

Comments on Grand Canyon National Park
Environmental Assessment
April, 2010

The purpose of this EA is to examine environmental impacts associated with the proposal to make changes to stock use and mule operations in Grand Canyon National Park. Changes proposed include lowering the number of commercial, visitor mule rides from South Rim into the canyon; addition of a South Rim, above-rim, commercial mule ride; establishment of limits for North Rim commercial, visitor mule rides; elimination of commercial stock use below Supai Tunnel, and use of an adaptive management strategy for future stock use in the park. This EA is proposing Alternative B as the preferred choice.

Trail Conditions: The Park's trails have deteriorated for over 60 years, since their initial construction, and annual budgets have not been sufficient to complete preventative maintenance. As a result, the park is faced with a \$24 million dollar backlog of trail maintenance on Corridor Trails. Significant portions of the park's main Corridor Trails are deeply rutted and eroded. The condition of these trails is, to a large extent, from stock use. In addition, support walls and structures need to be upgraded or rebuilt to improve safety conditions for both hikers and stock users alike.

Visitor Conflicts: The Park's General Management Plan directs that "Where livestock and visitors share the same trails and areas," the park should, "minimize conflicts and resource impacts, and enhance safety." The park has received complaints regarding trail conditions and mule waste. In addition, both stock users and hikers have expressed concerns regarding safety of stock users, lack of knowledge regarding trail etiquette from some hikers, and discourtesy from stock users.

Stock Facilities and Infrastructure: Several Stock-related facilities are in need of upgrades or relocation. Examples include the GMP-directed relocation of concessioner mule operations from the historic South Rim mule barn to a new location, and the need for improved facilities for overnight private stock use in the canyon.

Comments regarding the above information:

It is apparent that this EA is slanted primarily toward the concerns of the hikers and is designed to dramatically reduce the mule rides to the inner canyon, if not the first step in the direction of completely eliminating the mules. This assessment is flawed because the hikers have not been included in this process. There are approximately 20,000 stock use days per year and over 200,000 hikers annually.

Alternative B (preferred) eliminates all day rides to the inner canyon (Indian Gardens and Plateau Point). This has been the most popular ride of all as it is spectacular and beautiful averaging over 4900 riders annually. This data is from the park service records. By taking away that experience of riding into the canyon, no longer will the elderly, handicapped and those no longer able to hike the inner canyon be able to enjoy being in the canyon. This ride uses the Bright Angel Trail and by eliminating the inner canyon day ride and limiting the overnight to Phantom Ranch to 10 riders per day, the Bright Angel Trail is basically going to be for the hikers. The proposed rim ride from Yaki Point east to Shoshone point with a limit of 40 rides per day is not along the rim, but for the most part a ride through the forest. You would be hard pressed to make this a two hour ride and then only a look out at the canyon.

Has any evaluation of any adverse impact by age, gender or disability been factored into alternatives that result in fewer mule and horse trips into the canyon? Has any profile of hikers, whose use of the trails will continue unlimited, been conducted to see if these proposed changes unfairly favor one class of users over another? It is entirely possible that any move to limit mules and stock animals constitutes discrimination against these protected classes and violates the Americans with Disabilities Act.

Some local official and park management are clear advocates for their own recreational preference of hiking. Restrictions on hikers are not under consideration. Some recreation managers and government officials openly advocate and exercise bias when it comes to approving use of trails on public lands. Recreation and public land managers have a clear responsibility to remain neutral in judgment with regard to the various means of recreation. Were the park officials really that concerned about the

environment they would not have taken 60 years to begin to address the deferred maintenance on the trails. This is a false argument.

Deferred maintenance costs on Corridor Trails are estimated at approximately \$24 million. On an annual basis \$1.5 to \$2 million is spent to maintain GRCA trails; the majority on Corridor maintenance costs. However, the NPS estimates \$3 million is needed to prevent further increase in deferred maintenance costs. Therefore, the park is short at least \$1 million annually for routine trail maintenance. Per Rick Goepfrich, Trails Field Supervisor, there should be 50 people working on the trails this season. They use ACE (American Conservation Experience) and Coconino Rural Environment Corps (CREC) to help the park service trail maintenance crew.

