

APPENDIX B: PUBLIC SCOPING SUMMARY

ERRATA SHEET

The June 2003 Summary Public Scoping Issue Analysis contained an error on pages 1 and 2. The meeting held in Peach Springs, Arizona on September 3, 2002, was not a public scoping meeting as stated, but a town meeting held at the request of the Hualapai Tribe. This meeting was part of tribal consultation for the CRMP EIS. Therefore, there were seven public scoping meetings, rather than eight as stated.



Summary

Public Scoping Issue Analysis
Grand Canyon National Park
Colorado River Management Plan and
Environmental Impact Statement

Prepared for

Grand Canyon National Park
Grand Canyon, Arizona

By

SWCA Environmental Consultants
June 2003

SWCA
ENVIRONMENTAL CONSULTANTS

Public Scoping Issue Analysis Summary

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INTRODUCTION

On June 13, 2002, the National Park Service (NPS) issued a Notice of Intent (NOI) in the *Federal Register* for the preparation of an Environmental Impact Statement (EIS) for the Colorado River Management Plan (CRMP). As stated in the NOI, "The purpose of this EIS/CRMP is to update management guidelines for the Colorado River corridor through Grand Canyon National Park." During a public scoping period from June 13 to November 1, 2002, the NPS sought public input to reaffirm previously identified agency and public issues and to identify any new public issues and concerns. Previously identified agency and public issues were compiled in the *Summary of Public Comment from the 1997 Colorado River Management Plan Scoping Process, April 1998*, which is posted on Grand Canyon National Park's (GRCA's) CRMP Internet site (www.nps.gov/grca/crmp). Information about the 2002 scoping process was disseminated to the public, and input was solicited, through GRCA's CRMP Internet site, press releases, mailings, and public meetings.

Public Scoping

Scoping is required for National Environmental Policy Act (NEPA) compliance documents, including EISs, to determine the scope of the document; that is, what will be covered and in what detail. The scoping process must be open to the public; state, local, and tribal governments; and affected federal agencies. The objectives of scoping are:

- Involve as many interested parties as possible in the environmental review process.
- Provide clear, easily understood, factual information to potentially affected parties.
- Provide meaningful and timely opportunities for public input.
- Identify, consider, and evaluate significant issues raised by interested parties to assist in the preparation of the Grand Canyon CRMP/EIS.
- Identify and eliminate from detailed study the issues that are not significant.
- Consider public comments throughout the decision-making and review process.

Public Meetings

As part of the 2002 scoping process for the CRMP/EIS, GRCA retained a consultant, The Mary Orton Company, to help organize and manage a series of public meetings. More than 1,000 people attended a total of eight such meetings, which were held on the dates and in the communities listed below.

August 1, 2002	Denver, Colorado
August 6, 2002	Sandy, Utah (suburb of Salt Lake City)
August 8, 2002	Flagstaff, Arizona
August 13, 2002	Las Vegas, Nevada
August 15, 2002	Mesa, Arizona (suburb of Phoenix)
September 3, 2002	Peach Springs, Arizona

September 30, 2002 Towson, Maryland (suburb of Baltimore)
October 2, 2002 Oakland, California

The meetings were structured as open houses. Information about the CRMP/EIS process was presented through posters, handouts, and a large map of the project area. National Park Service personnel were available to answer questions, and rooms were provided for facilitator-led discussion groups. Attendees were invited to write comments on flipchart tearsheets and the map, provide comments orally to a court reporter, and submit written comments. A form and a permit-related questionnaire were provided for that purpose. Comments made during the discussion groups were recorded by the facilitators on flipchart tearsheets.

PUBLIC INPUT TO THE GRAND CANYON CRMP/EIS PROCESS

Written public comments were submitted to GRCA by e-mail, U.S. mail, and hand delivery, as well as at the open house meetings. Organization and analysis of the submissions were completed with the assistance of SWCA Environmental Consultants, a firm retained by GRCA to help develop the EIS. The submissions were organized into ten categories to facilitate handling, analysis, and archival storage. These categories are listed below.

Letter (L)	Boater's Questionnaire (B)
Form Letter (FL)	Open House Flipchart Tearsheets (T)
E-Mail (E)	Discussion Group Flipchart Tearsheets (D)
Form (F)	Map (M)
Permit Questionnaire (P)	Recorded Transcript (R)

In all, 13,770 submissions were received, cataloged, and reviewed.

