

# **Grand Canyon River Access and the Recreational Use Allocation**

*By Mark Grisham*

*Mark Grisham is the executive director of the Grand Canyon River Outfitters Association, a non-profit trade group that represents each of the licensed river running concessioners that operate in Grand Canyon National Park. This article is reprinted with permission from the Grand Canyon River Outfitters Association.*

In the last several years, how the National Park Service (“NPS”) allocates and distributes the available recreational use of the Colorado River corridor within Grand Canyon National Park has become increasingly controversial. Using the existence of a prolonged wait to receive a private river trip permit as a rallying cry, some private boater advocates seek to increase their level of use at the expense of those members of the public who would choose to take a professionally-outfitted trip.

It is important to understand that the wait is to obtain a trip permit that enables control of an entire river trip, not to actually go on a private trip, which are usually last minute affairs for the majority of the participants. It is also important to note that on average forty percent of those who receive a private permit cancel their trip. Currently, professionally-outfitted use accounts for sixty-eight percent of the available recreational use allocation; self-outfitted use accounts for thirty-two percent. The average professionally-outfitted trip is seven days long and the average self-outfitted trip is eighteen days long. Roughly 19,000 people take a professionally-outfitted trip each year, while about 3,500 participate in a self-outfitted trip.

There are legitimate access issues regarding the way the NPS administers the self-outfitted use program that deserve attention, but a fundamental reality will continue for the foreseeable future: demand for Grand Canyon river trips of all types exceeds the available supply. A central question at issue is, therefore, on what basis does the NPS allocate the available recreational use to the various competing user sectors?

In order to quantify and meter use of the Colorado River within the Grand Canyon, since the early 1970’s, the NPS has employed a “user-day” regulatory system. A person on the river for one day is a user-day. There are presently 169,950 user-days available for recreational use along the Colorado River within Grand Canyon National Park. Of this number, 115,500 are allocated to that portion of the general public wishing to accompany a river trip organized and led by one of the Park’s sixteen licensed river concessioners. These concessioners, who operate under contract with the NPS, are each assigned a fixed user-day allocation, and are required to make this use available on a non-discriminatory basis to the general public, in the form of professionally-outfitted river trip packages.

The balance of the recreational river use allocation, 54,450 user-days, are made available directly by the NPS to those wishing to do a “private” or non-commercial river trip, relying on their own skills and equipment in order to navigate the Colorado River’s world-class whitewater.

## **A HISTORICAL LOOK AT THE ALLOCATION ISSUE**

Until the late 1960s, rafting down the Colorado River through the Grand Canyon was an experience limited to only a very, very small percentage of the population. Then, in response to increasing visitation, the NPS developed the user-day system as a means of administering and protecting the river. The NPS allocated a certain number of user-days to members of the public choosing to use professional outfitters, and a certain number of user-days to individuals running the river on their own.

As an interim measure, the NPS first allotted 105,000 user-days for professionally-outfitted recreational use and 7,600 user-days for self-outfitted recreational use. In 1973, the NPS reduced the allocation for professionally-outfitted use to 89,000 user-days, but maintained the 1972 interim allocation for private use. Although the NPS then recognized that it could set either a higher or lower carrying capacity, the NPS chose this user-day level because it had “observed its impact on the canyon, and no irreversible damage seem[ed] to have occurred.”

In early 1976, following a three-year research program on visitor use and resource impacts, the NPS began to prepare a comprehensive management plan for the river, termed the Colorado River Management Plan (“CRMP”). In the summer of 1976 and the spring of 1977, the NPS’s approach of allocating recreational use via the user-day system was challenged in two lawsuits. Among other relief, the Plaintiffs sought to prevent the NPS from extending or issuing new concession permits, as well as an order directing the NPS to revise the allocation, providing for maximum utilization by private users. In both cases, the court upheld the NPS approach, and on appeal, in a case called Wilderness Public Rights Fund v. Kleppe, 608 F.2d 1250 (9<sup>th</sup> Cir. 1979), the United States Court of Appeals for the Ninth Circuit consolidated the two cases and affirmed the lower court judgments.

