final
environmental statement

PROPOSED
WILDERNESS CLASSIFICATION

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12/7/73

GRAND CANYON COMPLEX

ARIZONA

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Grand
120.01
ENV-600
G751
21039
28
INT 0101-fes

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DEPARTMENT OF THE INTERIOR

FINAL

ENVIRONMENTAL STATEMENT

PROPOSED WILDERNESS CLASSIFICATION

GRAND CANYON COMPLEX

ARIZONA

FES 73 - 68

Prepared By
Grand Canyon National Park
Department of the Interior
National Park Service

Raymond L. Freeman
Acting Director

DEC 7 1973

6003
(Book # 2)

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7-9-76
Supt's
office

SUMMARY

( ) Draft (X) Final Environmental Statement

Department of the Interior, National Park Service,
Grand Canyon National Park, Arizona

1. Type of Action: ( ) Administrative (X) Legislative

2. Brief Description of Action: To designate as wilderness 512,870 acres of the Grand Canyon Complex in Mohave and Coconino Counties, Arizona. In addition, 86,156 acres are proposed as potential wilderness addition to be added to the wilderness by the Secretary of the Interior at such time that the lands qualify.

3. Summary of Environmental Impact and Adverse Environmental Effects: Wilderness designation will restrict management prerogatives and will limit development of visitor facilities to remaining areas of the park. The action will provide increased protection from encroachment by man, and will have no adverse impact on the natural, archeological, or historical resources of the area. Wilderness designation may affect development of potential dam sites within the Grand Canyon Complex.

4. Alternatives Considered:

a. No wilderness designation
b. Designation of smaller areas as wilderness
c. Designation of larger areas as wilderness
d. Additional potential wilderness designation

5. Comments Have Been Requested and Received from the Following:

Department of Agriculture
Forest Service
*Soil Conservation Service
Department of the Interior
*Bureau of Indian Affairs
*Bureau of Land Management
*Bureau of Mines
*Bureau of Outdoor Recreation
*Bureau of Reclamation
*Bureau of Sport Fisheries and Wildlife
*U.S. Geological Survey
*Federal Power Commission
*Arizona State Clearinghouse
State Historic Preservation Officer

6. Date Made Available to CEQ and to the Public:

Draft Statement: September 19, 1972
Final Statement: DEC 7 1973

*Comments Received and Attached.

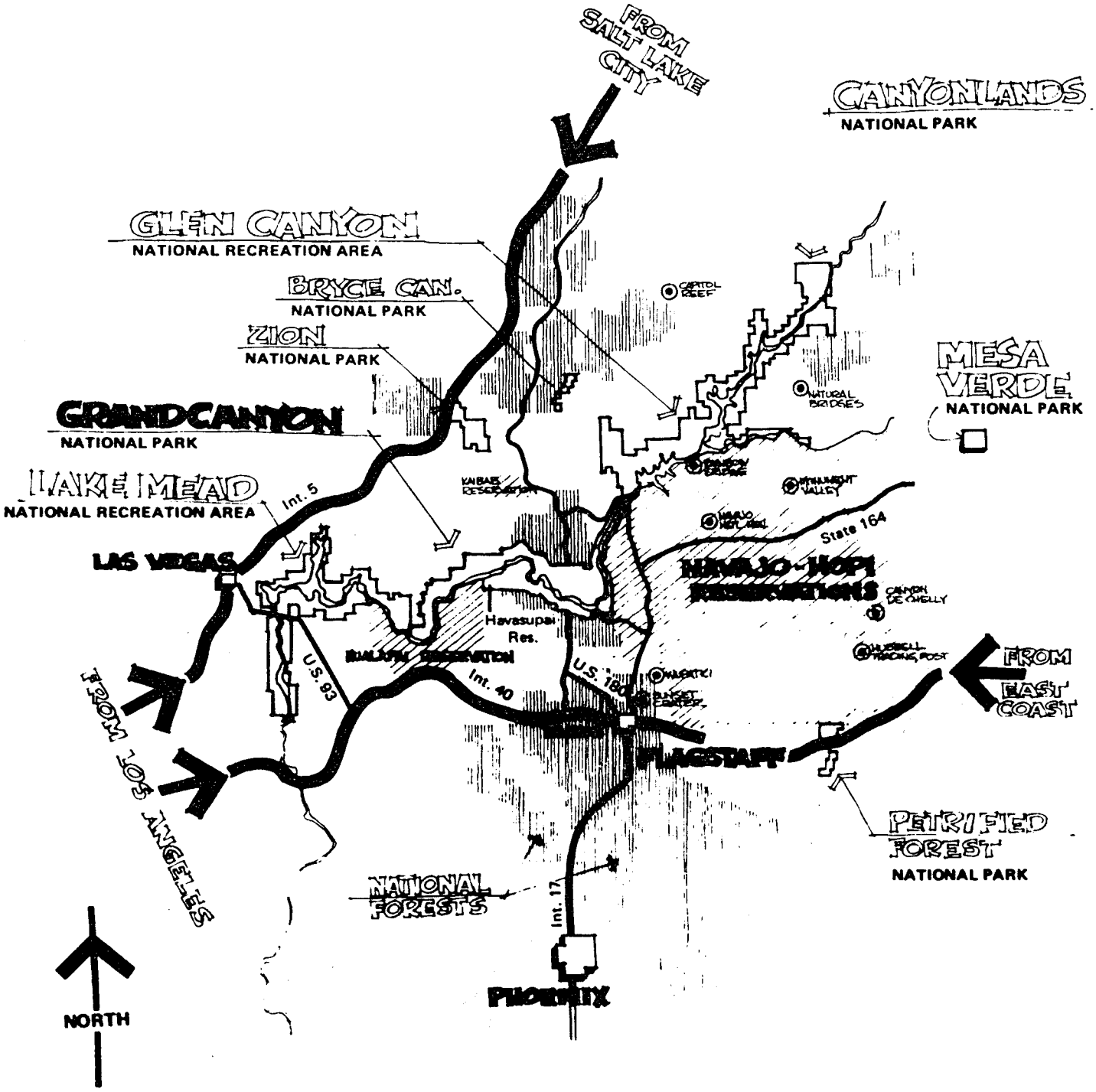
1. DESCRIPTION OF THE PROPOSAL

The Grand Canyon of the Colorado is an enormous chasm incised by the Colorado River into the rugged plateau country of northern Arizona. The most spectacular section of this canyon lies within the Grand Canyon Complex - the coterminous National Park Service lands in Grand Canyon National Park and in Marble Canyon and Grand Canyon National Monuments. Although viewed yearly by millions of people, the major portion of this world-famous canyon has been naturally protected from the inroads of civilization by its rugged and nearly inaccessible terrain. In recognition of its natural wilderness values, the Department of the Interior recommends wilderness designation for 512,870 acres of the 897,935 acres within the Grand Canyon Complex. This recommendation is under provisions set forth in the Wilderness Act of 1964, Public Law 88-577.

Public hearings on the preliminary wilderness proposal for the Grand Canyon Complex were held in Phoenix, Arizona on May 15, 1971, and in Grand Canyon National Park on May 18, 1971. Detailed descriptions of the wilderness units and associated proposed actions were presented in the document "Wilderness Recommendations, Grand Canyon Complex," U.S. Department of the Interior/National Park Service, September 1972. This document also includes governmental agency and public response to the preliminary wilderness proposal presented at the above-mentioned hearings. The preliminary proposal is delineated on Exhibit C of this impact statement, and is considered as a less-wilderness alternative to the present proposal which is depicted on Exhibits A and B. Roadless areas within the Grand Canyon Complex are shown on Exhibit C, and alternative proposals for wilderness designation are shown on Exhibit D.

The proposed wilderness area consists of six separate parcels of land within the Grand Canyon Complex:

> Unit 1: This proposed 136,400-acre wilderness comprises the Marble Canyon and Granite Gorge areas between Navajo Bridge and Bright Angel Creek, on the north and west side of the Colorado River, a long, narrow strip of land on the western side of Marble Canyon, and a larger area below Cape Royal on the North Rim. The wilderness line is generally on natural features, such as canyon rims, along the Colorado River, on ridges, and along streams.
>
> Excluded from the recommendation are about 326 acres of patented mining claims near Sockdologer Rapids and the State land in Marble Canyon. The National Park Service is actively negotiating to acquire these mining claims (which have not been worked in more than 20 years), so that they may be included in the wilderness.



REGIONAL MAP

Unit 2: Unit 2 consists of 63,720 acres in the southeastern portion of the complex, extending from the Cross-Canyon Corridor east to the Little Colorado River and thence northward along the east side of Marble Canyon. Except for the plateau lands above the Palisades of the Desert, northeast of Desert View, all of the area in this unit proposed for wilderness classification is below the canyon rim.

Unit 3: This unit contains 158,000 acres of the canyon lying between the North Rim and the Colorado River, and between the Cross-Canyon Corridor on the east and the Tapeats Creek on the west.

Unit 4: Unit 4 is a linear wilderness of 136,740 acres extending along the south side of the Colorado River from the Cross-Canyon Corridor to Tuckup Creek, and bounded to the south by the South Rim of the Grand Canyon.

Unit 5: This unit consists of 14,580 acres which lie between the north bank of the Colorado River and the Esplanade Rim which is at an approximate elevation of 3,900 feet. The land is an irregular swath lying entirely within the present boundaries of Grand Canyon National Monument from Kanab Creek on the east to Lake Mead National Recreation Area on the west.

Unit 6: A 5,430-acre wilderness area is proposed in the western portion of the Grand Canyon National Monument, encompassing the primitive forested lands of wilderness quality in the Mount Emma area. The land is entirely above the rim of Grand Canyon. The north and east boundaries of this unit are drawn in consideration of grazing allotments and private lands in this generally roadless area, and the west and south boundaries conform to the boundaries of the national monument.

The six units proposed for wilderness status are being managed as primitive areas; thus, wilderness classification will not significantly change present land-use or management practices.

It is recommended that a special provision be included in the legislation to establish wilderness areas in Grand Canyon National Park, which would create potential wilderness status for certain lands within the park. These lands are of wilderness caliber, but are either presently privately owned or have nonconforming use on them. The special provision would give the Secretary of the Interior the authority to designate these lands

as wilderness at such future time as he determines the land qualified as wilderness. All of the lands being recommended for inclusion in the potential wilderness classification adjoin lands presently being recommended for wilderness designation.

Two of the areas recommended as potential wilderness additions cover 57,600 acres in Grand Canyon National Monument. These lands are being grazed under lifetime permits and several sections of land are privately owned and must be acquired by the National Park Service prior to wilderness designation. Three acres on the North Rim of Grand Canyon National Park are recommended for potential wilderness designation. These areas consist of 28,230 acres which are undergoing an intensive resource management program of controlled burning to reduce the heavy buildup of hazard fuel and to restore the forest to a state of normal ecological succession. Existing roads within these three areas will be utilized for motorized equipment and vehicles necessary for the management program, and motorized equipment will be used to clear fire breaks. As the management program progresses, these areas can revert to their wilderness character, and roadways will be abandoned and closed to vehicular traffic.

A 326-acre tract of private land adjoining Wilderness Unit 1 near the Colorado River is recommended for potential wilderness status and for full wilderness status as soon as the land is acquired by the National Park Service.

The Havasupai Indians are faced with the problem of a growing population and a limited and isolated land resource. The Indians utilize portions of the park and monument areas for grazing cattle and horses. On the northern portions of the Great Thumb and Tenderfoot Plateau areas, this domestic grazing conflicts with prime desert bighorn sheep habitat, which is essential to the existence of the bighorn in the park.

To assist the Havasupai in implementing their desire for a greater land base and an opportunity to better control their own social and economic life, others have proposed that about 15,000 acres of land on the Tenderfoot Plateau in Grand Canyon National Monument, and about 41,000 acres in the Manakacha-Topocoba area of Grand Canyon National Park be transferred from National Park Service jurisdiction and incorporated in an enlarged Havasupai Reservation. The National Park Service has stated that additional study is required before the Department can make a recommendation on this proposal. The Department has stated that it intends to make such a study in cooperation with the Department of Agriculture. The Department has requested that, in the meantime, these lands be retained under National Park Service administration. The scheduled study could, of course, conclude, and make a recommendation that, these lands or a portion of them, subsequently be transferred to the Havasupai Tribe. Until such study and recommendations are completed, the existing grazing privileges

of the Havasupai Tribe within Grand Canyon National Monument and Grand Canyon National Park will continue. Because of these grazing privileges and the pending study of the disposal to be made of these lands, they were not recommended for wilderness designation.

The wilderness recommendation is interrelated with the Grand Canyon Complex Master Plan and resulting boundary proposal. The Master Plan will recognize the wilderness recommendation and will contain no conflicting issues. The boundary proposal will also take into account the wilderness proposal regarding lands recommended for addition or deletion. The boundary proposal recommends that the reclamation provision in the act of February 26, 1919, which set aside certain water impoundment withdrawals, be repealed. The request for this change will be included as part of the action on the Master Plan recommendations. The wilderness recommendation is interrelated to this requested change in the act.