REVIEW AND EVALUATION OF SCOPING COMMENTS

Members of the CRMP/EIS team read through every submission. They identified specific comments within each submission and coded them according to criteria developed for the process. When the initial review process was completed, a total of 55,165 comments were identified within the 13,770 submissions. Comments were screened again to summarize observations, opinions, concerns, and recommendations. This process resulted in the summary table of comments appended to this document. Almost every major comment received in 1997 (see *Summary of Public Comment from the 1997 Colorado River Management Plan Scoping Process, April 1998*) was reiterated in 2002, plus several more. Given the number of comments received in 2002 (over 55,000), the variations in detail are boundless. The major issues stand out, however, and are consistent with those raised in 1997. They are encapsulated in the statements provided below. Many very detailed proposals and discussions were received, several greater than 50 pages. It was not possible to adequately summarize every specific suggestion offered in some of those longer submissions; however, they have been and will continue to be carefully considered in developing the plan and EIS.

Major Issues Raised in the 2002 Scoping Comments

Access and Visitor Services

- The NPS should not implement any management action that would reduce opportunities for the public to experience a Grand Canyon river trip. A wide range of river running opportunities should be provided (including educational trips) for people with different skill levels, time

constraints, levels of income, physical needs, and for those who desire different kinds of experiences.

- The NPS should provide more equitable access for different kinds of river use (see issues related to allocation, permits, and level of use).
- Repeat use should not be limited for non-commercial trips. Experience is gained through repeat use, and having experienced users on trips adds to safety and enhances the experience.
- Non-commercial trips should be allowed to use paid guides and/or rental services.
- Non-commercial trips should not be allowed to use paid guides and/or rental services.
- Infrastructure should be improved, both physical facilities on the river and technological communications with the public (web communication with users, e.g., calendar of launches, research results). The ramp at Lees Ferry should be improved; facilities at Phantom Ranch should be increased; facilities like Phantom Ranch should be added at other locations (but kept unobtrusive); a channel should be dredged in Lower Granite Gorge to restore more natural river flow.
- Additional riverside facilities should not be permitted.

Motors and Aircraft Use

- Use of motorized craft should be reduced or eliminated because it is incompatible with the wild, backcountry character of the river. Motorized craft disturb natural quiet, impair air quality, and/or detract from the quality of what should be a primitive recreational experience. The non-motorized season should be extended and/or redefined (several suggestions). Quieter motor technology should be encouraged or required. Personal watercraft (jet skis) should not be allowed upstream of the Grand Wash Cliffs.
- Use of motorized craft should not be reduced or eliminated because it allows access for the maximum number of people, including 1) special populations (e.g., disabled, elderly, physically unfit), 2) people too inexperienced to mount a private trip, and 3) people who cannot afford the time or cost of a non-motorized trip. Motors allow convenient short trips and reduce congestion on the river. Current motor technology is quiet, does not contribute to noise or air pollution, and does not detract from visitor enjoyment.
- Helicopters (including helicopter exchanges at Whitmore) should be eliminated from within Grand Canyon except for emergencies. They are incompatible with the wild, backcountry character of Grand Canyon, disturb natural quiet, impair air quality, and detract from the quality of the recreational experience. They introduce mechanized, frenetic, stress-inducing activity, which many people take Colorado River trips to avoid. Helicopter exchanges allow short, hurried trips that are inappropriate for Grand Canyon.
- Helicopter exchanges should not be eliminated because they increase access (particularly for special populations) by providing shorter trips and a way to get in and out of the Canyon without having to hike, ride a mule, or traverse long, primitive roads (especially onerous during hot months). Reintroducing mules at Whitmore would cause different environmental impacts, including odor and flies. Helicopter use provides essential income for the Hualapai Tribe, and its elimination without commensurate compensation would result in undue economic impact on the Tribe.