In 1979, following an extensive public involvement program, the 1979 CRMP and its accompanying Environmental Impact Statement (“EIS”), prepared in accordance with the National Environmental Policy Act, were released for public comment. The 1979 CRMP provided for significant increases in the number of non-commercial participants, number of trips and user-days. The new total use allocation proposed was to be based on the number of trip launches and group sizes, rather than on a fixed user-day cap, as had been the case in the past. This transition was part of the controversial proposal to phase out motorized use that was also including in the draft plan. In addition, the new numbers reflected a lengthening of the summer season from about four to six months. Based upon an estimated average trip length of ten days for commercial trips and sixteen days in the summer season and eighteen days in the winter season for non-commercial trips, the 1979 CRMP suggested an allocation apportioning 115,500 user-days, or sixty-eight percent, for members of the public contracting with concessioners and 54,450 user-days, or thirty-two percent, for private boaters.

The NPS stated at the time that this the new allocation ratio represented the agency’s “best estimate based on experience and on interpretation of the available data.” These factors included the absence of a means to count the number of potential passengers turned away by concessioners because certain dates are full, duplicate applications for private trips, and false applications for private trips. The 1979 CRMP, however, was never implemented. Instead, Congress responded to the agency’s proposal by passing an amendment offered by Senator Orrin Hatch (R-Utah) to the 1981 Department of the Interior appropriations bill that prevented the National Park Service from moving forward with its proposed phase-out of motorized river trips. In response, the NPS released a revised CRMP in 1981 that adopted the 1979 recommended user-day numbers, a seventy-five percent increase in total annual use over the 1973 level. The NPS’s decision to raise the use level was based on its conclusion that the 1973 use level was not having a significant long-term impact on the river environment.

The 1981 CRMP sought to address private boater concerns by sticking with the earlier recommended 616% increase in user-days for self-outfitted trips (to 54,450 user-days). Professionally-outfitted boaters were granted a 29% increase in user-days (to 115,500 user-days). The NPS stated that these numbers reflected historic use levels, trip length requirements, increases in demand for the private, non-commercial allotment, and a increase for the professionally-outfitted user sector. The NPS further believed at the time that the new commercial to non-commercial ratio of about 2:1 would more appropriately accommodate the demand of river runners for non-commercial trips. In the process of reaching its final decision, the NPS considered various alternatives, including maintaining use at 89,000

professionally-outfitted user-days and 7,600 self-outfitted days, increasing use levels more dramatically, and decreasing use levels.

In March of 1987, the NPS began a review and revision of the 1981 CRMP. During the planning process, the NPS identified and considered a number of possible alternatives for adjusting allocations, including reallocating user-days between “the commercial sector” and “the private sector.” In reviewing and considering the access/allocation issue, however, the NPS found that, while the allocation for professionally-outfitted boaters was being fully utilized, the available allocation for self-outfitted boaters exceeded actual self-outfitted boater use by twenty-five percent. The NPS determined that this under-utilization of the private allocation was due to deficiencies in the private permit system and to the fact that self-outfitted boaters were taking smaller and shorter trips than actually permitted under NPS policy at the time. Consequently, when the NPS issued a final revised CRMP in September 1989, it decided to maintain the levels of use and the professionally-outfitted/self-outfitted allocation from the 1981 CRMP and to improve access for the self-outfitted boating community by addressing the underutilization of the private allocation. It did so by changing aspects of the private permitting system and by modifying certain operational requirements, rather than by reallocating use.

By the end of 1994, the private waiting list, started in 1980, had grown to 4,964 individuals, and the wait for new applicants was estimated at eight years. An internal NPS memorandum noted that “[c]ontinuation of [the] current application/waiting list system will indemnify the status quo and remove any possibility of changing the system for 10 years following the completion of the CRMP review process.” The memorandum concluded that “[t]he current waiting list/permit system has not and is not meeting the requirements of a rapidly growing recreational public and will not improve over time. This system . . . is increasingly the target of complaints due to the unrealistic waiting period.” Unfortunately, little was done at the time to improve the private permit distribution system, despite its growing failure at meeting the needs of the self-outfitted boating community.

In September 1997, the NPS formally initiated the process for revising the 1989 CRMP and began to revisit the allocation issue and the overall growth in demand for river trips. As part of this process, the NPS identified several objectives regarding access and allocation of use: improving access for all who seek a Grand Canyon river trip; evaluating the impacts of current use levels and seasonal distribution of use; and evaluating alternative access systems. Early in this process, Park management observed that, while it would closely evaluate the user-day method of allocating use and explore alternative methods of launch scheduling that might improve public access and protect resources, “[u]se levels and distribution between groups [would] not be arbitrarily adjusted based on perceptions.” The NPS also declared that the allocation of use issue could not and would not be addressed in isolation, but rather determined in the context of other inter-related issues, such as the distribution and volume of use, the non-commercial permit system, the appropriate spectrum of outfitter trips and services, and wilderness management. Park management established workgroups to focus on access and on the distribution and volume of use, and implemented a research program, consisting of a visitor use study, observation, and a computerized trip simulator designed to develop information relevant to making decisions regarding access and allocation of use.