Nonwilderness lands will continue to be managed to complement the wilderness resources by supplying accommodations, information, and access for wilderness trips. Major viewpoints on both the North and South Rim offer opportunities for the visitor to enjoy vistas of the wilderness with no impact on the wilderness. Under existing conditions, less than 2 percent of visitors to the area travel into the areas recommended for wilderness. For the majority of park visitors, therefore, one of the key attractions of the park is the scenic grandeur of the canyon as viewed from a rim overlook. The proposed wilderness designation will afford increased protection for this vista.

For visitors who are unable or unwilling to hike into the wilderness, commercial river trips will continue to provide access through the center of the wilderness area. Additional access to the fringes of the wilderness is available by mule rides in the Cross-Canyon Corridor. Each of these activities allows the nonhiker to visit portions of the canyon similar to those areas included in the wilderness. The "heart" of the canyon, the Colorado River and the Inner Gorge, have not been reserved for the exclusive use of the hiker and backpacker.

The Cross-Canyon Corridor, which connects the North and South Rims of the canyon, has been excluded from wilderness. The trails contained within this corridor are well maintained and provide water, emergency telephones, and several developed campgrounds. These facilities allow the inexperienced hiker who is in good physical condition an opportunity to experience a canyon hike with a minimum of risk.

Information will be provided to wilderness visitors about trails, campsites, and possible problems associated with wilderness travel. Wilderness designation may help to control use of these portions of the park where the environment can present a hazard to the inexperienced or uninformed.

Other activities and services, such as scenic aircraft flights, recreational vehicle camping, bus tours, and overnight accommodations, will continue to be available in the park. The proposed action, therefore, will not unduely limit the wide range of activities available to the park visitor.

ACREAGES

GROSS ACREAGE	897,935
GRAND CANYON NATIONAL PARK	673,575
GRAND CANYON NATIONAL MONUMENT	198,280
MARBLE CANYON NATIONAL MONUMENT	26,080

LEGEND

EXISTING PARK BOUNDARY

WILDERNESS AREA LINE

MAJOR ROADS

MINOR ROADS

TRAILS

PRIVATE LAND (P)

UNIT	WILDERNESS
1	136,400
2	63,720
3	156,000
4	136,740
5	14,580
6	5,430
TOTALS	512,870

POTENTIAL WILDERNESS ADDITION 86,156

North

0 5 10 15 20

scale in miles

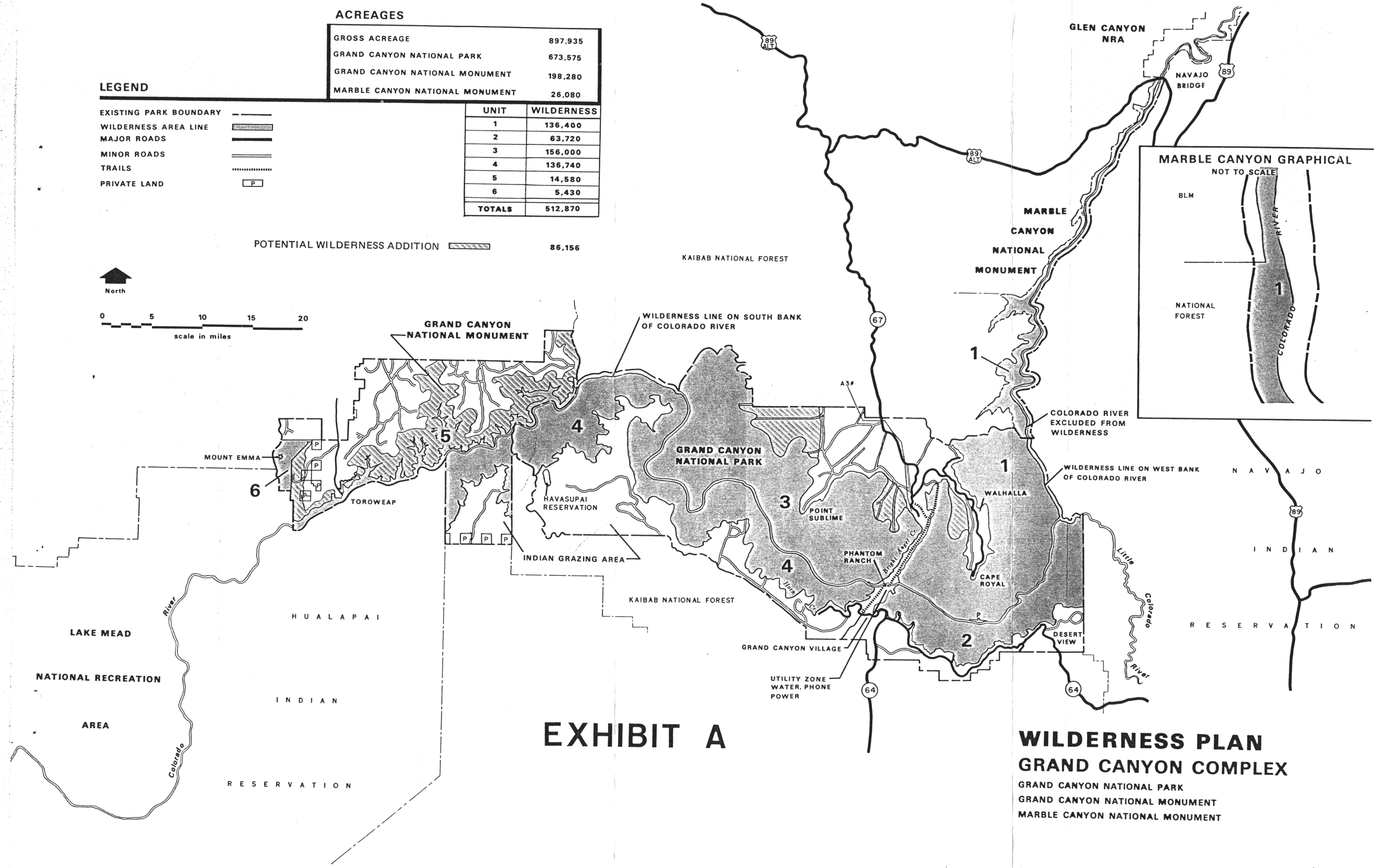


EXHIBIT A

WILDERNESS PLAN
GRAND CANYON COMPLEX

GRAND CANYON NATIONAL PARK
GRAND CANYON NATIONAL MONUMENT
MARBLE CANYON NATIONAL MONUMENT

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ACREAGES

GROSS ACREAGE	897,935
GRAND CANYON NATIONAL PARK	673,575
GRAND CANYON NATIONAL MONUMENT	198,280
MARBLE CANYON NATIONAL MONUMENT	26,080

UNIT	WILDERNESS
1	136,400
2	63,720
3	156,000
4	136,740
5	14,580
6	5,430
TOTALS	512,870

LEGEND

- EXISTING PARK BOUNDARY
- WILDERNESS AREA LINE
- MAJOR ROADS
- MINOR ROADS
- TRAILS
- PRIVATE LAND (P)
- DELETIONS D
- ADDITIONS A,B,C

POTENTIAL WILDERNESS ADDITION 86,156

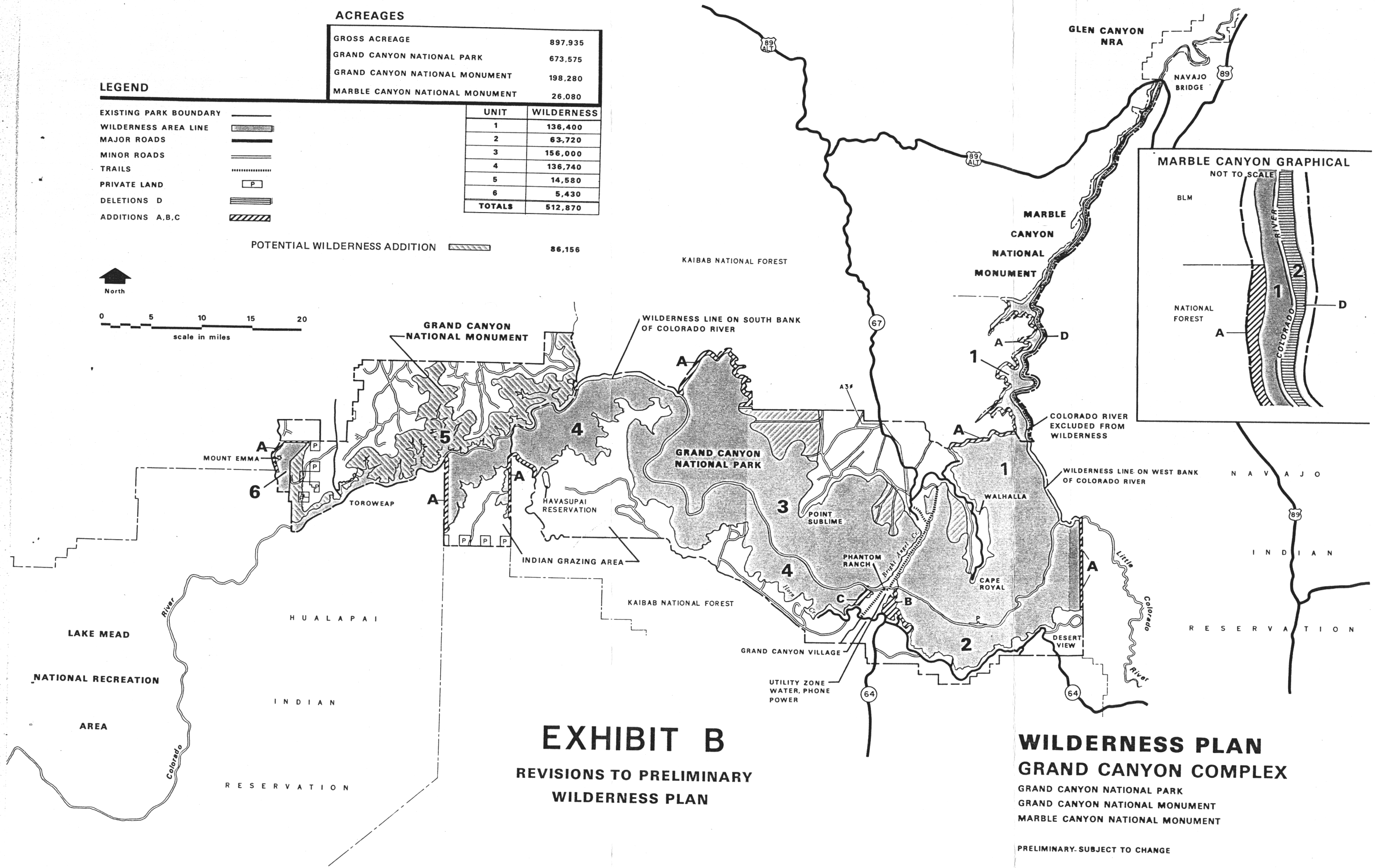

EXHIBIT B

REVISIONS TO PRELIMINARY WILDERNESS PLAN

WILDERNESS PLAN

GRAND CANYON COMPLEX

GRAND CANYON NATIONAL PARK
GRAND CANYON NATIONAL MONUMENT
MARBLE CANYON NATIONAL MONUMENT

PRELIMINARY- SUBJECT TO CHANGE

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2. DESCRIPTION OF THE ENVIRONMENT

The 897,935 acres of the Grand Canyon Complex lie adjacent to the Colorado River in northern Arizona. The complex extends for 180 miles along the Colorado River, from Navajo Bridge near Lees Ferry, Arizona, to a point just beyond Lava Falls Rapids in Grand Canyon National Monument. The complex, thus, extends east-west across the southern portion of the Colorado Plateau which is a vast, semi-arid land of raised plains and basins.

Most of the land on the north and south boundaries of the complex is administered by the U.S. Forest Service or the Bureau of Land Management. The Navajo Indian Reservation forms the eastern boundary of the complex and the Hualapai Indian Reservation abuts the complex on the southwest. Lake Mead National Recreation Area adjoins the complex along its western boundary. The Havasupai Indian Reservation consists of 518 acres within the boundaries of the complex, 35 miles west of Grand Canyon Village.

Archeological resources in Grand Canyon consitutue a primary scientific and historic value of the park. The more than 1,000 Indian ruins within the complex indicate and represent the adaptation of man to his environment over the past 4,000 years in the Grand Canyon region. The initial occupation of the canyon began about 4,000 years ago, and is represented by Desert Culture/Pinto occupation of dry caves. These deposits contain split-twig figurines which are found only in a few other locations in the southwest. An apparent lull in human occupation followed, with primary occupation in the canyon occurring between A.D. 700 and 1200. During this time, Anasazi to the north and east, and Cohonina to the south and west, used first the plateaus and then the depths of the canyon for their agriculturally based way of life. In the historic period, evidence of periodic pilgrimages of the Hopi, and brief settlement by the Havasupai, Hualapai, and Paiute was the only use of the canyon by the surrounding Indian tribes. These various cultures all left evidence of their life styles upon the land, but only the Havasupai still remain within the boundaries of the Grand Canyon Complex.