The concessioners offering mule rides have operating plans that specifically address removal and clean-up of mule waste on trails. Under these plans, concessioners are required to eradicate urine pools and remove manure from trails. In addition, concessioners' operating plans may require trail maintenance, snow and ice removal, insect control, and documentation of these actions. The South Rim concessioner, currently Xanterra South Rim, LLC, has a four-person trail crew. The overwhelming amount of trail work has this crew working more on maintaining the trails than clean-up.

On the North Rim, the concessionaire should be allowed to continue to go down the North Kaibab Trail to Supai Tunnel and Roaring Springs. I do believe a cap of 40 riders to Supai Tunnel and 10 rides to Roaring Springs daily allows for an excellent mix for the North Rim concessioner.

It is my suggestion that after all the facts are on the table that we recommend Alternative A (no action) for the South Rim Commercial and Alternative A (no action) for the North Rim except for the North Kaibab Trail where the conditions in Alternative C should be moved in to replace A.

I can see where Ben Tennison (Western Mule Magazine) said that Alternative B is the beginning of the end for the mules at the Grand Canyon.

Private Stock Use:

Private stock use from 2002 to 2008:

Average number of stock use permits per year – 13

Average number of stock per group – 4

Average number of people per group – 3

This is an average 49 riders and 56 stock days below the rim per year.

There is a need for improved facilities for private stock camping below the rim.

An alternative to eliminate overnight private stock use was initially considered because this use is quite low on an annual basis and because private stock facilities at Phantom Ranch and Cottonwood are not completely adequate for stock or people. The inadequacy of these facilities includes limited size of the campsites and hitching rails, lack of stock pens, and lack of shade. However, because this type of use does not measurably impact trail conditions or other park resources, the NPS determined overnight private stock use should continue. Private overnight stock use is addressed under all alternatives in this document, and elimination of this use was dismissed from further evaluation.

The Arizona Trail that stretches 807 miles from the Utah border to Mexico goes through the Grand Canyon National Park. The normal route N to S is down the North Kaibab Trail and up the South Kaibab Trail and vice versa when heading North. The Bright Angel Trail is now being used while the South Kaibab Trail is under reconstruction.

My recommendation is Alternative A (no action) because the private stock use is minimal at best. There is no need at this time to establish limits. Appendix A would be the guideline for private stock use.

I believe that the ultimate plan is to move the commercial and private stock over to the South Kaibab Trail and leave the Bright Angel for the hikers. I strongly oppose this, as a horseman, I should be able to use all the trails suitable for stock in the park.

The Adaptive Management Concept proposed for stock use, after implementation of the selected alternative, is a systematic approach intended to manage concerns such as deteriorated trail conditions, increased deferred maintenance costs, conflicts between trail users, and accidents and injuries of stock, stock users, and hikers. If needed, additional limits on stock use could be phased-in over a number of years, as park staff monitors trail conditions, costs, and visitor experience to determine the best course of action to take next if the lowest level of action is unsuccessful. This paragraph gives the Grand Canyon National Park the license to gradually phase out all mules and private stock use in the future.

Yes, the mules, private stock and also the hikers contributed to the poor and eroding condition of the trails, but the real cause is the failure of the National Park Service to carry out their responsibilities for trail maintenance for decades.

I would like to thank the following people for their dedication to this effort and their valued comments:

Denny and Sara Murray, Kelly Schwartz, Jim Parrish, Gayle Higgs, Ron Clayton and Jeff Chapman.

Submitted by,
Jim Higgs, National Director Arizona
Back Country Horsemen of America

Barry, Dennis and Terry, I got this e-mail today and thought it had some good info in it and thought I would pass it on to you all. Jim

Hi Jim and Gayle,

I had a chance to talk with Barclay Trimble, Deputy Superintendent at Grand Canyon. He provided the following information:

- Grand Canyon National Park received over \$18 million in stimulus money, of this total, over \$10 million was received for roads, and approximately \$2 million for trails (\$550,000 for Corridor Trails and \$495,000 for North Rim trails). The park did not reclassify roads as trails, instead the park received money specifically for roads.

- Last year, between \$1 and \$1.5 million in user fees were spent on maintaining the park's Corridor Trails

Please let me know if you need additional information.

Thanks,
Rachel

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