The Park Superintendent put this river management plan revision process on hold in February 2000, however. According to the Superintendent, this suspension of the planning effort was necessitated by a “lack of available fiscal and human resources to complete a comprehensive planning effort,” an “inability to resolve many of the issues prior to resolution of the park’s wilderness recommendation,” polarization among backcountry and river user groups and interests that had intensified to the point of affecting the park’s ability to reach an acceptable resolution, and the existence of other projects of “higher importance” that needed to be accomplished and were competing for the

Park's limited resources. The NPS concluded that it could not accomplish the comprehensive EIS with the available resources and that, given the limited resources, there were higher priority items concerning management of the Park that warranted attention.

The decision to halt the Colorado River Management Plan revision process was controversial, and quickly prompted two lawsuits brought by private boaters and environmental groups challenging the NPS's management of the river corridor. In short, these lawsuits sought a resumption of the planning process, an immediate reallocation of use involving a shift of use from professionally-outfitted trips to privately-outfitted trips, an injunction prohibiting renewal or extension of the existing river-running concessions contracts (which were to expire at the end of 2002) until such time as a new plan could be completed, and the termination of all motorized use on the river. In one of these lawsuits, the parties negotiated a settlement agreement under which the NPS agreed to restart work on the CRMP revision process and implement a revised plan by December 31, 2004.

During the planning process, the settlement agreement requires the NPS to consider, among other things: (i) the appropriate level of visitor use on the Colorado River consistent with resource protection and visitor experience goals; (ii) the allocation of use of the Colorado River between commercial and non-commercial users, the allocation of use between different types of commercial users (e.g., between motorized and non-motorized trips), and alternatives to the current system of commercial/non-commercial allocation; (iii) the impacts of motorized watercraft, potential mitigation of those impacts (including technological improvements to motors), and a reasonable range of alternatives with respect to the current ratio of motorized craft to non-motorized craft; and (iv) the range of services to be provided to the public. This process is now ongoing.

#### **ACCESS AND ALLOCATION – QUESTIONS TO BE ADDRESSED**

Questions regarding access to the Colorado River within the Park and the allocation of its recreational use that the NPS must address in the course of the upcoming river management planning process include:

- How can the resource best be protected and what is the appropriate level of visitor use for the Colorado River corridor within Grand Canyon National Park, given paramount resource protection requirements and very high visitor experience quality goals?
- How should the recreational river use made available be apportioned among competing user groups, including those who seek the services of a licensed river outfitter and those who wish to self-outfit, or conduct their own private Grand Canyon river trip?
- How should private river running permits be distributed? The current "waiting list" system has resulted in excessive and highly unpopular wait times for trip leaders seeking to obtain a permit for their private party. Should forced waits continue as the primary means used by the NPS to ration such permits, or is there a better way? (The waiting list system and its attendant controversy are unique to the Grand Canyon. All other permitted rivers that support multi-day trips in the western United States use some form of a lottery system to distribute private river running permits.)
- What is the appropriate spectrum and mix for the various river trip types or styles to be made available? To what extent should motorized river trips continue to be offered? Motorized trips have been publicly available in the canyon for over the past five decades. Three out of four of today's professionally outfitted river trip participants utilize the motorized trip option.

- How should river trips be scheduled and otherwise directly managed to protect the resource and to produce the best possible on-river experience for the visiting public?

## **NPS LEGAL MANDATES**

How the NPS answers these questions will primarily be a matter of agency discretion. In fact, the NPS has no mandatory duty under any law to allocate recreational use of the Colorado River through the Park. Rather, the NPS must administer the park in accordance with the NPS organic legislation (which created the NPS), the Grand Canyon National Park enabling legislation (which established the Park), and the NPS concession laws. It is the combination of these and other public laws, such as the National Environmental Policy Act, that informs whether and how the river will be allocated among various user groups, such as those seeking professionally-guided tours, those undertaking a scientific inquiry, those who are disabled, and those who wish to participate in their own self-guided trips.

