

The current system dissuades applicants from listing a PATL, as that application's chances in the lottery become the lower of the chances of either the primary applicant or the PATL. Many applications likely don't include a PATL for this reason. From a lottery chance viewpoint, two separate applications without a PATL listed have more lottery chances than one application with a PATL listed.

There should be more of an incentive to list a PATL than simply, "If the original trip leader must drop out, the rest of the group can continue their plans." (CRMP, page 14)

We suggest consideration of the idea that a lottery application with a PATL listed should have a chance total equaling that of the two people combined, the primary applicant and the PATL. Also, there should be no limit to the chance total.

This will equalize that single application's chance total with those two people's applications, if they were submitted separately. There would be no advantage to two people submitting two separate applications without a PATL rather than a single application that includes one of them as a PATL.

5. (D-3) Consider increasing the maximum number of passengers on a noncommercial standard size river trip in the shoulder and winter seasons from 16 to 24.

Page 6 of the CRMP states that the maximum group size allowed on commercial oar trips during shoulder seasons is 24. (That number is 32 in the summer season). Currently, noncommercial standard size trips are limited to a maximum group size of 16 people. It seems reasonable that same number apply for noncommercial standard size trips, too, during the shoulder and winter seasons.

We have no data regarding how many noncommercial standard trips would want to launch with a group size between 17 and 24. However, based upon the Grand Canyon River Office statistics of 2009 to 2012 and 2013 (preliminary) river use, we know that the average group size of a noncommercial standard trip in the shoulder seasons is 14 people and it is 10 people during the winter season. (Actually, it is less than these averages. The data does not factor in how many times one passenger spot in a group was taken by two people, exchanging places at Phantom Ranch).

Clearly the data tells us that an increase in the maximum group size allowed to 24 people will not stretch the People At One Time capacity of the river corridor. It will allow more trip flexibility for noncommercial boaters, some of whom will want a river trip with many members of their families.

Given this, we suspect that very few noncommercial groups would want to launch with more than the current limit of 16. Nonetheless, we request that those trips that would want to launch with more than 16 people be allowed to do so, as commercial trips during the year already do.

With the number of launches per day allowed and their trip lengths (page 5, CRMP), permitting what will probably be a small number of noncommercial trips in the shoulder and winter seasons to increase the size of their trips to a maximum of 24 people will very likely still keep the number of passengers at one time in the river corridor under the estimated maximum of 985 (CRMP, page 5).

6. (R-2) We recommend that the maximum trip length a noncommercial standard river trip can be in the winter season be increased from 25 days to 30.

From the Grand Canyon River Office statistics of actual noncommercial use for years 2009 through 2012, and from the preliminary river use statistics for 2013, the average length of a noncommercial winter trip during the past five years was 19.7 days. The highest average length during a year was only 20.5 days, during 2009. For 2010 to 2013 the average trip length was below 20 days.

We have no data of how many trips used the maximum 25 days to complete their trip or as little as 10 days. However, we believe many noncommercial trips would continue to stay in the range of a 20 day winter season trip. We would like those groups that want their river trips to be up to 30 days long to be allowed to do so.

We note that as there is only one launch per day allowed during winter season, with a current limit of 16 people per trip, if every trip were to be in the river corridor for a full 30 days, the maximum number of people who could be in the river corridor at one time would be 480. This is unlikely, but more importantly it is less than half the maximum of 985 Passengers at One Time estimated to occur (CRMP, page 5).

There were fewer than 20 winter trips at one time on the river during 2013, usually fewer than 15 (River Office Eight Year Update, October 2013). The CRMP aimed for a maximum of 60 Trips at One Time (page 5). In this regard, too, there is room within the CRMP for more noncommercial winter usage, that being to increase the winter trip length to 30 days.

We don't know how many noncommercial standard trips during winter season would use trip lengths of between 26 and 30 days. However, given that the average trip length now is well below the current maximum of 25 days, we suspect that should the maximum trip length be raised to 30 days the new average trip length during a winter season would not exceed 25 days.

Lastly, while user days are not a primary measure of noncommercial river usage, we see from the river statistics that the average user days for the past five winter seasons were 19,962 per season. This is far below the projected total of 34,087 per season.

The average number of passengers per trip was 10 during those five winter seasons. If every one of the 120 possible winter trips launched with the same current average of 10 people per trip and each trip took 30 days to through the canyon, it would add 6,000 user days to the winter season. Should there be an average of twelve people on all 120 trips for 30 days that would add 7,200 user days. The new total user days would still be well below the projected winter usage. There is room for more noncommercial winter usage via longer trip lengths.