Allocation and the Non-Commercial Permit System

- The current allocation between commercial and non-commercial use is unfair and should be made equitable (a 50/50 split was commonly recommended), or non-commercial use should have the larger allocation. The long wait by non-commercial users and limitations on repeat use cannot be justified while commercial passengers can go on short notice and as often as they want. It is also unfair that guides are not counted in the commercial allocation. Suggestions for remedy include increasing the non-commercial allocation by decreasing commercial use (various levels recommended) or by increasing overall use (various levels recommended). Guides should be included in the commercial allocation.
- The current allocation is appropriate and should be maintained, or commercial use should have an even larger allocation. Compared to non-commercial use, outfitters serve far more potential users, allow greater public access, offer more and better services (e.g., expertise, safety, education), and provide better stewardship of the Canyon and its resources. Commercial guides act as an “enforcement” arm for the NPS, while non-commercial users are less likely to obey the rules. Respondents taking this position often recommend that non-commercial use should be further restricted, eliminated, or better regulated by the NPS. Non-commercial permit holders should meet certain minimum qualifications (e.g., previous rafting experience, knowledge of Grand Canyon, demonstrated knowledge of regulations).
- Commercial use should be reduced, eliminated, or better regulated (especially fees charged customers) because it exploits the Canyon for profit, inappropriately dominating use of a public asset to financially benefit a handful of private companies. Small companies should replace large ones; outfitters should be phased out as their contracts expire or they sell; Incidental Business Permits should be allowed to supplement or replace the current concession system.
- Allocation between commercial and non-commercial use should be abandoned in favor of a “common pool” system so that all interested people have an equal chance to run the river, whether they want the assistance of an outfitter or not. Several suggestions were offered about how to implement such a system.
- A common pool system should not be implemented because it would be unmanageable for commercial outfitters, preventing them from providing essential services. Under a common pool system, applicants who want a commercial trip might swamp non-commercial applicants, further reducing their ability to get on the river.
- The current non-commercial permit system is unfair, cumbersome, costly, and subject to many kinds of abuses. The waiting list is far too long and should be reduced or eliminated. Those currently on the list, especially those who have already waited many years, should not be penalized if the system is changed. Many suggestions, some very detailed, were offered for revamping the current system to eliminate or reduce these problems.
- The permit system should be replaced by a lottery or reservation system. Several variations were offered, including weighted lottery or reservation systems and hybrid systems incorporating elements from the existing system.
- A lottery should not be instituted because some people would never win a permit.

Level of Use/Crowding, Trip Length, Group Size

- Overall use should be increased to provide more access, particularly for non-commercial users. Crowding can be avoided by extending the primary season into spring and fall; increasing winter use; evening out launches over the week, season, or year; or by scheduling use of campsites and attraction sites.

- Existing use levels should not be increased because crowding and impacts on the environment would be a problem. Scheduling use of campsites and attraction sites should be avoided because it would be unworkable and would detract from the spontaneity of a backcountry river experience. Also, use levels should be decreased to reduce excessive crowding and/or impact on cultural and natural resources.
- Trip length maximums should be decreased to allow more access for others.
- Trip length maximums should be increased to provide opportunities for a richer experience (e.g., slower pace, more hiking). Trip length minimums should be increased to preclude quick, hurried trips, particularly above Diamond Creek.
- Group size maximum should be decreased to provide a truer backcountry experience, increase opportunities for solitude, reduce noise and social interactions, reduce crowding, and reduce impact on resources.
- The group size maximum is fine or should be increased to increase access opportunities.

Resource Protection, Tribal Issues, NPS Regulations

- Protection of natural and cultural resources should be the NPS's first priority. The NPS should use an adaptive management approach, improve monitoring, and increase/facilitate research activities to better conserve and restore natural conditions.
- NPS should eliminate adaptive management, reduce the number of research trips, and place more restrictions on research activities (e.g., who can participate, when they can launch, type of craft used, where they can camp).
- Natural resource concerns expressed in comments include protection of wildlife, preservation/restoration of endangered or rare native species (notably native fish), reintroduction of extirpated native species, and eradication of non-native species (notably tamarisk). Excessive social trailing is a problem; trails should be established and maintained where erosion, trampling, and multiple trails are evident. Loss of camping beaches should be addressed through Glen Canyon Dam operations, artificial infusion of sand below the dam, and/or by removal of invasive vegetation. Impacts on air and water quality due to motor use should be addressed.
- Non-native trout should be conserved for angling opportunities. Trails should not be established and maintained; the NPS should use a minimum tool philosophy, keeping management intervention to a minimum. Use of herbicides to reduce invasive vegetation should be reconsidered.
- Specific cultural resource concerns include damage to archaeological sites, with suggestions for restricting access to some sites.
- Access to archaeological sites should not be restricted.
- Access to Native American sacred sites should be prohibited and access to adjacent tribal lands restricted to specified areas under specified conditions. The NPS should better enforce these regulations and should coordinate and collaborate with tribes to manage river use; support tribal needs (particularly at the Diamond Creek take-out); provide more opportunities for tribal participation in river use upstream of Diamond Creek; and generally respect tribal sovereignty. Tribal use of the Grand Canyon should be held to the same standard as non-tribal use.
- NPS personnel should step up enforcement, increase river patrols, restrict alcohol use, extend drug testing, and prohibit nudity to better protect the environment, increase safety, and reduce unruly behavior that detracts from the quality of the river experience for others. They should provide more information about regulations, proper river etiquette, and the Canyon (geology/

biology/history) before launch, at launch, and on-river (e.g., join all trips or visit camps more often). They should make better use of the Internet, particularly in regard to launch schedules, research activity, and permit cancellations.