The most significant legislative mandate with respect to management of recreational boating on the Colorado River in Grand Canyon National Park is the NPS Organic Act of 1916. This statute charges the NPS with a dual mandate to promote and regulate the use of the national parks “by such means and measures as conform to the fundamental purpose of parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment for the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

The Grand Canyon became part of the National Park System in 1919, when Congress expanded and upgraded the Grand Canyon National Monument established in 1908 by President Theodore Roosevelt, thereby creating Grand Canyon National Park. The Act of February 26, 1919 “reserved and withdr[ew] from settlement, occupancy, or disposal under the laws of the United States and set apart as a public park for the benefit and enjoyment of the people” land in the State of Arizona under the name of Grand Canyon National Park. The Act further directed that the NPS assume the responsibility for the administration, protection, and promotion of the Park, and required the NPS to grant commercial concessions “for hotels, camps, transportation, and other privileges of every kind and nature for the accommodation or entertainment of visitors.” Act to Establish the Grand Canyon National Park, 40 Stat. 1175, 1177, section 2 (codified at 16 U.S.C. §§ 221 et seq.).

Within the confines of the Organic Act’s dual mandate, the NPS has been given broad authority by Congress to manage parks and to determine what resource use opportunities and levels of use are appropriate on a case-by-case basis.

## **NPS CONSIDERATIONS IN ALLOCATING USE**

Consistent with its broad authority to manage Park resources, the NPS considers a wide range of factors in allocating recreational use. Many who are critical of the current allocation erroneously assume that demand is the only relevant factor for NPS consideration. This assumption, however, ignores the relevant mandates for the NPS’s management of the Park, and also fails to reflect the Park’s long history of administration of recreational use. Demand is only one of many factors that the Park has considered in allocating use of the Grand Canyon’s limited resources.

As required by its organic statute, the NPS regulates the type and amount of river recreation use “to assure that the degree and type of use is sustainable, and that resource impacts are within acceptable limits for long-term resource protection.” The NPS also manages the Park in accordance with the purposes set forth in the 1919 statute that established the Park, which set apart the area as “a public park

for the benefit and enjoyment of the people.” The NPS has explained that “[s]cientific research, public input, historic considerations, and legislative mandates have placed the current levels of commercial and non-commercial user-days at an aggregate level of 169,950” and that it has the right “to add or subtract, allocate or reallocate user-days based on review of all relevant factors.” Accordingly, in addition to demand, Park management has, in the past, based the allocation of use in part on other factors, including: the desired resource protection and visitor experience quality; the condition of the natural and social resources within the river corridor; and historic use levels and their impact on park resources.

Because the allocation is administered “in the interest of the greatest good to the general public,” the allocation has reflected Park management’s long-held belief that concessioners provide the best practical means of access to the river for the vast majority of Americans. Indeed, for thirty years, the NPS has recognized the importance of the professional river outfitters and their irreplaceable role in providing access to a Grand Canyon river experience for the majority of the public. This is why the Park has river concessioners.

In 1975, the head of the NPS’s Division of Visitor Services stated, on behalf of the Interior Secretary, that the NPS recognized that the river concessioners offered “the only means of access” for those “who do not wish to make a sizeable investment in equipment, have no desire to gain proficiency in boating skills or are not acquainted with a boat owner,” and therefore that, “for the majority of Americans, a white water trip is more accessible through a commercial outfitter than by any other means.” The NPS reiterated its position in a 1975 letter from NPS Director to a member of Congress:

*[W]e believe that the commercial outfitters provide the only practical means of access . . . for the vast majority of Americans. The 50 to 50 ratio proposed by a few would be unfair to people . . . who could make a river trip only with an outfitter. No one has an accurate count of the number of private boaters in the country, but certainly it is negligible as compared to the balance of the populace.*

And, in June 1994, the head of the NPS, Director Roger Kennedy, discussing the NPS’s administration of the allocation, explained:

*The present format authorizes private river runners, who are a very small percentage of the interested public, to utilize a fairly large percentage (32 percent) of the total allocation. It does not seem appropriate to make a change because of the requirement to endure a wait on the Private River Runner list. A significant alteration to the allocation would still result in a substantial wait while limiting the number of non skilled visitors who could experience such an activity.*

Thus, he continued, “[t]he opportunities must be evaluated in respect of the recreational desires of all publics in relation to the need for resource protection.” As the NPS Chief of Concessions has stated, then, the allocation decision is “really a question of what is best for the Park and the overall public.”

