

## Questions, Questions, Questions

### The GCNP's Frequently Asked Questions (FAQ) About the Colorado River Management Plan

1. How are the modified preferred alternatives in the Final EIS different than current conditions?
2. How are the modified preferred alternatives in the Final EIS different than the preferred alternatives in the Draft EIS?

Please see the document titled "Key Changes in the FEIS from the DEIS" on the CRMP website at <http://www.nps.gov/grca/crmp> for detailed answers to this question.

3. How can an "environmentally preferred" alternative have moderate or major adverse impacts to resources?

As required under CEQ regulations 40 CFR 1502.2(d), NEPA documents must include a section stating how each alternative analyzed in detail would or would not achieve the requirements of sections 101 and 102(1) of NEPA and other environmental laws and policies.

The Congressional Declaration of National Environmental Policy (Sec. 101 [42 USC " 4331]) states the policy of the Federal Government is to "use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." The Environmentally Preferred Alternative analysis adheres to this policy and adequately considers whether each alternative meets (or does not meet) the criteria set forth in this Act.

While intensity-of-impact ratings for the various resource topics were an important component in the analysis of how well alternatives met the six criteria, the duration, timing and context of impacts contributed to the analysis as well. Another important component was whether these impact ratings could be reduced to minor with the implementation of reasonable mitigations. Given that impact ratings were not the same for all of the impact topics, there were times when overall effects outweighed those of a specific resource when determining how well each alternative met each of the objectives. (See Section 2.6 titled "The Environmentally Preferred Alternatives" in the Final EIS for more information.)

4. How can the NPS continue to authorize commercial services and motorized rafting on the Colorado River " are motors illegal according to the Wilderness Act?

The park's "Final Wilderness Recommendation " 1993 Update" identifies most of the Colorado River corridor as "potential wilderness." NPS policy requires potential wilderness "to be managed as wilderness to the extent that existing non-conforming conditions allow." (NPS 2000a:65-66). Under subsection 4(d)(5) of the

Wilderness Act, codified at 16 U.S.C. subsection 113(d)(5)(2000), commercial services may be authorized and performed within designated wilderness areas “to the extent necessary for activities that are proper for realizing the recreational or other wilderness purposes of the areas.” NPS policy states that commercial services that contribute to public education and visitor enjoyment of wilderness values or provide opportunities for primitive and unconfined types of recreation may be authorized in wilderness if they meet the necessary and appropriate criteria and if they are consistent with wilderness management objectives (NPS 2000a:71). The NPS has determined that the services provided by commercial outfitters, which enable thousands of people to experience the river in a relatively primitive and unconfined manner and setting (when many of them otherwise would be unable to do so), are necessary to realize the recreational or other wilderness purposes of the park.

The continued use of motorboats does not preclude possible wilderness designation because such use is only a temporary or transient disturbance of wilderness values and does not permanently impact wilderness resources or permanently denigrate wilderness values. (See section 4.8 titled “Impacts on Wilderness Character” in the Final EIS for more information.)

5. How were overall use levels, including Whitmore passenger exchanges, calculated in the FEIS?

Please see Appendix K titled “Estimating Use Levels” in the Final EIS for complete details.

6. When will the NPS develop limits of acceptable change (LAC) standards?

After the Record of Decision (ROD) has been signed, the National Park Service will develop a detailed plan for monitoring and implementation of the Colorado River Management Plan as described in the ROD. As part of the Monitoring and Implementation Plan, the existing LAC indicators and standards from the 1989 Colorado River Management Plan will be updated and implemented, as appropriate. Some LAC standards that were not identified in the 1989 CRMP that will be developed for the CRMP Monitoring and Implementation Plan include: soils, wildlife, natural soundscape, and wilderness character.

7. What will happen to the Colorado River Permit Waitlist now that a preferred option has been chosen in the Final EIS?

The preferred option for transitioning from the current, frozen waitlist to the preferred permit system (hybrid weighted lottery) is the Three-Stage Expedited Transition Option. The three stages of this expedited transition would take place during the first four to six months after the Record of Decision (ROD) is signed.

Stage 1 - During the 1st stage, members of the waitlist will be given one final two-month chance to schedule launch dates through the existing waitlist. A total of 600 launch dates (from the 2007 through 2011 seasons) will be made available for this purpose. People who are not successful in this stage would transition to stage 2.

Stage 2 - The 2nd stage will be a two-month, modified waitlist stage, in which waitlist members will be allowed to band together and advance up the list based on their combined waits. For example, if Pat had been on the waitlist for five years and Robin for nine years, their combined wait would be 14 years, so they would receive one number and be ahead of all those who had waited 13 years or less. After this two-month stage, 600 additional launches (from the 2007 through 2011 seasons) will be made available to those combined waitlist members with the greatest wait totals. People who are not successful in this stage would transition to stage 3.