- The NPS should reduce their presence on the river, be less confrontational, never visit camps, and never carry firearms. NPS should eliminate drug testing for commercial guides.

SCOPE OF THE CRMP/EIS

The purpose of the CRMP is to provide direction for resource preservation and visitor experience as they relate to visitor use of the Colorado River corridor. According to the Notice of Intent published in the *Federal Register* on June 13, 2002, the CRMP/EIS will include, but not be limited to:

- appropriate levels of visitor use consistent with natural and cultural resource protection and preservation mandates;
- allocation of use between commercial and non-commercial groups;
- the permitting system for non-commercial users;
- the level of motorized versus non-motorized raft use;
- the range of services and opportunities provided to the public; and
- the continued use of helicopters to transport river passengers to and from the Colorado River near Whitmore Wash (in consultation with the Hualapai Tribe and other appropriate parties).

Issues Raised in Public Scoping Determined to Fall Outside the Scope of the CRMP/EIS

Some issues that were raised during public scoping are outside the scope of the CRMP/EIS because 1) they do not directly address management of visitor use; 2) they are the subject of separate planning processes; and/or 3) they are beyond GRCA's management authority. Comments included in this group include positions both for and against the following:

- Decommissioning or regulating Glen Canyon Dam.
- Designating the river corridor as a Wilderness and/or as a Wild and Scenic River.
- Eliminating overflights.

Park boundary issues also fall within this group.

Another set of issues raised by the public are outside the scope of the CRMP/EIS process because they concern activities that are administrative in nature. These comments include the following:

- A specific allocation should be established for GRCA administrative use, and that allocation should be included in a total user-day cap. This suggestion is considered out of scope because management-related administrative use enables GRCA personnel to fulfill their mandated responsibilities. The level and timing of NPS presence on the River, therefore, must remain flexible. GRCA will continue to permit administrative activities based on resource protection, safety, and information needs with appropriate restrictions and an approval process. Uses such as education, however, are subject to consideration in the CRMP/EIS.
- Several comments address detailed operating requirements for both commercial and non-commercial use. Included in this category are specific suggestions for managing repeat use, private trip cancellations, launch schedules, sanitary waste disposal, fee structures, etc. These comments are outside the scope of the CRMP/EIS because they concern specific measures that

may be subject to change based upon new information or improved practices. As such, they more properly relate to operating requirements, which are detailed instructions implementing CRMP guidance. Operating requirements may be changed administratively as long as they are consistent with CRMP guidelines. In contrast, the CRMP is intended to provide overall guidance for the management of recreational use of the Colorado River corridor in the Park. Changes to the CRMP would require a NEPA document and a major planning effort.

Lastly, elimination of both commercial and private river uses of the river was recommended during public scoping. Neither suggestion will be considered in the CRMP/EIS because GRCA has determined that some level of commercial and private river operations are necessary and appropriate to meet GRCA General Management Plan goals.

Summary of the 2002 Public Scoping Comments

ACCESS

- A broad cross section of the population should have access to the river. Access should not be limited any more than necessary to protect resources.
- Increase access for special populations (disabled, elderly, juveniles, low-income).
- Ensure access for Native Americans with a traditional affiliation with Grand Canyon.
- Prioritize or restrict access to protect resources.
- Allow access only for U.S. citizens.
- Repeat use should be restricted because demand exceeds supply. Multiple suggestions were offered for restrictions (number of trips per time unit).
- Restrictions on repeat use should be equitable for both non-commercial and commercial users.
- Repeat use should not be limited.

ADMINISTRATIVE USE & NPS MANAGEMENT

- Current river management is satisfactory.
- The Park should receive more funding to better manage recreation and resources.
- NPS should base management decisions on scientific research (e.g., evaluate motor-use impacts on resources, conduct carrying capacity study).
- NPS should use minimum tool criteria when managing the river.
- River and backcountry management should be coordinated to prevent campsite conflicts between river runners and hikers.
- NPS patrols for conformance to regulations should remain the same or be increased; more effort should be made to enforce regulations.
- NPS patrols negatively affect visitor experience; should be reduced; should be eliminated.
- Administrative use trips (including educational trips) should be counted within overall use limits and the schedule of trips made public. Such trips should have specific allocations.
- Non-working NPS staff and non-researchers on NPS/research trips and educational trips under the guise of administrative use are an abuse; they should use outfitters.
- Expand drug testing among all river users.
- Eliminate drug testing for commercial guides.