The archeological resources within the areas proposed for wilderness classification can be expected to contribute significantly to problems such as the following:

1. The sequence of occupation and past climates represented in dry cave deposits;

2. Effects of the canyon as a barrier to movement in prehistoric times, and the results of contact between the Cohonina and the Anasazi;

The Grand Canyon is a geologic timepiece that is studied by both scientists and hobbyists and it is a scenic spectacle that is enjoyed by the general park visitor. The exposed rock layers represent all of the eras of geologic time and contain evidence of the evolution of life through 600 million years of earth history. The rocks of the Inner Gorge have been dated as nearly 2,000 million years old and, thus, the visitor metaphorically comes face to face with the beginnings of time.

The mineral potential of the areas proposed for wilderness is not known in any detail. The first American prospectors on record entered the Grand Canyon in 1874, and hundreds of claims were located by prospectors between then and the creation of the national park in 1919. Small deposits have been found of silver, gold, lead, uranium, vanadium, copper, tungsten, molybdenum, antimony, salt, kayanite, selenium, tellurium, guano, and asbestos. In most instances, the low tenor of the ore bodies and their limited extent, coupled with the lack of water and difficulty of transportation, has prevented any significant amount of mineral production from Grand Canyon. The only mine which has produced a significant amount of ore has been the Little Orphan uranium mine on the South Rim, which is not in an area proposed for wilderness or potential wilderness consideration.

The 217-mile long Grand Canyon ranges from 4 to 18 miles in width and up to 1 mile in depth. Elevation ranges from 1,700 feet at the western portion where the Colorado River enters Lake Mead, to 9,165 feet on the North Rim. Precipitation varies from 10 inches in the Inner Canyon to 16 inches on the South Rim to 25 inches on the North Rim.

The whitewater, wilderness experience of running the Colorado River through Grand Canyon National Park has become increasingly popular in recent years. In 1972, there were 89,000 visitor/use/days used by commercial boat operators, and 7,600 visitor/use/days used by private parties. This amounts to approximately 14,000 visitors who used the river resource in 1972. Beginning in the 1973 season and extending through the 1976 season, a new River Management Plan will keep river use at or below this level. This plan proposes to scale down river use to 55,000 visitor/use/days and to phase out the use of motors on the river by 1977.

Beginning with the 1973 season, strict standards of safety, sanitation, licensing, and interpretation will be maintained by all commercial river operators. The maximum commercial/use/days allotted each month will be no greater than 25 percent of the operator's annual allotment. A maximum of 200 commercial passengers, and one party of up to 30 private users will be permitted to depart from Lees Ferry on any single day. The maximum number of commercial passengers per boat will be 20 and the maximum number of passengers per commercial trip will be 40. Commercial trips will not travel more than 40 miles per day.

hikers use the trails in the Cross-Canyon Corridor between Bright Angel Point on the North Rim, and Grand Canyon Village on the South Rim. The areas of the Inner Canyon which are proposed for wilderness inclusion contain only nonmaintained trails which require a greater degree of stamina and expertise on the part of hikers, than do the Cross-Canyon Corridor trails. The growing demand for an Inner Canyon hiking experience coupled with camping restrictions and limitations in the Cross-Canyon Corridor, is placing an ever-increasing load upon these historic trails.

Visits to the National Park Service areas in the Grand Canyon region doubled in the decade of the 1960's to 4.8 million, and will probably double again during the 1970's. Travel to Grand Canyon National Park has also doubled in the last decade and approached 2 3/4 million visitors in 1972. By the end of the decade, it may easily reach the 4 million mark. The park is a major stop on the itineraries of summer travelers in the Southwest and West. A large number of foreign visitors make Grand Canyon National Park one of the principal stops on their tours of the United States.

Most visitors to the Grand Canyon stay only a few hours - just long enough to view the canyon from several viewpoints along the South Rim road system. During peak periods of travel, most visitors arrive and leave during daylight hours. Within the park are substantial overnight accommodations on the rims, capable of handling 3,500 people, and developed campgrounds with a total of 500 campsites. Approximately 500 rooms are available at Moqui Lodge and at the village of Tusayan, just outside the south entrance to the park in the Kaibab National Forest. Motel additions in the village of Tusayan will add 250 rooms by 1974. Camping sites are available 10 miles south of the park at the United States Forest Service's 10-X Campground. Several camper parking sites and campgrounds are being developed along Arizona 64, south of the park toward the city of Williams.

Private motels and campgrounds at and near Flagstaff and Williams, Arizona, can accommodate a sizeable number of visitors, and further expansion of campgrounds outside the park can be expected in proportion to the demand. Cameron and Gray Mountain, 60 miles to the east of the park, have modest overnight accommodations. Although the tourist-oriented towns of Flagstaff and Williams are only 1 to 2 hours drive away from the park, hundreds of campers park along roads leading into the park during peak periods of visitation.

Archeologist has been contacted and has provided archeological clearance for the proposed action.

The option for nonwilderness administration, development and management of these lands will be foregone under the wilderness proposal. However, by the fact of the proposal, the National Park Service considers this loss of option to administrative action to be for the best use of the land and to have a minimal impact on present land use policy. Management costs will increase because of wilderness limitation and the need to more strictly limit the amount and type of visitor/use in wilderness areas.

Wilderness designation will have a positive impact on archeological resources by preventing possible destruction of archeological remains, as a result of construction activities, and by limiting types of visitor activities within the wilderness. A limited negative impact may result through increased costs of archeological and other scientific studies owing to the limitations on the use of mechanized access to a wilderness area. However, where no other means of transportation is feasible, it is within the prerogative of wilderness management to permit the use of helicopters for scientific or management support. With adequate justification, archeological excavations are permitted within wilderness, but without the use of mechanical or motorized equipment. Study sites will be restored to their prestudy condition except in special cases where it is feasible and desirable that the excavated site or feature be viewed by wilderness users.

At the present time, 16 commercial firms provide scenic flights over the Grand Canyon Complex. Both fixed-wing aircraft and helicopters are used. The Tri-State Flight Operators Association, which represents these firms, reported in 1971 that approximately 100,000 persons per year utilize the scenic flight services. The flights operate at varying altitudes both above and below the canyon rims, but no landings are permitted within the park except for emergency or approved management purposes. The proposed wilderness designation will not preclude the continued operation of these scenic flights. Negotiations with the flight operators during the past year have resulted in improved cooperation between the operators and the National Park Service. Scenic flights have been rerouted to lessen the visual and audible impact of these flights over heavy visitor/use areas of the South Rim and the Cross-Canyon Corridor. Continuing efforts will be made to reduce the effects of these flights upon the areas recommended for wilderness designation.

A revised Master Plan and boundary proposal for Grand Canyon are now pending approval. This Master Plan recommends that legislation enacting the boundary proposal also repeal the reclamation provision in the act of February 26, 1919, which established Grand Canyon National Park. This provision allows the Secretary of the Interior to permit utilization of areas within the park for the development and maintenance of a government reclamation project. However, Section 605 of Public Law 90-537, approved September 30, 1968, provides that Part I of the Federal Power Act shall not apply to the portions of the Colorado River between Hoover Dam and

The primary environmental impact of the proposed action will be to give the scenic, social, and environmental values found in these parcels of land, the protection from the hand of man afforded by the Wilderness Act. The present status of these lands as natural areas of the National Park System indicates that they contain values of national significance. Because of its spectacular uniqueness, the Grand Canyon of the Colorado River is often listed as one of the seven natural wonders of the world. The "re-creational" values of Grand Canyon do not depend upon its awesome size or photogenic quality; nor in its being listed in the "top seven" of natural wonders.

Efforts will continue to be made to reduce the effects of scenic air flights on the wilderness areas of the park. River running concessioners will be encouraged to phase out the use of motors as soon as is economically feasible before the 1977 deadline. This reduction in motor use will enhance the wilderness experience for both river runners and wilderness hikers near the river.

Endemic infestations of forest insects or diseases and wildfires that threaten an unacceptable loss of wilderness values, loss of life, damage of property, or which threaten to spread to adjacent public or private lands, will be controlled under the provisions of the Wilderness Act of 1964, subject only to any Secretarial limitations imposed.

6. THE RELATIONSHIP BETWEEN LOCAL, SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

"...It is hereby declared to be the policy of Congress to secure for the American people of present and future generations, the benefits of an enduring resource of wilderness."--P.L. 88-577, September 10, 1964. Wilderness designation, by definition, is an action that is long-range in nature and precludes short-term comsumptive use of the resources represented therein.

While current and future use is primarily for social and educational purposes of the general public, its commitment to wilderness can be reversed at some future time by federal legislative action, should the consumptive use of the resources be deemed necessary for the well-being of the Nation.

Short-term, consumptive uses such as revenue-producing hydroelectric sites would eliminate the possibility of wilderness designation for these lands. Other forms of electrical power generation such as geothermal, solar, and nuclear, are being developed to meet the Nation's increasing need for low-pollution power sources. A hydroelectric power plant and reservoir can be developed at any time from a wilderness area, but a wilderness area such as that found within Grand Canyon would be nearly impossible to recreate from the site of an old reservoir.

Maintenance of the wilderness as a preserve managed according to existing antiquities legislation and National Park Service policy and activity standards for historical and archeological resources will continue to insure optimum, long-range preservation of archeological and historical resources.

The preservation of the unique combination of scenic, biotic, geologic, and historic values in the areas proposed for wilderness in the Grand Canyon Complex is a long-term gain for the environment and for future generations of Americans.

8. ALTERNATIVES TO THE PROPOSED ACTION:

The basic alternatives to the proposed action are more, or less wilderness designation and no wilderness designation. It is self-evident that the permutations of proposals for more or less land being placed in wilderness are practically limitless. Only significantly different alternatives will be considered in this impact statement. No significant beneficial or adverse impacts on the environment were found when considering addition or deletion of lands which meet wilderness criteria. Lands were added or deleted from the wilderness proposal because of nonqualification, social impact, or management needs.

A. No Wilderness Designation

Public Law 88-577 (The Wilderness Act) requires that a suitable study be made to determine the potential of National Park Service lands for inclusion in the Wilderness System. Failure to follow the required actions would violate the intent of Congress.

The required study indicated that there are lands within the Grand Canyon Complex which are suitable for designation as wilderness. These lands have therefore been recommended for such designation.

If no action is taken and these lands within the Grand Canyon Complex are not firmly protected by wilderness designation, it is possible that entire ecosystems may be altered or completely destroyed by nonwilderness use, developments, and land management practices. If no action is taken, the area will continue to be managed for primitive back-country use in the near future. However, pressures for roads, visitor facilities, dams, and other developments could cause a change in management of the area and destroy its present wilderness values.

B. Less Wilderness Designation

The original wilderness proposal for the Grand Canyon Complex was reduced by 3,900 acres due to an indefinite boundary between Marble Canyon National Monument and Navajo Nation lands. Once this boundary is clarified, it may be possible to recommend some of this land for wilderness status. No environmental impacts of sufficient degree were found which would justify a further reduction in the size of the present wilderness recommendation.