From the 2009 to 2013 river statistics 509 of a projected 600 winter trips launched. As winter season trips are getting far below full interest in both the lengths of trips and the number of launches, there clearly is room within the CRMP to allow for those winter trips that do launch to be longer than 25 days.

The 1989 CRMP allowed for 30 day winter season trips. We see no reason why this should not be allowed again.

7. (D-6) We request consideration for increasing the maximum trip length for a noncommercial standard river trip launched in the period Sept 1-15 from 18 days to 21.

On page 21 of the River Office Eight Year Presentation of October, 2013, there is a "Potential Maximum Trip Length Change for Noncommercial Non-motor trips". Trips launching April 16-30 would decrease from 21 to 18 days. Trips launching September 1-15 would increase from 18 to 21 days.

We support a change that would increase the length of late September trips. We do not support a change that decreases the length of April trips, for reasons too numerous to list here.

We trust that the River Office has usage data which allows for longer noncommercial trip lengths when a trip launches from September 1-15, and that this will fit within the parameters of the CRMP. We would like to discuss this as an immediate change to the CRMP, for trips taking place in September, 2015.

8. (D-4) We would like to discuss and perhaps develop a method for rescheduling unused noncommercial trips for any date of a calendar year, such that they are rescheduled for later that year (if possible).

With the 2006 CRMP, noncommercial river runners achieved long awaited gains in the number of trips allowed to launch. They increased from 254 to 503 per year. They are very valuable to us and highly sought after, as every year's river trip lottery application data shows.

Unfortunately, sometimes for reasons beyond their control, permit holders must cancel their trips. Sometimes these trips cannot subsequently be awarded to anyone else to use on the original launch date.

The launch schedule within the 2006 CRMP was never like an airline selling overbooked seats and then foreseeing cancellations. There is little excuse to deny the public access to a launch forever because an unforeseen difficulty caused the cancellation of a trip for the day it was scheduled to launch.

Unused noncommercial river trip launches, for any reason, perhaps could be placed back on the launch schedule, on dates later in the same year, chosen at the River Office's discretion so that the TAOT parameter is not exceeded.

The River Office data for 2013 shows that very frequently during a year there are less than the targeted maximum of 60 Trips at One Time in the river corridor (River Office Eight Year Presentation, October 2013). We see, then, that there is room for more trips to be scheduled for almost any date.

9. (D-5) Consider adding small sized noncommercial trips to the March and October launch schedules.

Our intention is not to rewrite the noncommercial launch schedule, but to get closer to the noncommercial usage that was projected in the 2006 CRMP.

The CRMP established seasonal launch limits for noncommercial trips. However, we feel this can be selectively modified and the CRMP adaptively managed since the Grand Canyon River Office statistics of river usage from 2009 - 2013 show that noncommercial user days during the shoulder seasons are below what was projected.

We know from the River Office's Eight Year Update (October, 2013) that in 2013 the Trips at One Time (TAOT) during March ranged from 17 to 41, and during October it was from 34 to 48. The 2006 CRMP limits TAOT to 60.

There is room in the river corridor for more trips during March and October, and under this concept the TAOT parameter would not be exceeded during this period.

The recreational launch calendar for March currently consists of only two noncommercial launches per day. During October it is 1.5 noncommercial and 0.5 commercial launches per day. (Note that up to 4 trips a day may launch during April, and up to 6 trips a day during September [page 11, CRMP]).

We believe that during March and October there is room within the current launch calendar to add a small sized, noncommercial trip that would launch every other day, with there being no more than three launches on any March or October day.

In addition to the launch numbers, user days as a measure of noncommercial river usage are very important. As was noted in our introduction, "...the upper canyon focus is on user-days rather than trips or passengers." (CRMP Final Environmental Impact Statement, page 206).

If each additional noncommercial trip launched with eight people and was 21 days long, then a maximum of 2,520 user days would be added to the current totals for each month. The River Office statistics show that each year noncommercial user days now average 14,203 below projection.

We don't have user day data specifically for March and October, but we know from the Grand Canyon River Office statistics that during the shoulder season far fewer user days are being used by noncommercial boaters than was projected. We would like to selectively fit more trips into the launch calendar so that we can more closely approach full use of our allocation.