- Restrict and/or prohibit alcohol use, smoking, and nudity. Rowdy behavior is offensive to other river users and impairs their river experience.
- Non-commercial use should be better regulated (e.g., more stringent qualifications, including licensing of trip leaders; more in-depth orientation for trip participants).
- Required qualifications for commercial guides should be increased.
- Some outfitters abuse their privilege by charging excessive rates, making excessive profits, and providing luxurious services inappropriate for a backcountry experience.
- NPS should increase activities to instruct all users about Canyon resource protection, river etiquette, and regulations (e.g., more guide training, better orientation at Lees Ferry, more camp talks, accompany trips).
- NPS should offer a wider variety of educational opportunities to river users (e.g. signage, interpreters, website).

ALLOCATION

- Base allocation on demand; conduct a demand study.
- Maintain current commercial/non-commercial allocation. It works well; reflects relative demand.
- Make the commercial and non-commercial allocations equitable (suggestions: 50/50 split; 40/40 split with 20% administrative use). Current allocation is unfair to non-commercial users, forcing applicants to wait many years while all commercial users have a short wait. Current allocation does not reflect large and growing demand by those who most value river running (devote the most time, effort, and resources to it).
- Give larger allocation to non-commercial use than to commercial use (various percentages suggested).
- Increase non-commercial allocation but do not decrease commercial user days (i.e., increase total user days).
- Increase non-commercial allocation by decreasing commercial user days. Some suggested eliminating commercial use altogether (various phase-out, buy-out options suggested) because it is inappropriate exploitation of a public resource for the financial benefit of a few entrepreneurs.
- Reallocate commercial motorized use to non-commercial, non-motorized use.

ALLOCATION (CONT.)

- Increase commercial allocation. Outfitters provide more access and services (see also Visitor Services section) for the general public. Some suggested decreasing or eliminating non-commercial use altogether, primarily because private parties are less likely to care for the environment, abide by regulations, or cooperate with other river users.
- Transfer some commercial user days to educational uses.
- Commercial crews should be counted within the commercial allocation.
- Ensure that all unused user days are reallocated within the same sector or to the other sector.
- Eliminate allocations; replace with a common pool system. Multiple suggestions were offered for how to implement such a system.
- Do not consider a common pool (e.g., would group strangers on a private trip, make planning difficult for commercial outfitters currently doing business in the Canyon, commercial market would swamp pool further reducing non-commercial access).

COST

- Commercial trips should include more affordable options; high costs limit access to the wealthy.
- Commercial rates are not excessive; they do not limit access.
- Maintain current non-commercial fee structure. It works well.
- The current non-commercial fee system is unfair, unaccountable, and confusing and should be changed (multiple suggestions offered).
- Non-commercial fees are too high and should be decreased.
- Non-commercial and commercial “fees” should be equivalent.
- Increase current non-commercial fees to discourage non-serious applicants and reduce wait list.
- Change or eliminate the Colorado River Fund; the fee demo.
- Park needs to be more accountable for what is done with fee income. Multiple suggestions were offered for how it should be spent, including subsidies for special populations, research, recovery of native species, Park maintenance, more NPS presence on river, buy-out of outfitters for reallocation to non-commercial use.

LEVEL OF USE

- Instead of “user days,” manage use by launches and/or number of people.
- Continue “user days” system to measure and limit use.
- Maintain the current level of use. There are no apparent negative impacts.

- Reduce the current level of use to reduce negative impacts.
- Eliminate all use until native habitats can be restored.
- Increase the current level of use to allow greater access (particularly for non-commercial use); confine increase to the secondary season; consider making the river corridor a high use zone.
- Do not increase the current level if it will degrade resources and quality of visitor experience.
- Mitigate impacts rather than restrict use.
- Reassess the river’s carrying capacity (crowding, impacts to resources).
- Crowding is a problem, especially at attraction sites; multiple suggestions were offered for how to reduce crowding and encounters with others using trip scheduling, trip length, levels of use, launch dates.
- Crowding is not a problem; crowding at attraction sites is not a problem.
- Fewer and smaller beaches reduce carrying capacity, increase crowding; increase the number and size of beaches to increase access.

MOTORS

- Allow motor use to continue at existing levels or increase. Motorized trips allow more people to experience the river because of shorter trips and larger group sizes, allow access for a broader cross-section of the population (e.g. disabled, elderly, juveniles), reduce crowding by allowing faster trips and varying speed, reduce contact time with other groups, and afford a higher level of safety to all river users.
- Motorized trips result in an acceptable level of environmental impact; noise levels are low because of 4-stroke motors; air pollution is not a problem.
- Eliminating motors would increase hiking and associated problems.
- Eliminate/phase out or reduce motor use. It produces air, noise, and water pollution and promotes fast, hurried trips, violating the natural sound, pace, and tranquility that should characterize a river experience. Motors are incompatible with wilderness.
- Motorized trips negatively affect non-motorized trips.
- All non-commercial trips should be non-motorized.
- Extend and/or reschedule the no-motor period (multiple suggestions for duration and timing).
- Ensure quiet or non-polluting motor technology; offer incentives (user days, fee reduction) to commercial operators who incorporate low-noise/pollution motor technology.
- Environmental effects of motors cannot be mitigated through technology.
- No personal watercraft (jet skis) should be allowed upstream of Grand Wash Cliffs.