A second alternative of less wilderness designation which was considered, was to create 1/8-mile wide management zones to act as a buffer between the proposed wilderness and nonpark lands. Exclusion of these zones would reduce the total areas recommended for wilderness designation by 7,470 acres. Under current National

ACREAGES

GROSS ACREAGE	897,935
GRAND CANYON NATIONAL PARK	673,575
GRAND CANYON NATIONAL MONUMENT	198,280
MARBLE CANYON NATIONAL MONUMENT	26,080

AREA	ROADLESS	UNIT	WILDERNESS
A	789,000	1	132,700
		2	3,900
		3	59,500
		4	155,000
		5	134,700
		6	14,500
		7	5,000
B	8,100		NONE
C	6,500		NONE
D	5,400		NONE
E	10,000		NONE
F	5,500		NONE
TOTALS	824,500		505,300

LEGEND

- EXISTING PARK BOUNDARY
- WILDERNESS AREA LINE
- ROADLESS AREA LINE
- MAJOR ROADS
- MINOR ROADS
- TRAILS
- PRIVATE LAND (P)

North

0 5 10 15 20
scale in miles

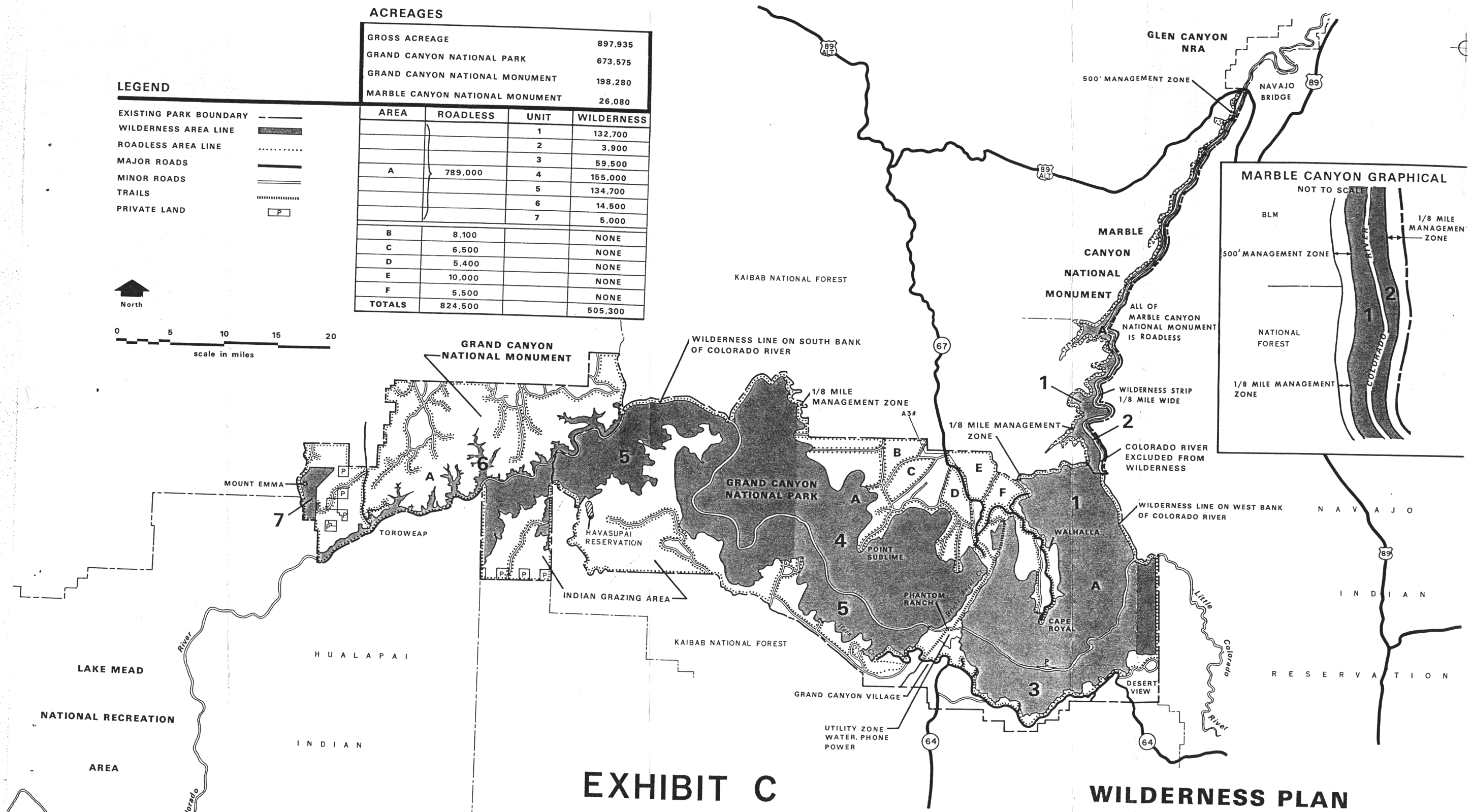

EXHIBIT C

WILDERNESS PLAN
GRAND CANYON COMPLEX

GRAND CANYON NATIONAL PARK
GRAND CANYON NATIONAL MONUMENT
MARBLE CANYON NATIONAL MONUMENT

PRELIMINARY-SUBJECT TO CHANGE

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REFERENCE LIBRARY
GRAND CANYON
NATIONAL PARK

ACREAGES

GROSS ACREAGE	897,935
GRAND CANYON NATIONAL PARK	673,575
GRAND CANYON NATIONAL MONUMENT	198,280
MARBLE CANYON NATIONAL MONUMENT	26,080

AREA	ROADLESS	UNIT	WILDERNESS
A	789,000	1	132,700
		2	3,900
		3	59,500
		4	155,000
		5	134,700
		6	14,500
		7	5,000
B	8,100		NONE
C	6,500		NONE
D	5,400		NONE
E	10,000		NONE
F	5,500		NONE
TOTALS	824,500		505,300

LEGEND

- EXISTING PARK BOUNDARY
- WILDERNESS AREA LINE
- ROADLESS AREA LINE
- MAJOR ROADS
- MINOR ROADS
- TRAILS
- PRIVATE LAND (P)
- ALTERNATIVE PROPOSAL (X)

North

0 5 10 15 20
scale in miles

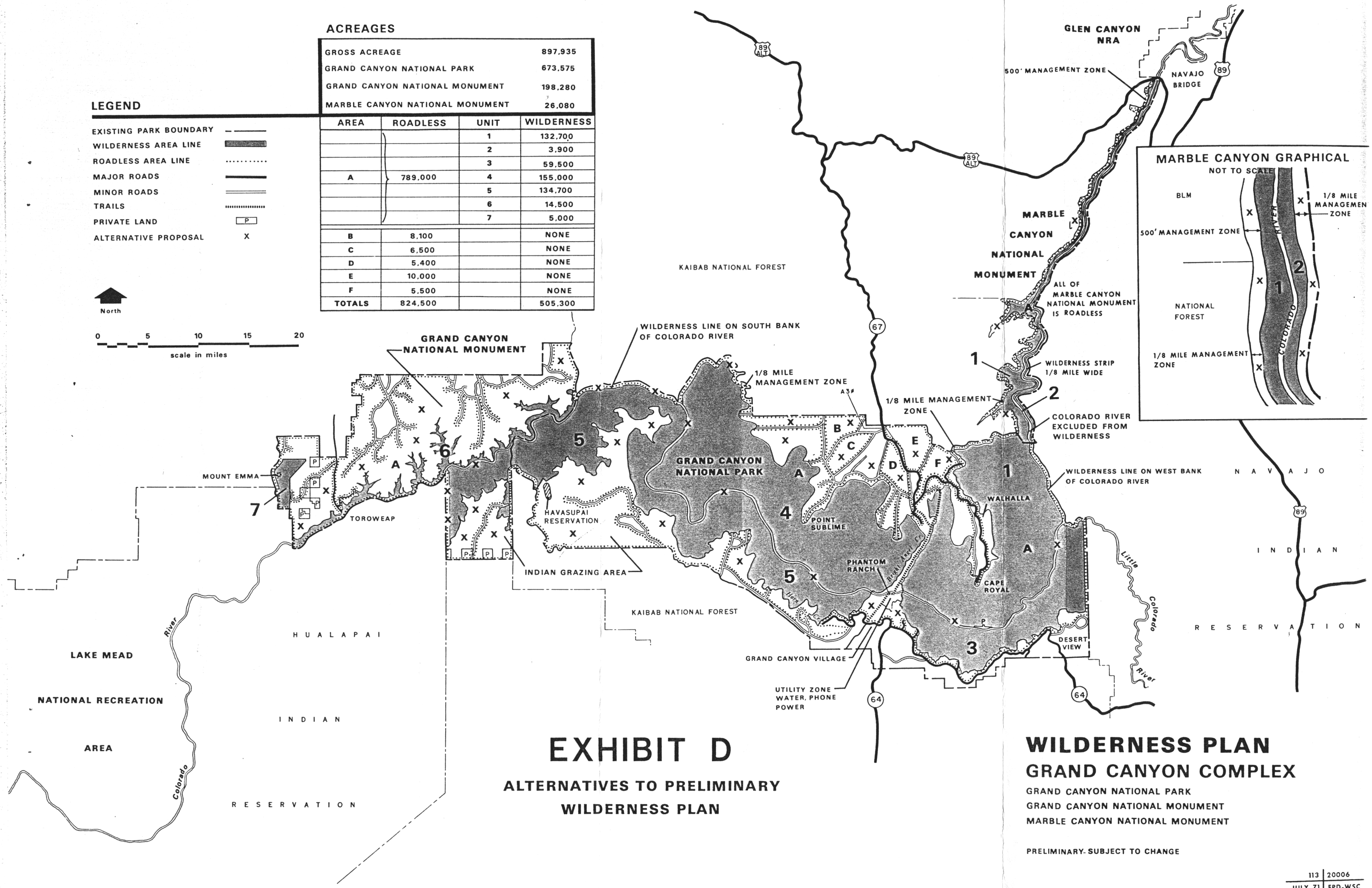

EXHIBIT D

ALTERNATIVES TO PRELIMINARY WILDERNESS PLAN

WILDERNESS PLAN

GRAND CANYON COMPLEX

GRAND CANYON NATIONAL PARK
GRAND CANYON NATIONAL MONUMENT
MARBLE CANYON NATIONAL MONUMENT

PRELIMINARY- SUBJECT TO CHANGE

113	20006
JULY 71	EPD-WSC

5. Several areas on the North Rim were considered for recommendation as wilderness. These areas constitute virtually all of the North Rim outside of the developed areas at Bright Angel Point and Cape Royal. These areas are separated by a network of roads which is indicated on the exhibit maps included in this statement. Several of these areas are included in the potential wilderness addition category. These lands were not recommended for inclusion in the present wilderness proposal because of an ongoing resource management program designated to reduce the excessive fire fuel buildup, resulting from 70 years of fire protection, and to return the area to a natural process of ecological succession. Much of the equipment necessary for this controlled burning is motorized and prohibited in wilderness areas.

D. Additional Potential Wilderness Designation

A recent management decision by the National Park Service to eliminate the use of motors on the Colorado River through the Grand Canyon Complex and a new River Use Management Plan, have made the 5,000 to 6,000 acres of the river eligible for classification as potential wilderness. When motorized craft are completely phased-out in 1977, the river will become eligible for classification as wilderness. The National Park Service and the majority of responding agencies and individuals to the Draft Environmental Impact Statement endorse this alternative for addition to final wilderness legislation.

9. CONSULTATION AND COORDINATION WITH OTHERS:

1. Consultation and Coordination in the Development of the Proposal and in the Preparation of the Draft Environmental Statement

Public hearings on the preliminary wilderness proposal were held in Phoenix, Arizona on May 15, 1971, and in Grand Canyon National Park on May 18, 1971. In addition, public comment was requested by legal notice in the local newspapers of Williams, Arizona, Flagstaff, Arizona, and Kanab, Utah. The preliminary packet was mailed to organizations and individuals to solicit their comments and/or attendance at the public meetings. The proposal was also available for public inspection at the following locations: Grand Canyon National Park, National Park Service Southwest Regional Office, and in the National Park Service Offices in Washington, D. C. The proposal has been coordinated with the Bureau of Indian Affairs through correspondence and meetings of the Park Superintendent and the BIA. The Bureau of Reclamation was contacted, but their correspondence indicated that the wilderness proposal would have minimal impact upon Reclamation programs and activities. In addition, the authority to construct dams within the Grand Canyon Complex can only be invoked by Congressional action. As a result, further coordination with the Bureau of Reclamation was not considered to be necessary.

Of the 1,097 public responses to the preliminary wilderness study, 23 favored a no-wilderness designation. This group of no-wilderness supporters is comprised of: certain Indians who would prefer more intensive land use adjacent to them; people concerned about water resource potentials and the foreclosure of dam projects; and business-oriented interests who see curtailment of commercial ventures on lands outside the park because wilderness designation will not cause an extensive influx of people.

The Sierra Club, the Wilderness Society, and a number of national and local conservation organizations presented similar proposals that recommended an enlarged National Park Service proposal. These groups recommended that an additional 11 areas, totaling 345,205 acres, be added to proposed wilderness units. These additions would result in a two-unit Grand Canyon wilderness, consisting of an eastern unit of 241,285 acres and a western unit of 609,220 acres. The nonwilderness utility corridor along the Bright Angel and North Kaibab Trails dividing the two units, would be narrowed, resulting in an addition of 11,310 acres. Inclusion of Havasu Canyon and its tributaries above Mooney Falls, except Havasupai Campground, would add 68,200 acres to wilderness.

The largest proposed addition would involve 113,880 acres in Grand Canyon National Monument, and include portions of the pinyon/juniper

forest on the Kanab Plateau and the Esplanade below the canyon rim. This area was excluded from the National Park Service proposal because of the existence of livestock grazing. The conservation groups' position is that established grazing is permissible under the provisions of the Wilderness Act, and should not be the basis for exclusion of lands from wilderness. An additional 20,690 acres in the Toroweap Valley area is also recommended.

Their proposal also suggests that the Colorado River should be included in wilderness, despite the continued use of motorized rafts, because they feel that the use of motors is permissible under the terms of the Wilderness Act. A number of groups also recommended that motor-powered trips down the river be discontinued.

