

GRAND CANYON TRUST



COMMENTS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE COLORADO RIVER MANAGEMENT PLAN

November 25, 2005

Introduction

The mission of the Grand Canyon Trust is to protect and restore the canyon country of the Colorado Plateau—its spectacular landscapes, flowing rivers, clean air, diversity of plants and animals, and areas of beauty and solitude. Protecting healthy river ecosystems is an integral part of the pursuit of this mission.

The Grand Canyon Trust played a big role in securing passage of the Grand Canyon Protection Act of 1992 and has sat on the Glen Canyon Dam Adaptive Management Work Group since its inception in 1996, making recommendations to the Secretary of the Interior that benefit Grand Canyon.

We understand, as stated in the Executive Summary of the Colorado River Management Plan, that “the *Colorado River Management Plan* is **primarily a visitor use management plan**,” resulting from a 2002 settlement agreement for the lawsuit, *GCPBA et al. v. Alston et al.* This agreement required the park to address specific issues, including allocation of use between commercial and noncommercial users, and the appropriate level of motorized rafting use.

Because the primary focus of the CRMP is on **recreation management** and the Grand Canyon Trust’s primary focus is on **resource issues**, a lot of the issues addressed in the CRMP are outside the mission of the Trust. However, when resource issues are implicated (for example, when increased visitation results in impacts to the resources) then we need to express our concerns.

Mitigation and Monitoring Are a Must

In the Park Service’s *Management Policies 2001*, **resource conservation is given precedence over visitor recreation**.

Section 1.4.3 of that document states “when there is a conflict between conserving resources and values and providing for enjoyment for them, conservation is to be

predominant.” The park’s 1995 *General Management Plan* states as an objective the management of “the Colorado River corridor through Grand Canyon National Park to protect and preserve the resource in a wild and primitive condition.”

Even though increased recreational use may seem necessary in order to resolve thorny allocation issues, preservation of resources must come first. The park’s preferred alternative H calls for an increase of visitors from the current 22,000 to 26,317. In order to support this visitation increase, the park needs to **implement mitigation measures and consistent monitoring that prevent harm to canyon resources. Sufficient long-term monitoring must be guaranteed so that appropriate mitigation measures can be implemented or visitation reduced as needed to protect resources.**

In several places in the Draft EIS (DEIS) and Final EIS (FEIS), the park uses conditional language with respect to implementation of mitigation and monitoring measures. For example, in the Executive Summary, it is stated: “**Subject to the availability of necessary funding**, the National Park Service will develop a monitoring and implementation plan once a revised Colorado River Management Plan has been approved.”

Conditional language occurs in several of the resource descriptions. For example, in the soils section the DEIS states:

To attempt to reduce impacts to minor to negligible levels, an increase in the number of NPS staff to educate users about soil impacts, NPS patrols at campsites to ensure that river runners did not camp in the old high-water zone, and several more full-time staff to revegetate barren areas and block undesirable multiple trails would be required. This level of mitigation would only be reasonable and attainable in the new high-water zone with an increase in funding and staff. Impacts in the old high-water zone could not be reduced to minor under this alternative, even if increased levels of the proposed mitigations were employed.

Commitment to adequate mitigation measures and monitoring of resources MUST be an integral part of the CRMP. Increased visitation may be the best way to resolve the commercial-private allocation issue, but protection of Grand Canyon resources must come first. Without assurance of mitigation and monitoring, we cannot support the park’s preferred alternative H.

The Park Must Do a Resource-Oriented Plan

Because the CRMP is focused on recreation issues, we feel the park needs to undertake a separate planning process that embraces all of the river resource issues in Grand Canyon. This is consistent with many Park Service mandates requiring the protection of unimpaired natural resources:

The *National Park Service Organic Act of 1916* states that the Park Service “shall promote and regulate the use of the Federal areas known as national parks, monuments,

and reservations, hereinafter specified, by such means and measures as conform to the fundamental purpose of said parks, monuments and reservations, which purpose is to conserve the scenery and natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired.”

The *Grand Canyon National Park Master Plan* states “Preservation of the Grand Canyon natural environment is the fundamental requirement for its continued use and enjoyment as an unimpaired natural area. Park management therefore looks first to the preservation and management of the natural resources of the park. The management concept is the preservation of total environments, as contrasted with the protection of only a single feature or species.”

The *Grand Canyon Protection Act of 1992* requires the Secretary of the Interior to “protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including but not limited to natural and cultural resources and visitor use.”

The CRMP only attends to resource issues connected with recreation. It does not address other river resource concerns such as removing nonnative species, improving the population numbers and habitat conditions for native species—including endangered species such as the Kanab ambersnail, southwestern willow flycatcher, and humpback chub—and reintroducing extirpated native species.

To fulfill the dictates of the above laws and plans, the Grand Canyon Trust urges the park, upon completion of the CRMP, to schedule a planning process specifically focused on Colorado River resources in Grand Canyon, both natural and cultural.