Stage 3 ~ In this final transition stage, everyone left on the waitlist would need to give up their old waitlist spot and the existing waitlist would no longer exist. People will be given two basic choices:

- ~ Trade their spot on the waitlist for one extra chance in the new hybrid lottery for each year they had been on the existing waitlist (in addition to the total chances they would normally have had); or
- ~ Accept a refund for the price they paid to join the waitlist.

The NPS estimates that approximately 33% of current waitlist members will succeed in getting a launch through stage 1 and stage 2 and the majority of the rest will succeed in obtaining launches within ten years through the hybrid lottery system. (See section 4.4.8 titled ~Permit System Options Analysis~ in the Final EIS for detailed information.)

8. The NPS Modified Preferred Alternative H includes a ~no-motors~ period from mid-September through March, doubling the current no-motors period. How will this impact the short- and long-term monitoring and research activities being conducted in the shoulder and winter months?

Administrative use, including research and monitoring, is subject to the park's review process that includes a Minimum Requirement Decision Process (minimum requirement analysis). This is a two-step process that 1) determines if the action is necessary for management of the area, and 2) evaluates the appropriate methods or minimum tool to accomplish the objectives of proposed management actions. As an example, the majority of current research is prescribed through the Glen Canyon Dam Adaptive Management Program. Other laws and policies that guide management of Glen Canyon Dam Operations will be considered when applying the minimum requirement analysis. It is possible that an analysis may determine that motor boats are the minimum tool for achieving project objectives; in contrast, it may determine that non-motorized transportation may be the minimum tool. (See Appendix L titled ~Minimum Requirement Analysis~ in the Final EIS for more information.

1. What would the launch calendar look like if the modified preferred Alternative H is implemented?

See the attached Launch Calendar ([www.nps.gov/grca/crmp/5faq.htm](http://www.nps.gov/grca/crmp/5faq.htm)) for a sample of what the launch calendar would look like if the modified preferred Alternative H is implemented. (See the Final Environmental Impact Statement section 2.4.8 for more information about modified preferred Alternative H.)

2. How would administrative use be scheduled?

Administrative trips (research, resource management, educations, etc.) would be scheduled to minimize impacts to recreational users and encouraged to use secondary camps to reduce competition, especially during the high-use season. (See the Final Environmental Impact Statement section 2.3.2 for more information.)

3. How can I find my comments on the Draft EIS in Volume III?

The attached links provide the substantive comments ([www.nps.gov/grca/crmp/documents/substantive.pdf](http://www.nps.gov/grca/crmp/documents/substantive.pdf)) and non-substantive comments ([www.nps.gov/grca/crmp/documents/nonsubstantive.pdf](http://www.nps.gov/grca/crmp/documents/nonsubstantive.pdf)) databases on the Draft Environmental Impact Statement for the Colorado River Management Plan. Comments are sorted by a respondent's last name, followed by the first name and zip code respondent's provided in their comments.

To locate your comment(s) use the search function in Adobe Reader. This can be accomplished either using the "Edit" pull down menu and clicking on "Find" or the binocular icon in the toolbar menu. Search on your last name only. The search function will provide all entries with that last name. If multiple entries are found, the search function will provide the first name and zip code for each of those entries.

For example, if your name was Joe Smith you would enter "Smith" in the search criteria. The search engine would locate all entries with "Smith" in their name and provide a list of entries in alphabetical order. You would then scroll through those entries to find Joe Smith. The summary response codes associated with your name correspond to comment codes provided in Volume III: Comment and Response Document.

The most efficient way to find your codes in Volume III is to open that document electronically in Adobe Reader and search for each code in a similar manner as was described for finding your name in the report.

A list of nonsubstantive comment codes and their definitions can be found in Chapter 3: Summary of Nonsubstantive Comments in Volume III: Comment and Response Document.

4. What's the difference between a substantive and a nonsubstantive comment?

Comments were considered substantive if they: (a) challenge accuracy of analysis, (b) dispute information accuracy, (c) suggest different viable alternatives, or (d) provide new information that makes a change in the proposal. In other words, they “raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive” (NPS Director’s Order 12). From the nearly 10,000 submissions received on the DEIS, 5,793 individual substantive comments were extracted. Per guidance through the National Environmental Policy Act, these comments were summarized and are presented, along with a response, per issue or impact topic in Volume III of the Colorado River Management Plan Final EIS.

Nonsubstantive comments (also called “public concerns”) are comments that offer opinions or provide information not directly related to issues or impact analyses. Nonsubstantive comments were considered by the planning team also, but did not require a formal response. Nearly 30,000 nonsubstantive comments were identified that generally supported or opposed certain aspects of the plan.

Source: GCNP

From: the Waiting List, Winter 2005 pg 54-56

Please see the document titled “Key Changes in the FEIS from Current Conditions” or the Executive Summary on the CRMP website at <http://www.nps.gov/gca/crmp> for detailed answers to this question.