The National Parks and Conservation Association presented a similar proposal, and recommended that wilderness be extended to one side of all existing public roads within the park, with a 1/8-mile buffer zone flanking the other side of the road.

The State of Arizona concurred in proposed Wilderness Units 1-6, but recommended that Unit 7 in the Mount Emma area be transferred to Lake Mead National Recreation Area, so as to allow hunting in that area.

The Navajo Nation was opposed to the proposed Wilderness Unit 2. They raised the question of their use and occupancy rights on the east side of Marble Canyon under the 1934 Boundary Act, which retained for the Navajo Nation the right of use and occupancy on withdrawn land until the land "shall be required for power purposes or other uses under the authority of the United States." It is their contention that the right of use and occupancy granted by the 1934 statute continues in full force and effect.

The Havasupai Tribe supported the National Park Service proposal because it did not include the grasslands in the Great Thumb area and on the Tenderfoot Plateau that they now use for livestock grazing.

Aircraft operators in the tri-state area of Nevada, Utah, and Arizona spoke at the wilderness hearings, although their comments did not directly support or oppose the National Park Service proposal. They believe that many of the visitors who fly the Grand Canyon will never set foot within the park. They think their flights provide an immense service and a great scenic and wilderness experience to these persons, and recommend that aircraft continue to be allowed to fly below the rims of Grand Canyon.

SUMMARY OF RESPONSES RECEIVED TO THE PRELIMINARY WILDERNESS PROPOSAL

Recommendation	Public Agencies	Private Organizations	Individuals	Totals
Support NPS Proposal	0	4	9	13
Favor more wilderness	1	49	691	741
Favor less wilderness	3	4	6	13
Wilderness, no specific recommendation	1	3	60	64
Opposed to wilderness	0	1	22	23
Acknowledged receipt of material or no specific comment on wilderness proposal	10	5	228	243
TOTALS	15	66	1,016	1,097

Requests for written responses and public testimony at the public hearings resulted in participation from the following organizations:

State of Arizona, Governor
State of Nevada, Colorado River Commission
State of Utah, Office of the Governor
U.S. Department of Agriculture, Deputy Chief, Forest Service
U.S. Department of the Army, Corps of Engineers, Los Angeles District
U.S. Department of Commerce, Administrator, National Oceanic and Atmospheric Administration
U.S. Department of the Interior
Geological Survey
Bureau of Indian Affairs
Bureau of Mines
Bureau of Outdoor Recreation
Bureau of Sport Fisheries and Wildlife
U.S. Department of Transportation
Federal Power Commission
Aircraft Owners and Pilots Association
American Camping Association, Central Arizona District
Appalachian Mountain Club, Boston, Massachusetts
Arizona Academy of Science
Arizona Conservation Council
Arizona Mountaineering Club
Arizona Wildlife Federation
Arizonans for Quality Environment (AWWW)
Arizonans in Defense of the Environment
Bluff City Cave Club, Memphis, Tennessee
Pennsylvania Environmental Action/Zero Population Growth, Pittsburgh, Pennsylvania
Pueblo Audubon Society, Pueblo, Colorado
Save the Grand Canyon Committee, Albuquerque, New Mexico
Seattle Audubon Society, Seattle, Washington
Sierra Club (Southwest Region)
Sierra Club, Huron Valley Group, Ann Arbor, Michigan
Sierra Club, New England Chapter
Sierra Club, Plateau Group
Sierra Club, Prairie Chapter, Illinois
Sierra Club, Rio Grande Chapter, New Mexico
Sierra Club, Tulsa, Oklahoma Group
Southern Arizona Hiking Club
Student Coalition Against Pollution, Tulsa, Oklahoma
Student Council on Pollution and the Environment, Pacific Southwest Region
Swan Citizens Conservation Council, Condon, Montana
Tri-State Operators Association
Tucson Audubon Society
Tucson Wildlife Unlimited, Incorporated
Wasatch Mountain Club, Salt Lake City, Utah
Wilderness Society
Wilderness Workshop of Colorado

2. Coordination in the Review of the Draft Environmental Statement:

On September 19, 1972, the draft was made available for review by other federal agencies and interested organizations and individuals.

a. The Draft Environmental Impact Statement was mailed to each of the organizations and individuals listed below for their review and comment:

Department of Agriculture
  Forest Service
  Soil Conservation Service
Department of the Interior
  U.S. Geological Survey
  Bureau of Indian Affairs
  Bureau of Mines
  Bureau of Outdoor Recreation
  Bureau of Sport Fisheries and Wildlife
  Bureau of Land Management
  Bureau of Reclamation
Federal Power Commission
Arizona State Clearinghouse
  State Liaison Officer for Historic Preservation

b. Information copies of the Draft Environmental Impact Statement have been mailed to the following:

State of Arizona, Office of the Governor
Mayor, City of Kanab, Utah
Mayor, City of Flagstaff, Arizona
Mayor, City of Williams, Arizona
Department of the Army, Corps of Engineers
Department of Commerce
Department of Housing and Urban Development
State of Arizona
  Game and Fish Department
  Parks and Recreation Department
  Water Commission
  Land Commission
  Aeronautics Board
  Department of Planning and Development
  State Clearinghouse
Aircraft Owners and Pilots Association
Arizona Academy of Science
Arizona Wildlife Federation
Arizonans for Quality Environment (AWWW)
Coconino County Planning Commission
Colorado Open Space Council; West Slope Environmental
  Coordinating Center of Colorado

Colorado River Outfitters Association
Desert Protective Council
Environmental Conscience Incorporated
Grand Canyon Workshop of Colorado Open Space Council
Havasupai Tribe
Hualapai Tribal Council
National Wildlife Federation, Washington, D.C.

The following is a list of those who made comments on the draft statement. A copy of each comment is included in the Appendix of this statement.

Department of Agriculture
  Soil Conservation Service

Department of the Interior
  Bureau of Indian Affairs
  Bureau of Land Management
  Bureau of Mines
  Bureau of Outdoor Recreation
  Bureau of Reclamation
  Bureau of sport Fisheries and Wildlife
  Geological Survey

Federal Power Commission
Arizona State Clearinghouse
Arizona Highway Department
Arizona Power Authority
Arizona Land Department
Arizona Water Commission
Advisory Council on Historic Preservation
Sierra Club - Southwest Office
Sierra Club - Plateau Group
Colorado Plateau Environmental Advisory Council
School of Forestry, Northern Arizona University
Museum of Northern Arizona
The Arizona Republic
The Desert Protective Council, Inc.
Tucson Audubon Society
Northern Arizona Audubon Society
Wilderness World
Arizona River Runners, Inc.
Wonderland Expeditions

Individual Responses:
  Howard B. Stricklin
  J. H. Butchart

Stephen C. Jett
Edwin J. & Bernice L. Purcell
Judy Dyke
Ray Varley
Fred B. Eiseman, Jr.
Lemoyne Dwight Baquet

Specific comments and responses are as follows:

1. Soil Conservation Service, USDA

Comment: No criticism of Draft Environmental Impact Statement.

2. Bureau of Indian Affairs, USDI

Comment: The Bureau of Indian Affairs believes the statement adequately reflects the environmental ramifications of this proposal and supports the establishment of the Wilderness Classification for the portion of the Grand Canyon National Park identified in the environmental statement. No conflict with Indian trust lands was identified, and field level personnel indicate that the area included in the proposal has been established as a result of informal communications between the Bureau of Indian Affairs, the associated tribal organizations, and the representatives of the National Park Service.

3. Bureau of Land Management, USDI

Comment: Statement does not discuss the amount of interagency coordination necessary between the Bureau of Land Management and the National Park Service in relation to jurisdiction of adjacent lands.

Response: Contact and coordination of land management activities is attempted by the National Park Service with other land management agencies when proposed actions within the park will reach beyond its boundaries. The Bureau of Land Management has been consulted in the Wilderness Proposal and forthcoming boundary realignment legislation.

Comment: The possibility for an overall multi-land use program for the Mount Emma area has not been explored.

Response: The Mount Emma area is a scenic and scientifically important portion of Grand Canyon National Monument. It contains the only stand of ponderosa pine in the monument and contains the only Canadian Life Zone within the Grand Canyon Complex. The area contains the Mount Emma Natural Area, a pure virgin stand of ponderosa pine with all ages of trees represented. This natural area is one of seven areas within the Grand Canyon Complex, selected by the Society of American Foresters and designated by the Federal Committee on Research Natural Areas for preservation as prime examples of pristine vegetation types. National Park Service policy is for protection, scientific study and enjoyment of these nationally significant resources rather than multiple use, and multiple uses such as grazing, mining, and timber production are incompatible with the wilderness designation and resource protection sought for the Mount Emma area.

Comment: The current split jurisdiction of the entire area with differing management concepts should be discussed prior to the designation of any given area into a natural program.

Response: In January 1970, the Arizona State Director of the Bureau of Land Management expressed concern that the Mount Emma area should be deleted from Grand Canyon National Monument and transferred to the Bureau for multiple-use management. Discussion of this and other land areas of mutual concern has continued with both the Bureau of Land Management and the U.S. Forest Service. The National Park Service believes that the creation of wilderness areas within the Grand Canyon Complex will not significantly affect the land-use policies of other land management agencies. The other agencies may wish to consider established wilderness areas within the Grand Canyon Complex when identifying suitable wilderness areas on their contiguous lands.

4. Bureau of Mines, USDI

Comment: Mineral potential of the area proposed for wilderness is not known, but minerals do occur there. The environmental statement would be more complete if it pointed out the possibility of mineral occurrences, such as those of uranium, copper, lead and asbestos.

Response: Mineral resources are now discussed under "Description of the Environment," page 11.

Comment: In the page 1 reference to a patented mining claim in the proposed wilderness, we assume that its 325 acres actually consist of a group of claims under single ownership inasmuch as the standard lode claim consists of 20.67 acres.

Response: This is correct, and the reference has been changed to indicate a group of claims.

Comment: To the reference that the claims have not been worked for more than 20 years should be added the thought that the history of many mines is one where they are reopened several times to produce again under changing economic and technical developments.

Response: The establishment of mining claims on park lands within the Grand Canyon Complex is prohibited by law. Wilderness designation would not relieve this prohibition. Patended mining claims are privately owned, and should the economic picture change or new ore bodies be found within these claims, they might well resume production. The construction of haulage roads, tramways, and the like would be prohibited across park lands including those lands designated as wilderness.

5. Bureau of Outdoor Recreation, USDI

Comment: The statement excuses the exclusion of undeveloped rimlands west of Grand Canyon Village on the South Rim because of existing grazing of stock owned by the Havasupai Indians: We do not believe that grazing is incompatible with the Wilderness Act.

Response: The Havasupai Indians are faced with the problem of a growing population and a limited and isolated land resource. The Indians utilize portions of the park and monument areas for grazing cattle and horses. On the northern portions of the Great Thumb and Tenderfoot Plateau areas, this domestic grazing conflicts with prime desert bighorn sheep habitat, which is essential to the existence of the bighorn in the park.

To assist the Havasupai in implementing their desire for a greater land base and an opportunity to better control their own social and economic life, others have proposed that about 15,000 acres of land on the Tenderfoot Plateau in Grand Canyon National Monument, and about 41,000 acres in the Manakacha-Topocoba area of Grand Canyon National Park be transferred from National Park Service jurisdiction and incorporated in an enlarged Havasupai Reservation. The National Park Service has stated that additional study is required before the Department can make a recommendation on this proposal. The Department has stated that it intends to make such a study in

cooperation with the Department of Agriculture. The Department has requested that, in the meantime, these lands be retained under National Park Service administration. The scheduled study could, of course, conclude, and make a recommendation that, these lands or a portion of them, subsequently be transferred to the Havasupai Tribe. Until such study and recommendations are completed, the existing grazing privileges of the Havasupai Tribe within Grand Canyon National Monument and Grand Canyon National Park will continue. Because of these grazing privileges and the pending study of the disposal to be made of these lands, they were not recommended for wilderness designation.

6. Bureau of Reclamation, USDI

Comment: Weather modification activities of this bureau are not prohibited, per se, on lands under wilderness classification. Will weather modification activities be permitted on lands affected by this proposal?

Response: Units of the National Park System are subject to preservation of natural conditions as mandated in the Act of August 25, 1916. As reflected in the Wilderness Act of 1964, wilderness designation requires no change in this mandate. The National Park Service must continue to manage lands under its jurisdiction in accordance with established law.

We agree that research concerning this issue must be carried out. However, the question insofar as applications to units of the National Park System is broader than lands recommended for wilderness and must concern likely effects upon natural values represented by parklands.

Comment: We believe that any wilderness designation should permit the establishment of and reasonable access to sites for gathering vital hydrologic and climatological data and for conducting precipitation management research activities in connection with the Reclamation program.