AIRCRAFT

- Keep helicopter exchanges. They increase access by allowing less expensive, more convenient shorter trips; allow access for those who cannot, should not, or who would rather not hike; add another adventurous element to the river experience; eliminate long, hot, dusty rides over primitive roads; permit quick trips between airports and the Canyon.
- Helicopter exchanges at Whitmore reduce the load on take-out facilities at Diamond Creek and provide essential income for the Hualapai Tribe.
- Helicopter exchanges do not impact the wilderness experience. They are confined to a small area and operate for only short periods and at times when few other trips are in the vicinity.
- Decrease or eliminate helicopter use except for emergencies. Helicopters are highly intrusive on the natural quiet and splendor of the Grand Canyon backcountry. They introduce the noisy, mechanized, rushed attributes of the urban world that people come to the Inner Canyon to avoid. They detract from the quality of the river experience for others.
- Ending a river trip by a helicopter fly-out is abrupt, shocking, and inappropriate.
- Helicopter exchanges exist mainly to financially benefit outfitters by breaking up what should be single trips into multiple short trips that are profitable and easy to market.
- Substitute less intrusive modes of transport at Whitmore (e.g., mules/hiking/ airship).
- Mules should not be used at Whitmore; they create unsanitary conditions, foul odors, and flies. The trail is too difficult and hot in the summer to be hiked safely. The road from the trailhead is long, rough, and hard on vehicles and passengers.
- Require quieter helicopters.
- The heavy use of helicopters below Diamond Creek is inappropriate and offensive.

NEPA / PLANNING PROCESS

- The CRMP should be based on ecosystem management.
- The CRMP should incorporate adaptive management to allow future flexibility; provide for an ongoing advisory committee (e.g., similar to the AMWG); provide for frequent review and adjustment of Plan.
- The scope of the CRMP should include tributaries.
- Increase public participation in the CRMP/EIS process beyond the local region; include stakeholders in planning; make relevant scientific information available to public.
- Open house forum at public scoping meeting was an improvement over past public scoping methods. Open house was enjoyable.

PERMITS

- Maintain the current permit system; it is adequate.
- The current permit process is discouraging, complicated, inequitable, and the waiting time is far too long.
- The current permit system is rife with abuse (e.g., a small number of people take advantage of the system to make frequent repeat trips; some names are just placeholders, cancellations are excessive).
- The permit system should be simplified and made fair/equitable. Multiple, detailed suggestions were offered for modifying the current permit system (e.g., make permits transferable, allow more repeat use, provide more equal access among all non-commercial users, institute comparable wait times for commercial and non-commercial users).
- The waiting list should be made shorter (multiple suggestions offered).
- Transition to a different system other than the wait list should give priority to those already on the wait list.
- Replace the existing permit system with an auction.
- Replace the existing permit system with a lottery (multiple variations suggested).
- Do not consider a lottery (some people will never win a trip).
- Institute a reservation-based system (multiple variations suggested).
- Institute a hybrid permit system (multiple variations suggested).

RESOURCES

- Protection of ecological and cultural resources should be NPS's first management priority.
- Resources should be monitored for impacts.
- NPS should consider closing areas experiencing excessive impacts.
- Noise is a problem (large, motorized rafts; helicopters).
- The impact on air quality by motorized rafts is a problem.
- Social trailing is a problem and should be reduced; NPS should mark and maintain trails.
- NPS should modify terrain (e.g., do trail work) only where habitat preservation is necessary.
- Vegetation should be protected, including in the old high water zone and side canyons.
- Wildlife (e.g., bighorn sheep, condors) should be protected. River users chasing and catching wildlife is a concern.
- Visitor impacts on beaches are a problem (e.g., litter, urine, erosion).
- Beaches show little evidence of visitor impact.
- Restore beaches by sediment infusion, stabilization, reduction of encroaching vegetation.
- Near-river springs and seeps are valuable resources and should be protected.

RESOURCES (CONT.)

