

Grand Canyon Hikers and Backpackers Association
Backcountry Management Plan Comments
June 2011

The following comments are from Grand Canyon Hikers and Backpackers Association (GCHBA) are a summation of interests and issues from the hiking and backpacking community drawn from engagement with a broad segment of that community, consisting primarily of the popular public Yahoo listgroup Grand_Canyon_Hikers@yahoo.com, regular attendance at the annual Guides Training Seminar sponsored by GCA/GCFI, and in the context of GCHBA/NPS service projects, and past representation of hikers on the Grand Canyon Working Group on overflights, as well as numerous GCNP administration, staff, and ranger contacts. Inner canyon hikers are dispersed -- somewhat unorganized and geographically diverse -- and GCHBA is the only formal organization specifically focused on Grand Canyon hikers.

The period of time and changes in use and conditions since the initial backcountry management plan creates a significant absence of opportunity for participation in policy and management issues. During this period, adjustment to plan has been made by various administrative rulings, which has been appropriate to the circumstances, but with less than appropriate public involvement. For this reason, GCHBA requests a 60-day extension of the current scoping process to allow opportunity to expose these issues to a range of participants and create a dialogue between different parties and different viewpoints in the backcountry user community. The current scoping is a good start to the planning process but does not facilitate dialogue between NPS and the public, or between various backcountry user sub-groups with different viewpoints.

These comments summarize a range of viewpoints and issues of general concern in the hiking community and are not presented as a policy statement or formal position of GCHBA at this time.

With respect to broad policy objectives we recommend adoption of the minimum of formal rules or regulation necessary to accomplish objectives -- keeping in mind that the need to allow exceptions to a rule is not uncommon, and the objective of any policy or regulation should be to protect Grand Canyon resources and natural environment from user impacts, not to protect users from the inherent risks of wilderness recreation activities.

Wilderness protection -- Most of the hiking community supports full wilderness protection and designation for the areas below the rim, with NPS operations limited to what is necessary for resource protection and public safety. Continuing the policy of managing these areas as if they had gained formal wilderness status is appropriate protection under the new plan. For some undeveloped areas above the rim, NPS policies and objectives are less clear and should be clarified in the new plan. Trailhead access is often closely related to this subject.

Backcountry zones -- Overall, the way permit zones are divided has been a successful adaptation of the original permit zones, with appropriate administrative adjustments responding to changing demand for popular destinations offering camps near available water with good trail conditions. Some unusually large zones are candidates to be divided into smaller areas. Some of these include AU9 Blacktail which covers portions of the Tapeats Basin and an extensive (but physically unrelated) area to the east. Hikers can be in the same use area without the most remote possibility of encountering the other party or sharing any resource. Similar issues have been identified for BS9 Great Thumb, AR9 Scorpion Ridge, AQ9 Trinity Creek, and AF9 Chuar.

Considering the difficulty of accessing these remote areas, often by traveling through areas with much higher use-demand, it can be problematic for groups with significantly different planned itineraries to access these large zones if their dates overlap but not in the same place.

Trailhead access -- Where trailhead access is from fully developed areas, access is less of an issue. Permitted access/parking to Kaibab Trail is suggested for off-season (winter) –both convenience and safety factors are involved. For undeveloped or marginally developed, or for access across lands other than GCNP, management policy has failed to clearly define specific trailhead access or a specific trailhead location where hikers are assured future access by policy rather than by absence of any action negatively impacting access.

Where NPS fails to formally designate access the hiking community remains uncertain whether a change in policy or other competing interest may arise and alter access. In some cases adequate access may exist but is informally documented and not widely known. Such factors include mapped roads which are closed or have been removed or are impassable, lack of designated parking (subjecting hikers to penalty for unintentional improper parking), closing roads unexpectedly for administrative or budget considerations, lack of cooperative agreements with other agencies or tribal interests. Permitted trailhead access should be considered as an option where access is important to hikers but NPS does not wish to open the location to day- users and uncontrolled access. Some hikers seek improved access or improved road conditions (specifically for South Bass).

Hiker transportation -- Many hikers face a variety of transportation challenges above the rim. These include: hikers arriving without a personal vehicle wishing to hike trails other than the Corridor, hikers not owning off-road vehicles but desiring access to some of the remote trailheads, and hikers wishing to do any of several loops such as, South Bass to Hermit, other sections of the Tonto, or Escalante Route. Public transportation services to cover these needs exist more in theory than in reality. NPS policy has discouraged informal transportation assistance such as private-party arrangements or hitchhiking for some understandable reasons but with the effect of failing to adequately provide for this need.

Backcountry facilities/toilets -- Toilet conditions in some locations have, at times, been extremely bad causing some hikers to avoid using those facilities, defeating the desired resource protection of installing them. Proposals for hikers to pack out human waste seem very progressive from a resource perspective but acceptance seems low and can be expected to be a serious impediment to making any program like this actually work in practice. Costs and methods of maintaining toilets in some locations should give a balanced consideration to the necessity of achieving effective resource management.