Response: It is not intended that research be curtailed under wilderness designation. Collection of data on water resources and studies involving no permanent installations or mechanical equipment will be allowed. There are, at present, no snow courses within the proposed wilderness. If, at some future time the need arose for precipitation management research activities requiring motorized access, they could be conducted on lands excluded from wilderness.

Comment: Map revisions are necessary to show that the Colorado River, adjacent to the Hualapai Indian Reservation, is not a part of the proposed Wilderness Unit 6.

Response: Unfortunately, map revisions were not possible. However, it is correct that the Colorado River is not included in Wilderness Unit 6.

Comment: The statement does not adequately present the position and interests of the local Indian tribes in sufficient detail to fully evaluate the impact the proposed wilderness areas may have on them.

Response: The final statement incorporates a discussion of Indian needs on pages 4 and 24.

7. Bureau of Sport Fisheries and Wildlife, USDI

Comment: No critical comment on the Draft Environmental Impact Statement.

8. U.S. Geological Survey, USDI

Comment: Discuss impact of proposed action on mineral resources of the area.

Response: Mineral resources are now discussed under "Description of the Environment," page 11. The change of park lands to wilderness status will not change their legal accessibility. Wilderness classification will have no effect on mineral resources outside of the park.

Comment: What will be the effect of wilderness designation upon the Geological Survey's gaging station at Phantom Ranch? The Geological Survey would like some provision in the proposal that will guarantee access to the present, and any possible future gaging site.

Response: The present gaging station is within the Cross-Canyon Corridor which is not proposed for wilderness status. Permanent gaging structures such as cables across the Colorado River would be considered nonconforming use in a wilderness. Boat, horse, foot and helicopter access to present and future gaging sites will not be affected by wilderness designation. Mechanical vehicular access to "any possible future gaging site" cannot be guaranteed and would not be permitted over areas designated as wilderness.

9. Federal Power Commission

Comment: No criticism of Draft Environmental Impact Statement.

10. Arizona State Clearinghouse

Comment: No critical comment on the Draft Environmental Impact Statement. State agency comments are listed separately below.

11. Arizona Highway Department

Comment: The proposed park wilderness would have no effect on any existing or presently contemplated projects of the Arizona Highway Department.

Comment: The Arizona State Parks Board was not solicited for review and comment of this impact statement, and the Environmental Protection Agency is omitted from the list of those who have been asked to review and comment on this statement.

Response: The Arizona State Parks Board was solicited, as were all State of Arizona agencies, through the Arizona State Clearinghouse. The Environmental Protection Agency will have an opportunity to comment on the impact statement through its normal legal jurisdiction.

12. Arizona Power Authority

Comment: The Authority strongly objects to the proposal made by the National Park Service to designate, as wilderness, the Marble Canyon National Monument, because this includes the Marble Canyon Dam site and the major portion of its reservoir area. In order for Arizona to obtain a license to construct a dam at the Marble Canyon site, it must first receive approval of the United States Congress, and then meet the stringent license requirements of the Federal Power Commission, as well as comply with the National Environmental Policy Act of 1969. The environmental values of the affected reaches of the Colorado River at the Marble Canyon site and reservoir would certainly appear to be adequately protected under these circumstances. We, therefore, submit that no useful purpose would be accomplished by designating the area encompassing the Marble Canyon site and reservoir as wilderness. Instead, an unnecessary sacrifice by the State of Arizona would probably result in the foreclosure forever of the potential development of the Marble Canyon site.

Response: This impact statement addresses itself only to the impact of wilderness designation upon potential water impoundment sites, and it is not the proper vehicle in which to discuss the highly controversial validity of constructing dams within a national park or national monument. As mentioned in the comment by the Arizona Power Authority, the permanent, long-term, adverse environmental impacts of these dams and their benefits to human environment would be properly weighed in the appropriate impact statements which would be required, should the United States Congress remove the current prohibitions on their construction. As the physical resource remains untouched by the wilderness proposal, its potential use as a reservoir site remains unaffected - only its current legal status is affected.

13. Arizona State Land Department

Comment: The State Land Department has no comment on this project.

14. Arizona Water Commission

Comment: The conflict between wilderness designation and dam construction within the Grand Canyon Complex is not adequately covered. Marble Canyon and Hualapai dams and reservoirs should be located on the maps in the report, and existing requirements for the development of these resources should be compared with the requirements which would exist should the proposal be implemented. Also, some type of quantification such as a comparison of the acreage required for hydro-electric developments with the total acreage of the proposed wilderness should be provided.

Response: As mentioned in Response No. 12, the National Park Service feels that the proper vehicle in which to discuss the environmental impact of dams on Grand Canyon National Park and Grand Canyon National Monument, is the Environmental Impact Statement for the proposed dams, should they ever be permitted by Congress. The Marble Canyon and Hualapai dams and reservoirs are only two of the many water impoundments which have been proposed along the Colorado River and its tributaries within the Grand Canyon Complex. To validly discuss the impact of these many and varied water projects upon the environment of the Grand Canyon Complex is impossible without explicit descriptions of the proposals. Various agencies, organizations, and individuals press for their particular projects with varying amounts of enthusiasm and dedication. If this wilderness impact statement attempted to address itself to the multiplicity of proposals

and their almost limitless ramifications, it would have to remain open-ended for all possible variations of the water impoundment theme. To select only the two dam and reservoir sites mentioned by the Arizona Water Commission would be to beg the question of impact on a wilderness area, and would be futile until exact proposals can be made for these dams and Congressional approval obtained for their construction.

Comment: Nonutilization of the hydro-electric potential of the Colorado River, as it flows through the canyon area, constitutes an irreversible action. The energy lost every hour could be substituted for nonrenewable resources such as coal, oil, and natural gas.

Response: Nonutilization of the hydro-electric potential of the Colorado River, as it flows through the Grand Canyon Complex, is irreversible only in the sense that the power that could be generated from it is not utilized at this point in time and this specific geographic location. As long as the hydrologic cycle continues and as long as the Colorado River continues to flow into the canyon, the potential for hydroelectric generation exists. This potential for power generation could be greatly increased by the elimination of upstream dams and impoundments, which presently curtail the normal flow of the Colorado River and are changing the natural environment of the Inner Canyon.

15. Advisory Council on Historic Preservation

Comment: No critical comment on the Draft Environmental Impact Statement.

16. Sierra Club - Southwest Office

Comment: Motorized transport on the river should cease, and the river be designated as wilderness.

Response: Motorized transportation on the Colorado River within the Grand Canyon Complex is to be phased-out by 1977. The area is listed in alternative "D" and endorsed for potential wilderness classification, so that it can receive wilderness designation in the future. Visitor/use limits for the river are being reduced as explained in "Description of the Environment."

Comment: Motorized air transport should be confined to 10,000 feet above sea level for any craft above the canyon.

Response: Efforts are continuing to reduce the effects of scenic flights on the wilderness through regulation and voluntary cooperation. Efforts are also being made to have the

Federal Aviation Administration issue flight restrictions over the Grand Canyon Complex. The National Park Service has no direct regulatory control of the air space over Grand Canyon.

Comment: Lands with genuine wilderness values should not be left out of wilderness designation because of prior rights or privileges, such as grazing or livestock driveways, especially in the areas of the Havasupai Indian Reservation.

Response: The Havasupai Indians are faced with the problem of a growing population and a limited and isolated land resource. The Indians utilize portions of the park and monument areas for grazing cattle and horses. On the northern portions of the Great Thumb and Tenderfoot Plateau areas, this domestic grazing conflicts with prime desert bighorn sheep habitat, which is essential to the existence of the bighorn in the park.

To assist the Havasupai in implementing their desire for a greater land base and an opportunity to better control their own social and economic life, others have proposed that about 15,000 acres of land on the Tenderfoot Plateau in Grand Canyon National Monument, and about 41,000 acres in the Manakacha-Topocoba area of Grand Canyon National Park be transferred from National Park Service jurisdiction and incorporated in an enlarged Havasupai Reservation. The National Park Service has stated that additional study is required before the Department can make a recommendation on this proposal. The Department has stated that it intends to make such a study in cooperation with the Department of Agriculture. The Department has requested that, in the meantime, these lands be retained under National Park Service administration. The scheduled study could, of course, conclude, and make a recommendation that, these lands or a portion of them, subsequently be transferred to the Havasupai Tribe. Until such study and recommendations are completed, the existing grazing privileges of the Havasupai Tribe within Grand Canyon National Monument and Grand Canyon National Park will continue. Because of these grazing privileges and the pending study of the disposal to be made of these lands, they were not recommended for wilderness designation.

A large section of the grazed land in the national monument, as shown in Exhibits A and B, is being proposed as potential wilderness so that it may receive wilderness designation when the lifetime grazing permits run out.

Comment: All areas on the North Rim, excluded from wilderness recommendation because of the controlled burning program, should be considered for potential wilderness designation.

Response: See alternative "C" - page 25.

Comment: The Cross-Canyon Corridor should be narrowed by placing the proposed wilderness boundary no more than 50 feet from any development or developed area.

Response: A reduction of the Cross-Canyon Corridor, as described above, would result in an addition of only 800 acres to wilderness status. Such a reduction of the corridor would leave little room for the maneuvering of mechanized equipment for repairing the Transcanyon Waterline. Borrow pits for trail tread material need to be located out of sight from trails and developed areas, and 50 feet is usually not far enough.

Comment: There should be coordination in the proposals from the Grand Canyon Complex and Lake Mead National Recreation Area.

Response: It would be extremely difficult to coordinate the wilderness proposals between the two areas in time, as well as in terms of use. The wilderness units of the two areas will be under two different administrative headquarters: Lake Mead National Recreation Area and Grand Canyon National Park. The policies of the National Park Service are different for wilderness land use practices in a national recreation area and a national park. Hunting, for instance, is considered a valid use of wilderness lands in a national recreation area, but not in a national park. Furthermore, grazing, mineral leasing, and use of land for power and reclamation purposes will be allowed in the Lake Mead National Recreation Area Wilderness. However, wilderness protection in one area will not be negated by developed areas in the other. The environmental statement for the proposed wilderness in Lake Mead National Recreation Area will discuss the problems inherent in applying the wilderness concept to a multiple-use area.

Comment: All wilderness within the Grand Canyon from the Grand Canyon Complex through Lake Mead National Recreation Area should be unified under the single name of the Grand Canyon Wilderness.

Response: To place the wilderness areas under a single name in both areas would confuse and blur the distinction between the two areas in the public's mind. Managing a single area under two conflicting land use policies is untenable. However, if legislation is passed by Congress to enlarge Grand Canyon National Park to include those lands in Lake

Mead National Recreation Area to the Grand Wash Cliffs region, the wilderness areas could be unified and use conflicts resolved.

Comment: The National Park Service should make every effort to work with the Navajo, Havasupai, and Hualapai Indian Tribes so that they might see the values, including economic, of leaving prime wilderness lands within their reservations in an undeveloped state.

Response: The National Park Service has, and will continue to, cooperate with the nearby Indian tribes in developing or not developing lands suitable for recreation, including wilderness activities. The importance of reservation wilderness lands bounding National Park Service wilderness lands will not be undervalued.

Comment: The interpretive staff at Grand Canyon National Park is limited and should be expanded to promote active appreciation of the Grand Canyon wilderness by all visitors to the park.

Response: Wilderness classification for lands within the Grand Canyon Complex will create no increase in either protection or interpretive personnel. Limitations in park staffing are beyond the subject scope of this Environmental Impact Statement.

17. Sierra Club - Plateau Group

Comment: No critical comment on the Draft Environmental Impact Statement.

18. Colorado Plateau Environmental Advisory Council

Comment: No critical comment on the Draft Environmental Impact Statement.

19. School of Forestry, Northern Arizona University

Comment: Have the rights of the Havasupai and Hualapai Indians been properly considered and properly observed in the wilderness recommendation? I cannot see where their concern, as expressed in the wilderness recommendation, has been considered in the environmental statement.

Response: Tribal grazing privileges and boundary rights have been considered throughout the planning for the wilderness proposal. The tribal concern expressed during testimony and by letter to the wilderness hearings was caused by conflicts between graphics in the Park Master Plan and the wilderness proposal. The Master Plan contained a map which was highly schematic and did not accurately delineate the proposed wilderness boundaries.

20. Museum of Northern Arizona

Comment: Comments are editorial only.

21. The Arizona Republic

Comment: Motors should be eliminated on the Colorado River through Grand Canyon and the river recommended for wilderness status.

Response: See response to Sierra Club on page 41.

Comment: The impact statement should devote more analysis to the impacts resulting from the corridor. If additional tourist facilities are provided at Cottonwood, additional impact will result.