- Tributaries are an exceptional resource, should be managed and protected from visitor impact. Pollution from chemicals (sunscreen, shampoo, etc.) and human waste may be a problem.
- Visitor use of tributaries may increase native fish food supply by stirring up substrata.
- Protect, restore endangered species, including native fish (e.g., humpback chub, razorback sucker, Colorado pikeminnow).
- Re-introduce extirpated species, such as the otter and muskrat.
- Take management action to eliminate or reduce non-native species (particularly tamarisk); find means other than herbicides to control non-native plants.
- Keep species that have adapted to the dam-altered river (e.g., trout).
- Cultural resources, sacred sites, Indian lands are valuable and should be protected; install unobtrusive signs about site protection.
- Continue to allow public access to cultural resources.
- Close cultural sites if they are being impacted.
- Protect natural visual quality. Reduce trash; keep Canyon clean.
- Protect water quality.
- Maintain or increase scientific study on the river, increase communication of research results with public; allow increased motor use to facilitate research; simplify research permitting process, use consultants as much as possible.
- Be more stringent in determining which research projects are allowed; reduce the number of research trips; make more use of volunteers in the river running community; require research trips to camp at small campsites.
- Several suggestions were offered for resource research, monitoring, and management (e.g., study impact of group size, increased levels of use).

SCHEDULING

- Use the computer simulator to schedule use.
- Several suggestions were offered for redistributing launches (daily, weekly, seasonally, evenly over a year) to achieve fair scheduling for commercial and non-commercial trips, reduce crowding, allow more trips.
- Use shoulder seasons and/or winter season to increase use (commercial and/or non-commercial) or better manage existing use.
- Do not extend commercial use into winter months.
- Offer incentives for off-season use.
- Assign campsites, assign all or some attraction site stops to reduce crowding and/or increase access; require some shared use of campsites at pinch points.

- Do not assign campsites or attraction site stops. That would remove spontaneity, reduce the quality of the river experience, and may not be possible to achieve.
- Continue to allow layovers. They allow a slower-paced trip with more opportunities for solitude, quiet, and a chance to explore more of the Canyon.
- Reduce/eliminate layovers, particularly during the summer and at high-use camps. That would reduce crowding and conflict between trips.
- Reduce/eliminate all exchanges. They increase crowding above Phantom and promote quick, more superficial trips.
- Maintain or increase exchanges to provide a wide range of trip experiences and access for more people.
- Each exchange should be counted as two user days; each exchange should be counted as one user day.

TRIBAL ISSUES

- Respect tribal concerns and authority regarding river management.
- Allow tribes (specifically the Hualapai) to have a concession at Lees Ferry; allow the Hualapai Tribe to operate a concession from Lees Ferry; facilitate hiring of Native American guides; coordinate with tribes for economic development.
- A percentage of fees should go to neighboring tribes to help them accomplish shared tribal/Park objectives.
- Help the Hualapai Tribe with take-out facilities.
- NPS should assist in controlling trespass on tribal land and sacred sites and increase education of river users about tribal authority.
- Maintain income for the Hualapai Tribe by keeping the Whitmore exchange.
- Work with the Hualapai Tribe to preclude helicopter use and up river travel above Diamond Creek.
- Multiple suggestions were offered for improving the Diamond Creek area (e.g., more ramadas, better toilet facilities).
- The Hualapai Tribe should abide by the same standards/regulations as other users; should work with the NPS to avoid uses of tribal land incompatible with national park values; should reduce operations below Diamond Creek to reduce noise and crowding.
- Diamond Creek Road condition and need for more facilities along the road and at Peach Springs.

TRIP LENGTH / GROUP SIZE

- Do not manage group size and/or trip length.
- Trip lengths should remain unchanged; the system works well as it is. Various trip lengths should continue to be allowed to provide a variety of experiences.

TRIP LENGTH / GROUP SIZE (CONT.)

- All trips should be the same length.
- It is important to allow short trips (week or less) for those who are limited by time and/or money. Shorten trip length by increasing the allowable speed of motorized craft, by allowing and encouraging exchanges.
- Reduce non-commercial trip length to allow more access for others.
- Increase the allowable length of trips (commercial and non-commercial) to permit more hiking, a slower pace, a more contemplative experience; reduce the number of short trips.
- Maintain the current maximum commercial and non-commercial group sizes.
- Group size limits should be the same for all users.
- Decrease the maximum commercial and non-commercial group sizes. Large group sizes and large boats increase a sense of crowding; provide less opportunity for solitude and quiet; require large camping beaches that are limited in number. Large groups and double camping result in greater resource impacts.
- Number of boats on large non-motorized trips creates on-river congestion (more difficult to pass) and crowding at attraction sites.
- Increase or maintain opportunities for very small groups to provide a greater range of experiences.
- Eliminate small groups to allow more use.

VISITOR EXPERIENCE

- Thousands of comments were received that described valued attributes of a river trip experience but did not raise issues or concerns.