### **THE “WAIT LIST” IS A POOR INDICATOR OF DEMAND**

The “wait list” for private boaters, highlighted by many who are critical of the current allocation as justification for increasing the non-commercial allocation at the expense of the commercial sector, is neither a sound reflection of private demand nor an indication of relative demand for self-outfitted trips versus professionally-outfitted trips. Moreover, arguments in favor of increasing the non-commercial allocation at the expense of the commercial allocation ignore the fact that demand has no doubt increased for both those interested in professionally- outfitted trips under the auspices of a NPS concessioner and those who wish to acquire a permit and organize their own trip. As the NPS

recognized during the CRMP revision process initiated in 1997, “the demand for access by all members of the public (those who desire self-outfitted trips, and those who desire commercially-outfitted river trips) has increased since the last Colorado River Management Plan revision.”

To the extent that relative demand is a factor considered by the NPS in allocating use, the wait list, as the NPS and other stakeholders have long recognized, is a poor indicator of actual demand for self-outfitted river trips. One of the primary reasons for this is that only the trip leader, rather than the names of all trip participants, is placed on the waiting list. This encourages duplicate applications, where individuals interested in taking a trip together will all put their names on the waiting list, thereby enabling the participants to take multiple trips. In addition, the NPS has observed that a significant percentage of people on the waiting list put their names on the list (or are children whose names were placed on the list by their parents) not necessarily ever planning on taking the trip. All of these factors, according to the NPS, “artificially inflate the non-commercial waiting list and make it a poor indicator of actual demand.” Indeed, in December 1997, the NPS observed exactly how widespread this situation had become: a full twenty-one percent of the names of the waiting list shared either a common address or phone number.

The problem with using the wait list as an indicator of demand for self-guided trips also has been observed by stakeholders in the Park management process. Some, including members of the private boating community, have recognized that people “don’t really have to wait 8 [or ten or twenty] years to go on a non-commercial trip, they only have to wait to be the permit holder” and that a number of people “often go together every 2-3 years by making reverse invitations to each other depending on who gets a permit.” Revealingly, according to a 1998 NPS study, “commercial boaters tend to ‘plan’ their trip in advance longer than private boaters (the majority for commercial boater planned between nine months and two years ahead for the trip while the majority of private boaters planned for one to six months ahead.”) Others have observed that a number of private boaters know how to use the system and go every year, one stating that one of the consequences of the existing wait list system is that boaters not on the wait list “frequently run the river annually.” A January 7, 2000 letter from a private boater to the River District Ranger exemplifies the problem with using the waiting list to infer the level of demand for self-outfitted trips:

*I am the holder of a permit to run a private river trip in the Grand Canyon in May of 2000. . . . Imagine my dismay when I learned that my trip leader was also finally issued a permit . . . . Not only are our permits for the same summer, they’re in the same month! As all of the boatmen of my acquaintance are the same as those he will invite on his trip, it becomes effectively impossible for me to organize my trip as I had planned.*

Statistical analysis of the existing data further illustrates the point. An analysis of publicly-available non-commercial river trip participant lists shows that, between April 16, 1995 and September 6, 2000, more than one out of every ten boaters (11.5% or 1,893 out of 16,467) running the river on a self-outfitted trip went down the river more than once in that five-year period alone, some running the river as many as ten times.

The suggestion that the existence of the waiting list demonstrates that user-days should be taken from members of the public interested in professionally-outfitted river trips and instead allocated to those interested in self-outfitted trips also ignores the fact that demand for professionally-outfitted trips also has increased substantially. An oft-repeated refrain from some in the private boater community is that shifting part of the allocation for professionally-outfitted trips to private boaters must be warranted because, while non-commercial do-it-yourself rafters have to wait for years for a permit, someone interested in a professionally-outfitted trip can purchase one for the next season. The suggestion is that there must therefore be a surplus of professionally-outfitted trips.

