



*Backcountry Management Plan -
River Assisted Backcountry Travel Joint Comments*

Superintendent Dave Uberuaga
Wilderness Coordinator Linda Jalbert
Grand Canyon National Park
Box 129
Grand Canyon, AZ 86023

April 11, 2013

Dear Superintendent Dave Uberuaga and Wilderness Coordinator Linda Jalbert,

Since November 2012, Rich Rudow, board member at American Canyoneers and Dave Mortenson, board member at Grand Canyon Private Boaters Association, have been jointly working through the issues concerning RABT (River Assisted Backcountry Travel), for the upcoming Backcountry Management Plan. RABT is the much preferred term to packrafting because we feel it better implies our mutual position and philosophy in regard to backpackers relying in part on river travel.

We understand that the Scoping Period ended June 27, 2011, that NPS has reviewed 581 comments and is well into the process of finalizing a number of alternatives regarding this portion of the management plan. Our purpose in sending you this letter is not to become belated comment 582. Our purpose is to inform you the two organizations stand united on the following aspects of what we think the final plan should include. It is our hope that it will closely parallel one of the NPS alternatives and that we can strongly support such with a united voice.

We are in full agreement that the purpose of RABT travel should be part of an overland route that other wise could not be safely and/or conveniently completed. We do differ slightly on the degree of difficulty and convenience which the NPS should consider -- GCPBA being more restrictive, American Canyoneers being less restrictive. However, we see this as no more than a slight disagreement. We are also in complete agreement that no part of the plan should openly or inadvertently "open the door" for casual, sporting use of the river. For example, a mini river trip floating from Lee's Ferry to Cathedral Canyon and a hike out should not be granted a RABT permit.

GCPBA and American Canyoneers are not advocating for more backcountry use or expanded use of the River, as currently called for in the respective management plans.

Any use of the river will require either a backcountry permit or a river permit. We agree that a day user, who normally would not be required to have a backcountry permit, should have a backcountry permit if river usage is planned.

We both agree that Canyoneers or backpackers, like all other group types, can apply for a river permit in the weighted lottery and make that the focus of their river trip. Many do apply and run these types of trips when they win the lottery.

A “zone system” is the management approach of choice upon which we agree. Each individual zone would be defined along the river primarily by the accessibility to overland entrance and exit routes of the Canyon. The Zone system would be managed similar to current backcountry zones on a backcountry permit. Each river zone would have its own unique set of allowable uses and should include the number of people in a given zone at a given time, as well as overnights on the river portion. We also see the potential for some seasonal variation, with less restrictive rules during the winter seasons where river permit traffic is lower. River camping at traditional camps used by private and commercial boaters should be discouraged and be subject to the management restrictions in the river corridor that pertain to river runners. We are in agreement that zones would have different allowable uses defined by NPS, and may with time and management conditions require modification in delineated uses. We also support public comment on any changes, to help educate and inform users and improve possible decisions.

A great deal of collective experience, and details have been thoroughly presented and discussed with each other. We are quite pleased that GCPBA and American Canyoneers are able to work together to be able to present NPS with this mutual agreement letter. We are convinced it puts forth a very workable plan. Representatives of each group are available to answer questions and further discuss this with you.

While submitted post Scoping Period, we hope the back country management plan team will consider it as part of its final decision.

We look forward to hearing from you.

Thank you,



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