VISITOR SERVICES

- Provide a wide range of river running opportunities for people with different skill levels, time constraints, levels of income, physical needs, and for those who desire different kinds of experiences.
- Opportunities for river users should include educational trips.
- Allow access and egress at any point for inflatable kayaks.
- Allow commercial operations to continue (at existing level or increase). They permit greater access and provide valuable services (e.g., education, safety for both passengers and non-commercial trips, camp hygiene, stewardship of resources, supervision to constrain behavior, environmental awareness). They share provisions with non-commercial users and allow repeat use for clients.
- Commercial outfitters run more responsible trips than non-commercial users because of concession contract requirements. Non-commercial users lack supervision and are less safe, clean, protective of resources, considerate of other users, more likely to impact off-river resources from more hiking.

- Commercial trips provide opportunities for shorter trips.
- Commercial and non-commercial passengers need better education about river etiquette.
- Eliminate or reduce commercial operations. Profit making is inconsistent with national park purposes and values; advertising inflates demand for commercial use.
- The concessions as currently managed violate NPS policies and mandates (e.g., minimum tool requirement, wilderness management, providing public access at reasonable prices). NPS should reform the system (e.g., enforce strict adherence to NPS regulations, limit profit, do not give preference to current concession holders when contracts expire, consolidate all companies into one, break up large companies into smaller ones). NPS should reassess the level of commercial services needed on the river before renewing contracts.
- The ratio of commercial guides to passengers seems right and should remain the same. The ratio should increase to provide better supervision.
- Non-commercial trips should be allowed to use paid guides and/or rental services.
- Non-commercial trips should not be allowed to use paid guides and/or rental services.
- Permit bonfires below Diamond Creek.
- Do not permit additional riverside facilities.
- Improve infrastructure, both physical facilities on river and technological communications with the public (web communication with users, e.g., calendar of launches, research results); improve ramp at Lees Ferry; increase facilities at Phantom Ranch, including an ice machine and a water line down to the boat beach; add more facilities like Phantom Ranch at other locations but keep them unobtrusive; dredge channel in Lower Granite Gorge to restore more natural river flow.
- Improve human waste disposal procedures and facilities; provide waste disposal at termination points.
- Provide better emergency communications.
- Commercial river running represents a historic use/livelihood that needs to be protected and preserved.

PUBLIC COMMENT ISSUES OUTSIDE OF SCOPE

Wild and Scenic River Designation

- The river should receive Wild and Scenic River designation.
- Changes to the character of the river corridor and water quality (color and temperature) due to dam operations make the river ineligible for Wild & Scenic designation.

PUBLIC COMMENT ISSUES OUTSIDE OF SCOPE (cont.)

Wilderness

- The river corridor should receive Wilderness designation to protect and enhance its wilderness values. The NPS should recommend designation as part of the CRMP process (the scope of the CRMP should include Wilderness designation).
- The NPS has been remiss in not following up on the Wilderness proposal before now.
- Designate the river corridor as Wilderness but exclude the Phantom Ranch area; consider removing the structures at Phantom Ranch.
- The river should not receive Wilderness designation. The corridor is not wilderness because of dam operations and high recreational use. Wilderness designation would reduce public access.
- If Wilderness is not designated, at least manage the Colorado River as wilderness (allow a wilderness experience).

Glen Canyon Dam

- The scope of the CRMP should include effects of Glen Canyon Dam.
- Glen Canyon Dam should be operated in the most environmentally and recreationally (e.g., minimum safe flows) sensitive manner possible; NPS should have more influence on dam operations.
- Multiple suggestions were offered for improved operation of Glen Canyon Dam (e.g., lower fluctuations, beach-building flows, drawing warmer water from top of reservoir).

- Dam-caused changes are unnatural and unacceptable (e.g., loss of native fish, loss of wilderness, disruption of sediment flow, loss of camping beaches, cold water temperatures).
- Glen Canyon Dam should be removed to restore the natural river system.
- Glen Canyon Dam should not be removed; preserve species, such as trout, that have taken advantage of the altered river.

Overflights

- Restrict or eliminate overflights.
- Continue overflights.

Miscellaneous

- Comments concerning effects of automobile exhaust and power plant emissions on air quality at Grand Canyon.
- Comments concerning facilities on the South Rim.
- Comments concerning use of mules and conditions on the Bright Angel and Kaibab Trails.
- Comments concerning Diamond Creek Road condition and need for more facilities along the road and at Peach Springs.
- Comments concerning management of Lake Powell and Lake Mead beyond the GRCA boundary.
- Comments concerning tribal boundaries with the Park.
- Comments on proposed federal actions in other locations.