The fact is, however, that the commercial allocation is as fully subscribed as practicable. Indeed, evidence shows that demand for professionally-guided trips exceeds availability, and that concessioners have turned away members of the public interested in taking a professionally-guided trip or established extensive waitlists (although very few people on those lists actually gain access due to low cancellation rates for professionally-outfitted trips). As Park management has found, however:

*[T]here is no way of determining how long a person has waited to arrange their schedule or to save enough money to go on a commercially outfitted trip. There may be many people with the desire to go on a commercial river trip, however no list of such people exists, thus they are not being counted. There is also no way of telling how many commercial passengers have been turned away by one or more river concessioner [sic]. The fact that commercial companies turn prospective customers away every year due to allocation limitations would seem to indicate excess demand in that sector too.*

For all of these reasons, it would be wrong to conclude that the mere existence and extent of the wait list for self-outfitted trips demonstrates that the current allocation is inappropriate and that use must be shifted from professionally-outfitted trips to self-outfitted trips. The issue of the proper allocation of the Colorado River resource through the Grand Canyon for boating use is not a simple matter of resolving a dispute between self-guided recreational users of the river on the one hand and “profit-seeking,” commercial interests on the other. Rather, it is a decision that the NPS must make in accordance with its legislative mandates and one that is in the ultimate interest of the public—that is, all the people as well as future generations. As the federal appellate court stated in its decision in the lawsuits challenging the allocation in the 1970s:

*Throughout these proceedings Wilderness Public Rights Fund has persisted in viewing the dispute as one between the recreational users of the river and the commercial operators, whose use is for profit. It asserts that by giving a firm allocation to the commercial operators to the disadvantage of those who wish to run the river on their own the Service is commercializing the park. The Fund ignores the fact that the commercial operators, as concessioners of the Service, undertake a public function to provide services that the NPS deems desirable for those visiting the area. The basic face-off is not between the commercial operators and the non-commercial users, but between those who can make the run without professional assistance and those who cannot.*

## CONCLUSION

The majority of the public that depends upon the availability of professionally-outfitted trips under the auspices of a NPS concessioner could be affected adversely by any allocation decision. In addition, altering the allocation can affect the visitor experience by impacting the frequency of visitor contact, competition for campsites, or attraction site congestion. Consequently, it would be poor public policy, and contrary to law, if the NPS were to merely act as if the matter were simply adjudicating a dispute between only two identified groups.

The Settlement Agreement reached through a cooperative effort by the NPS, Grand Canyon Private Boaters Association, National Parks Conservation Association, GCROA, and others, provides for an open, public planning process that will involve input from a broad range of affected or otherwise interested entities. Pursuant to the agreement, the NPS will review the allocation of use between commercial and non-commercial users of the Colorado River within Grand Canyon National Park. In sum, the Settlement Agreement commits the NPS to update the CRMP and review the allocation of use

between commercial and non-commercial users of the Colorado River within Grand Canyon National Park, in accordance with the agency's statutory mandates, in an open, public manner, and according to a reasonable, fixed timeframe.

In addressing the allocation issue and the issue of access for private boaters, the NPS must manage Grand Canyon National Park in accordance with the purposes established by Congress and in the overall public interest, and not in the interest of any particular group of users. We also must appreciate that the Grand Canyon is a resource that is in very high demand by all types of users, and, as a result, the NPS must allocate and ration its use.

The question of providing increased access opportunities to self-guided river trips through the Grand Canyon involves three distinct issues: (1) establishing the overall size of the recreational use allocation; (2) establishing appropriate criteria upon which to base the apportionment of this use among the various user groups and then apportioning that use accordingly; and (3) designing and implementing a system for distributing and administering such use through the issuance of permits.

The use of any scarce public resource like recreational river use at the Grand Canyon must be allocated among the various user groups. As in any decision to allocate a public resource, it is incumbent upon the managing agency, in this case the NPS, first to identify the overall size of the resource to be distributed. Second, the agency must identify what criteria will govern the allocation of the resource among the various user groups. Third, the agency must develop sufficient information to make an informed, rational, and defensible decision. Finally, the agency must make its decision in accordance with its statutory authority and in consideration of the available information.

It would be inappropriate for the NPS to reduce the number of user-days currently allocated for professionally-outfitted public use in order to improve access to the river for self-outfitted boaters. The vast majority of the American public interested in experiencing the Grand Canyon by river is either not interested or not capable of undertaking such a challenge without the assistance of an experienced professional outfitter. Such professional outfitters ensure that a greater part of the public can experience the excitement of a Grand Canyon river trip.

Solving the access problem faced by private boaters means that the current failure of the private permit distribution system must be addressed. This can only be done by examining alternatives to the existing system, with a view toward exploring whether other alternatives might provide better access to the river for private boaters even given the current high demand that exists for this type of experience. There are ways to provide reasonable access even under intense demand pressures. GCROA believes that a dramatically more effective private trip permit distribution process can and must be designed and implemented. A new private distribution system would vastly improve the situation self-outfitted boaters face today when they wish to obtain a Grand Canyon river use permit.

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