Response: The National Park Service has no plans to expand tourist facilities within the cross-canyon corridor. Overnight use at campgrounds is limited to an established capacity. Campgrounds at Cottonwood will remain limited to 40 persons per night. Overnight visitor-use is controlled by means of the campground reservation system within the corridor and in the surrounding wilderness areas. A new system is in operation to record the number of visitors, including day users, hiking the Bright Angel Trail. After sufficient data has been collected and analyzed, additional measures to reduce use impacts may be required. Development concept plans to upgrade existing facilities at Phantom Ranch and Indian Gardens will be accompanied by environmental assessments which will delineate any impacts upon surrounding wilderness lands.

22. The Desert Protective Council, Inc.

Comment: Cut back and reduce the use of motorized boats on the Colorado River and place it in wilderness.

Response: See response to Sierra Club on page 41.

Comment: Overflights spoil the wilderness experience of land surface visitors to the canyon with their horrendous loud echos. We believe that flights below the rim levels are inexcuseable except for urgent management business.

Response: The National Park Service has no jurisdiction over the air space above Grand Canyon National Park. Considerable cooperation has been obtained from local scenic flight operators concerning altitudes and routes of flights. Continued cooperation will be sought, as well as regulations from the Federal Aviation Administration to restrict private and commercial aircrafts from flying with the canyon.

23. Tucson Audubon Society

Comment: We would like to see motors banned from the river and it included in the wilderness.

Response: See response to Sierra Club on page 41.

Comment: We believe that all exterior buffer zones should be included in the wilderness.

Response: The response to this comment is covered in alternative "B."

Comment: The east side of Marble Canyon should be kept in wilderness until it is proven that it is Indian land.

Response: No lands on the east side of Marble Canyon are included in the recommended wilderness. The Navajo Nation claims use and occupancy rights in this area. If it should be determined that no such rights exist, the area will be restudied for wilderness suitability.

Comment: In conservationist area C, the Point Sublime Road should be kept open but the rest of the area should be placed in wilderness potential.

Response: See alternative "C" - page 25.

Comment: In unit B, wilderness should surround the road out to Cape Royal.

Response: See alternative "C" - page 25 of this statement.

Comment: In Unit F, wilderness should surround the Cape Royal Road.

Response: See alternative "C" - page 25.

Comment: Close some roads on rim areas to make more land available for wilderness and include rim lands that are open to Havasupai Indians for grazing purposes.

Response: Lands on the North Rim proposed as potential wilderness, will have existing roads closed as controlled burning programs proceed. Certain lands now being grazed by animals belonging to the Havasupai Tribe are proposed for transfer to the tribe in the Park Master Plan and the Park Boundary Proposal. In return, the Havasupai Tribe will relinquish grazing privileges on other park lands which may then be proposed for wilderness legislation.

Comment: We do not think the draft environmental statement covers the problem of sanitation on the river very well and the problem needs to be discussed at length.

Response: The river management plan mentioned on page 11 of this statement contains strict regulations and controls concerning sanitation along and on the river. All commercial boat operations on the river utilize chemical toilets and carry all noncombustable material from the canyon.

Comment: No estimate of the potential for timber use, grazing, or possible mineral deposits are mentioned in the Draft Environmental Statement. The potential needs to be mentioned and that park status precludes development of these resources so that designation changes nothing in this regard.

Response: Mineral resources are now discussed under "Description of the Environment." Timber and grazing potential is not discussed as the wilderness proposal has no impact upon these resource uses. Timber harvesting is not permitted in natural areas of the National Park System such as the Grand Canyon Complex. Grazing of domestic livestock in natural areas is permitted only where it is sanctioned by law, is incidental to visitor use, or is desirable to preserve and interpret significant historical resources of the area. These policies would not be affected by wilderness designation.

24. Northern Arizona Audubon Society

Comment: Motorized boats on the river should be phased-out by 1977, so that the river itself could be included in the wilderness category.

Response: See response to Sierra Club on page 41.

25. Wilderness World

Comment: Remove motors from the Colorado River and place the river in wilderness.

Response: See response to Sierra Club on page 41.

26. Arizona River Runners, Incorporated

Comment: Exclude the Colorado River from the wilderness proposal to allow the continued use of motors on river trips.

Response: The continued high interest on the part of more and more people to seek the white water experience of the canyon rapids has led to heavy congestion on the river. Human pollution and congestion and the reduction of the river trip to a fast, thrill-type experience are inappropriate in a national park, and pose a threat to the maintenance of the primitive quality of the Inner Canyon. The National Park Service believes that the desired river experience is the slow float trip in small parties, without motors and their accompanying noise and pollutant emissions.

Motorized transportation on the Colorado River within the Grand Canyon Complex is to be phased out by 1977. The river is listed in alternative "D" and endorsed for potential wilderness classification so that it can receive wilderness classification in the future. Visitor/use limits are also being reduced as explained in "Description of the Environment."

27. Wonderland Expeditions

Comment: Certain areas of the Colorado River itself are not used for the use of conducting motor-driven trips. Rocks, shoals, island and other obstacles precludes the use of motors in these areas. And they are extensive. Then why have you not shown why they are not to be included in the wilderness proposal?

Response: Taken together these areas are extensive, however, they are trivially small when taken individually. They are ecologically and environmentally linked to the river and will retain or acquire the same designation as the rest of the Colorado River through the Grand Canyon Complex.

27. Wonderland Expeditions

Comment: Place the Colorado River in wilderness and allow motors to be used on the river as a nonconforming use.

Response: The use of motors in a wilderness area is a nonconforming use in National Park System wilderness and thus areas subject to such use are not recommended for wilderness designation.

Comment: What about the impact of motors and hiking on the wilderness areas surrounding the Colorado River?

Response: See response to Sierra Club - page 41.

28. Howard B. Stricklin

Comment: The use of motors on the Colorado River should be stopped and the river placed in wilderness.

Response: See response to Sierra Club - page 41.

Comment: I would have liked a stronger statement about aircraft overflights.

Response: See response to Sierra Club page 41.

29. J. H. Butchart

Comment: Perhaps the area around Mount Emma should be transferred to Lake Mead National Recreation Area so that hunting could be allowed there.

Response: The Mount Emma area is a scenic and scientifically important portion of Grand Canyon National Monument. It contains the only stand of ponderosa pine in the monument and contains the only Canadian Life Zone within the Grand Canyon Complex. The area contains the Mount Emma Natural Area; a pure, virgin stand of ponderosa pine with all ages of trees represented. This natural area is one of seven such areas within the Grand Canyon Complex, selected by the Society of American Foresters and designated by the Federal Committee on Research Natural Areas, for preservation as prime examples of pristine vegetation types.

Such natural areas of the National Park System are managed for continued use and enjoyment in an unimpaired condition. Animal populations are allowed to live without influence by man and thus hunting is not allowed so as to maintain the special benefits of a natural wildlife population.

30. Stephen C. Jett

Comment: The accompanying maps all show the Colorado River within lower Grand Canyon National Monument as being within the proposed wilderness, contrary to the text.

Response: The maps are in error and the text is correct.

31. Edwin J. and Bernice L. Purcell

Comment: The river should be included in the Grand Canyon Wilderness Proposal and the number of river users should be reduced.

Response: See response to Sierra Club on page 41.

32. Judy Dyke

Comment: The Colorado River should be included in the Grand Canyon Wilderness Proposal and motors eliminated from use on the river.

Response: See response to Sierra Club on page 41.

33. Ray Varley

Comment: Quotas for motorized and nonmotorized trips should be established and the present amount of motorized trips should be reduced. The river should be included in the wilderness proposal for Grand Canyon.

Response: Quotas for motorized and nonmotorized trips have been established and will be utilized as motors are phased-out on the river. The Colorado River is listed in alternative "D" and endorsed for potential wilderness classification. If accepted as such, the river can be classified as wilderness in 1977 when the use of motors on river trips is phased-out. Visitor/use limits are also being reduced, as is explained under "Description of the Environment."

34. Fred B. Eiseman, Jr.

Comment: The Colorado River should be included in the wilderness proposal for the Grand Canyon Complex.

Response: See response to Sierra Club on page 41.

Comment: I feel that the statement about increasing the wilderness area after the wilderness hearings is totally misleading. It implies that attention was paid to the 94 percent who favored more wilderness, whereas, in fact, almost no attention was paid to them at all.

Response: The Preliminary Wilderness Study, January 1971, recommended 505,300 acres of park land for wilderness status. Primarily as a result of public hearings, 512,870 acres are now being recommended for wilderness status. In addition, nearly 92,000 acres have been recommended for potential wilderness status. Various conservation organizations and individuals recommended that the original proposal be increased by approximately 345,205 acres. Thus, nearly 29 percent of the additional land proposed for wilderness at the hearings has been incorporated into the final wilderness proposal.

Comment: There is an inconsistency between the 508,500 acres proposed for wilderness in the Environmental Impact Statement and the 512,870 proposed in the wilderness recommendation.

Response: The figure of 512,870 acres is correct and has been corrected in the Final Environmental Impact Statement.

Comment: The Master Plan conflicts with the wilderness proposal and the Draft Environmental Impact Statement in that it states that the Colorado River provides a wilderness experience, whereas, the river is not being recommended for wilderness.

Response: It is possible to obtain a wilderness experience in an area which has not been officially designated as a wilderness. The river is now being recommended for consideration as potential wilderness in alternative "D," so there is no conflict in spirit.

Comment: The Environmental Impact Statement says that the evolution of life may be traced through 600-million years of time in the rocks of Grand Canyon. The rocks that contain well-documented fossils are all Paleozoic. According to the "Geologic Time Chart for Use at Grand Canyon National Park," (GRCA-EASE-8, EA/1/5), the Paleozonic Era

began 570-million years ago and ended 225-million years ago. This is a span of 345-million years, not 600-million years. Further, the strata do not, by any means, represent "nearly all of the periods of geologic time."

Response: The oldest fossils found at Grand Canyon have been from the Precambrian Era and have a minimum age of 845-million years. The Permian Kaibab Limestone on the rim of the canyon is dated as slightly older than 225-million years, and thus, the figure of 600-million years is representative of the time span involved. Geologic time contains 11 units of time which have been designated as periods. Grand Canyon Complex contains rocks representative of 7 of these periods: Cambrian, Devonian, Mississippian, Pennsylvanian, Permian, Triassic, and Tertiary.

Comment: The visual and audible impact of aircraft upon ground-based observers is worse than ever.

Response: The National Park Service has no jurisdiction over the air space above Grand Canyon National Park, nor can it control landings on nonpark land. Considerable progress has been made in gaining the cooperation of local scenic aircraft operators concerning altitudes and routes of flights over the canyon. Continued cooperation will be sought, as well as regulations from the Federal Aviation Administration to restrict private and commercial aircraft from flying within the canyon.

Comment: The "limitations" placed on the river trippers were not on the basis of individuals, but rather on user/days. They were based exclusively upon what the commercial river operators wanted, not on protection of the environment. This is an out-and-out lie.

Response: River-use limitations for 1973 through 1977 call for a reduction in user/days and a conversion from motorized trips to nonmotorized trips. These use restrictions can hardly be considered as popular with all river concessioners.

Comment: Although the motor boat parties don't do much hiking, they do stop at several standard places. The enormous number of people who flock to these places has already had considerable effect on the areas and may be expected to have an even greater effect unless positive action is taken.

Response: The new River Management Plan detailed under "Description of the Environment," calls for a reduction in visitor use from 14,000 in 1972 to less than 10,000 by 1977. Eight areas along the river are now closed to

camping. They are Redwall Cavern, the Little Colorado River, Hopi Salt Mines, Phantom Ranch, Pipe Creek, Deer Creek Falls, and Havasupai Creek. Other areas will be closed to camping or even to hiking if research and monitoring indicate that environmental degradation is taking place.

Comment: How about the river environment? Since you haven't studied it at all and have no data about the effect of motors and the effect of 105,000 user/days per year on it, how can you make the statement that there are no resources committed to destruction by the proposal?

Response: Although still in its infancy, research on the river environment and sociological research on the character of river users has been taking place. Baseline data is still being obtained which is required to measure human impact on the river environment. This research has top priority in the park and will be expanded during the next few years. Maximum use of the river was in 1972 with 89,000 visitor/user/days. By 1977, this will have been reduced to 55,000 visitor/user/days. As wilderness designation is more restrictive and protective of the resource than the present natural area classification for the river, it is felt that no new resources are being committed to use by the proposed action.

35. Lemoyne Dwight Baquet

Comment: The National Park Service should rescind the 10,000 user/day increase.

Response: This has been done under the new River Management Plan detailed under "Description of the Environment."

Comment: The tourist quota on the river should be reduced to a reasonable value until research provides data to enable a realistic number to be set.

Response: This has been done under the new River Management Plan detailed under "Description of the Environment."

Comment: The National Park Service should provide an Environmental Impact Statement on river use.

Response: A Draft Environmental Impact Statement was prepared to accompany the new River Management Plan detailed under "Description of the Environment."