Commercial guides -- Hikers should have the option of guided hikes if/ when/where they desire or prefer. Commercial guiding services should not have advance booking or privileged access to reservations for permits without a designated client list showing there is a need for those services. The present regime is effective in managing demand for access if adequately enforced. Especially in considering that self- guided hiking has been and still is the predominant model for backcountry users, permits must remain available to the general public on an equitable basis closely tracking variability in public or commercial preference. We do not support guiding concessions or commercial allocations for backcountry use.

Packrafting and river crossing -- Due to the broad range of activities and options, and confusion of terminology, we prefer "floatation assisted hiking or backpacking" rather than packrafting as hikers are not river-users and there may or may not be any actual "raft" involved. This has become an increasingly

popular activity although still relatively uncommon. There is a degree of competition along the river due to high demand for commercial and non-commercial river-running. Permitted hikers share the river zone and camping areas out of necessity due to this arid landscape. The river is also a barrier for hikers seeking to reach remote wild areas on the north side. Generally, hikers would travel briefly on the river only to the extent necessary and are not using the river for transport or recreation.

There have been rumors of new restrictive regulation of hikers use of the river and beach areas, travel restrictions other than defined by the permit zones, or equipment requirements for hikers making a river crossing. Hikers access to the river and to beach areas is integral to any hiking, and restrictions on camping along the river would be inappropriate, forcing hikers away from critical water access, into areas where camping would increase resource impacts, and creating potential conflict or hazard which has not appeared to be problematic to any degree up to the present. It is desirable for the permit process to indicate and track when parties have trip plans that require them to be on the river regardless of the distance, location, or means of travel. The permit issued should show that intention whenever the trip itinerary involves hitching a ride or using any type of personal floatation equipment. It would be most appropriate for the suitability of any methods (other than briefly joining a permitted river party) to remain at hiker discretion.

Range of backcountry activities – Various categories of use include: dayhiking, backpacking, trail-running, canyoneering, caving, packrafting, rockclimbing. Each category of use has its specific techniques and technologies and a continuing evolution of knowledge, skills, and equipment. Regulation of hiker activities and equipment in general (when unrelated to resource protection) should not be included within scope of plan development. Each of these different categories of backcountry users can have significantly differing priorities, expectations and needs. The backcountry management plan must not, without specific justification (such as resource-related) either favor or impair any category of use.

Coordination with adjacent tribal areas -- Hikers are often subject to a great deal of confusion about adjacent tribal lands, access, and permits. Access across the corner of the Havasupai lands on the road to Pasture Wash is identified as an issue of concern to many hikers who sometimes report uncomfortable encounters tribal agents there.

Hikers who desire to access GCNP backcountry areas near Great Thumb often fail to get a requested permit or any response at all from tribal offices. Scheduling and obtaining multiple permits for access across Navajo tribal lands to the Marble Canyon area is generally successful but complex. Interpretation of tribal rules for various activities such as road use, camping, hiking can be inconsistent with how hikers understand those activities, or even inconsistent between different encounters with tribal agencies. For hikers wishing to access areas in western GC adjacent to Hualapai lands the situation ranges from uncertain to impossible. It would be beneficial to hikers for NPS to improve information available to hikers and/or negotiate a coordinated permit process. At the same time, it is understood that NPS relationship with various tribes cannot always be transparent to hikers, that tribal agencies will guard their prerogative and sovereignty, that tribal priorities and policies differ significantly, and that issuing permits is a desirable source of income and employment.

Dayhiking and rim-to-rim hiking -- The past policy of allowing unlimited dayhiking without a permit may no longer be viable management policy at GCNP. The factors influencing this comment include the significant number of serious incidents, searches, rescues, and fatalities associated with dayhikers, the increasing number of rim-to-rim seasonal adventurers, and the deceptive ease of descending further into the depths of the Canyon than is appropriate for many first-time visitors -- or specifically, tourists

who are not really hikers. Also, on specific dates overuse of the rim-to-rim trail system is now evident. Suggestion is to require a permit or registration in some form for any person going below the Redwall on any hike for any period. Where appropriate for resource management there should be a permit limit specified.

Bike access on roads and trails above the rim -- For some trails and any roads that are closed to public vehicular travel but are maintained for maintenance, patrol, or fire response, those roads should be considered for allowing bicycles. This policy would serve an important recreational need, diversify visitor opportunity and experience, and further encourage visitors to bring their bikes to the Park, improving Park traffic congestion and air quality.

Arizona Trail canyon crossing -- Some special provision for permit reservation or availability for AZT through-hikers would make sense. Permits just for crossing GC are not easily had, but coordinating such a permit for AZT hikers is quite problematic and serves to discourage hikers who might otherwise wish to complete the AZT.