- A P P E N D I X -

COMMENTS RECEIVED

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
6029 Federal Building, Phoenix, Arizona 85025

November 28, 1972

Merle E. Stitt
Superintendent
National Park Service
Grand Canyon National Park
Grand Canyon, Arizona 86023

Re: L7615

Dear Mr. Stitt:

The draft environmental statement for the proposed Wilderness Classification for Grand Canyon Complex, Arizona, that was addressed to Dr. T. C. Byerly on October 25, 1972, was referred to the Soil Conservation Service for review and comment.

The proposed action does not affect present or planned Soil Conservation Service projects.

We appreciate the opportunity to review and comment on this proposed project.

Sincerely,

George C. Marks

George C. Marks
State Conservationist

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

FEB - 5 1973

Memorandum

To: Superintendent, Grand Canyon National Park

From: Assistant Secretary of the Interior

Subject: Comments on draft environmental statement for proposed Wilderness Classification for Grand Canyon Complex, Arizona (DES 72/97)

In response to your letter of October 25, 1972, the Bureau of Indian Affairs reviewed the draft environmental statement for the proposed Wilderness Classification for the Grand Canyon Complex as it pertains to its particular area of jurisdiction. No conflict with Indian trust lands was identified. Field level personnel indicate that the area included in the proposal had been established as a result of informal communications between the Bureau of Indian Affairs, the Associated Tribal Organizations, and the Representatives of the National Park Service.

The Bureau of Indian Affairs believes the statement adequately reflects the environmental ramifications of this proposal and supports the establishment of the Wilderness Classification for the portion of the Grand Canyon National Park identified in the environmental statement.

Deputy Assistant Secretary of the Interior

IN REPLY REFER TO:

United States Department of the Interior

1792(220)

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

DES-72/97

Mr. Merle Stitt
Superintendent
National Park Service
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

Reference is made to your letter of October 30, 1972, concerning the Draft Environmental Statement for the Proposed Wilderness Classification of the Grand Canyon Complex. The statement did not discuss the amount of inter-agency coordination necessary between our two agencies in relation to jurisdiction of adjacent lands. Further, the possibility for an overall-multi land use program for the Mt. Emma area has not been explored. The current split jurisdiction of the entire area with differing management concepts should be discussed prior to the designation of any given area into a National program.

D. Michael Harvey

Director

OFFICE OF THE DIRECTOR

United States Department of the Interior

BUREAU OF MINES
WASHINGTON, D.C. 20240

November 30, 1972

Mr. Merle E. Stitt
Superintendent, National Park Service
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

We have reviewed the draft environmental statement for proposed wilderness classification of part of the Grand Canyon Complex, Arizona.

Mineral potential of the area proposed for wilderness is not known, but minerals do occur there. The environmental statement would be more complete if it pointed out the possibility of mineral occurrences, such as those of uranium, copper, lead and asbestos.

In the page 1 reference to a patented mining claim in the proposed wilderness, we assume that its 325 acres actually consist of a group of claims under single ownership inasmuch as the standard lode claim consists of 20.67 acres.

If the claims are early day locations for copper and gold, this would add historic interest to the environmental statement. To the reference that the claims have not been worked for more than 20 years should be added the thought that the history of many mines is one where they are reopened several times to produce again under changing economic and technical developments.

Sincerely yours,

Director

United States Department of the Interior

BUREAU OF OUTDOOR RECREATION
WASHINGTON, D.C. 20240

IN REPLY REFER TO:

D7223
Grand Canyon

JAN 9 1973

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
National Park Service
Department of the Interior
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

In response to your letter of October 25, 1972, to former Director Hofe, we have reviewed the draft environmental statement on Grand Canyon Wilderness (DES 72-97) and have the following comment.

Under Alternatives, C. 4. (p. 21), the statement excuses the exclusion of undeveloped rimlands west of Grand Canyon Village on the South Rim because of existing grazing of stock owned by the Havasupai Indians. We do not believe that grazing in itself is incompatible with the Wilderness Act. In fact, some wilderness areas administered by the Forest Service do include areas where there is grazing.

If there are other factors associated with these grazing activities on the excluded area which disqualify the area from inclusion in the proposal, then these aspects should be discussed in the statement. Otherwise, the rationale for excluding this area from wilderness designation appears to be without foundation.

Sincerely yours,

Robert L. Eastman
Assistant Director for
Federal Programs

739

DEC 21 1972

121.

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
National Park Service
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

This responds to your letter of October 25 furnishing a copy of the Draft Environmental Statement for the proposed Wilderness Classification, Grand Canyon Complex, Arizona, for our review.

There appears to be a lack of consistency in the statement regarding the finality of an area designated as wilderness in relation to eventual development of resources within the area. Several places in the statement present material describing the foregone possibility of resource development within a wilderness area, while other sections of the statement present material concerning the possibility for revision of certain restrictions. We suggest that this material be presented consistently throughout the final environmental statement.

We do not oppose designation of this area as a wilderness. However, our interpretation of the law, which has been reviewed and concurred in by the Solicitor's Office, is that weather modification is not precluded in a wilderness area. Therefore, we suggest that the statement recognize the responsibility of the Bureau to conduct a weather modification program in the wilderness area if such a program is found to be desirable.

Restricted access for snow course measurements or for the installation of equipment for precipitation management experiments would seriously handicap maximum use and efficient operation of a watershed in a wilderness area. We believe that any wilderness designation should permit the establishment of and reasonable access to sites for gathering vital hydrologic and climatological data and for conducting precipitation management research activities in connection with the Reclamation program.

We suggest that exhibits A and B in the environmental statement and exhibits A, B, C, and D in the wilderness recommendations be revised to be consistent with the texts. The suggested revisions are necessary to show that the Colorado River, adjacent to the Hualapai Indian Reservation, is not a part of the proposed Wilderness Unit 6.

The statement does not adequately present the position and interests of the local Indian tribes in sufficient detail to fully evaluate the impact the proposed wilderness areas may have on them.

Sincerely,

[SIGNED]

Ellis L. Armstrong
Commissioner

cc:
Regional Director, Boulder City, Nevada
Chief, Division of Management Support, E&R Center
W. O. Code 150, 1500

EMZavalney:pag 12/15/72

ADDRESS ONLY THE DIRECTOR,
BUREAU OF SPORT FISHERIES
AND WILDLIFE

United States Department of the Interior
FISH AND WILDLIFE SERVICE
BUREAU OF SPORT FISHERIES AND WILDLIFE
WASHINGTON, D.C. 20240

NOV 2 1972

Mr. Bruce W. Shaw
National Park Service
Grand Canyon National Park
Grand Canyon, Arizona 86023

We have reviewed the environmental statement for the proposed wilderness area of Grand Canyon Complex, Arizona, and it appears that wildlife interests are adequately covered and we have no further substantial comments to make.

We appreciate having the opportunity to review the environmental statement.

R. E. Johnson

Chief, Office of Environmental
Quality

United States Department of the Interior

GEOLOGICAL SURVEY
WASHINGTON, D.C. 20242

OFFICE OF THE DIRECTOR

November 30, 1972

DES-72-97

Memorandum

To: Superintendent, Grand Canyon National Park, Arizona

From: Director, Geological Survey

Subject: Review of draft environmental statement for the proposed wilderness classification for the Grand Canyon Complex, Arizona

We have reviewed the subject draft environmental statement as you requested in a letter of October 25. Our comments are as follows:

Geology

Aside from a statement on page 1 that mentions negotiations to acquire a patented mining claim of 325 acres in Unit 1, the draft statement does not discuss the mineral resources of the proposed wilderness area. It would be appropriate to include a discussion of the potential effects of the proposal on development of mineral resources near the area.

The Geological Survey has not made a mineral survey of the area. However, data from the literature indicate small deposits of silver, lead, uranium, copper, tungsten, molybdenum, antimony, kyanite, selenium, and tellurium. One lead mine reportedly produced about 92 tons of ore.

Hydrology

The Geological Survey presently maintains a gaging station on the Colorado River. From the map of the proposed wilderness area proposed for the Grand Canyon Complex, it is not possible to determine if the gaging station is within the area or just outside of it. Even if the station

is presently outside the proposed wilderness area, future changes in the river may necessitate moving the station into the area to obtain reliable measurements. Once the area has been designated as a wilderness, operation of the gaging station may be excluded or so restricted that operation of the station will not be feasible. The Geological Survey would like some provision in the proposal that will guarantee access to the present, and any possible future, gaging site.

Henry W Coulter

Acting Director

FEDERAL POWER COMMISSION
WASHINGTON, D.C. 20426

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
National Park Service
Department of the Interior
Grand Canyon, Arizona 86023

Reference: L7615

Dear Mr. Stitt:

This is in reply to your letter of October 25, 1972, addressed to the Commission's Advisor on Environmental Quality, requesting our comments on the revised draft environmental statement for the proposed wilderness classification for the Grand Canyon Complex, Arizona.

The proposed wilderness will not affect existing electric and gas facilities under the jurisdiction of the Federal Power Commission and would not appear to have a significant effect on the development of future supplies and transmission of electric power and natural gas.

Section 605 of Public Law 90-537, approved September 30, 1968, provides that Part I of the Federal Power Act shall not be applicable to the reaches of the main stream of the Colorado River between Hoover Dam and Glen Canyon Dam until and unless otherwise provided by the Congress. This part of the Act includes the Commission's authority to license the construction and operation of non-federal hydroelectric power developments. The boundaries of the proposed wilderness would extend along either one or both banks of the Colorado River within river reaches specified in this section of Public Law 90-537.

Yours very truly,

Kenneth F. Plumb
Secretary

RIZONA DEPARTMENT OF
ECONOMIC PLANNING AND DEVELOPMENT
3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5005

February 7, 1973

Superintendent
Grand Canyon National Park
Post Office Box 129
Grand Canyon, Arizona 86023

Re: Project Title: Proposed Wilderness Classification - Grand Canyon Complex
State Application Identifier: 72-80-0039

Dear Sir:

The Arizona State Clearinghouse has received and reviewed your notification of proposed action concerning the above project. The Clearinghouse review has generated several comments, copies of which are attached for your information.

In accordance with current requirements as set forth in the Office of Management and Budget Circular A-95, Revised, this letter will serve as the State Clearinghouse comment on the proposal.

Please include the above State Application Identifier in any future correspondence regarding this proposal. Thank you for providing Arizona with the opportunity to comment upon this proposal.

Sincerely yours,

Dennis A. Davis, Chief
Planning Section
DAD:lf
encl

-W DAVIS
CHAIRMAN
DY E. CAMPBELL
VICE CHAIRMAN
LTER W. SURRETT
MEMBER
ALTER A. NELSON
MEMBER
EN W. MATTICE
MEMBER

ARIZONA HIGHWAY DEPARTMENT

Phoenix, Arizona 85007

JUSTIN HERMAN
STATE HIGHWAY DIRECTOR
WM. N. PRICE
STATE HIGHWAY ENGINEER

November 13, 1972

72-80-0039

Mr. Dennis A. Davis
Department of Economic Planning
and Development
3003 North Central Avenue
Suite 1704
Phoenix, Arizona 85012

Dear Mr. Davis:

This is in reply to your letter dated October 31, 1972, in which you invited the views of the Arizona Highway Department on the Environmental Impact Statement for the Proposed Wilderness Classification - Grand Canyon Complex.

The Environmental Protection Agency has jurisdiction by law or expertise in all major Federal actions significantly affecting the environment. It is noted that this primary agency is omitted from the list of those who have been asked to review and comment on the statement.

It is anticipated that this environmental impact statment will be of great interest to the Arizona State Parks Board and to the Director of the Arizona State Parks as State Liaison Officer. It is further noted that review and comment were not solicited of this organization.

The proposed park wilderness would have no effect on any existing or presently contemplated projects of the Arizona Highway Department.

Yours very truly,

W G Anderson
for JUSTIN HERMAN
State Highway Director

JH/cm

RECEIVED
NOV 15 1972
RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC

Arizona Power Authority
1810 WEST ADAMS STREET
PHOENIX, ARIZONA
TELEPHONE
(02) 271-4203

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

MAIL ADDRESS
P. O. BOX 6694
PHOENIX, ARIZONA
ZONE NO. 85005

December 13, 1972

72-80-0039

Mr. Robert G. Worden, Chairman
Governor's State Agency Environmental Council
3003 North Central Ave., Suite 1704
Phoenix, Arizona 85012

Re: Revised Draft, Environmental Statement,
Proposed Wilderness Classification,
Grand Canyon Complex, Arizona

Dear Mr. Worden:

This letter is written in response to request for comments on the above referenced environmental statement from the Arizona State Clearinghouse.

The Authority strongly objects to the proposal made by the National Park Service in its environmental statement to designate as wilderness the Marble Canyon National Monument. Included within the Marble Canyon National Monument, which was created by administrative action in 1969, is the Marble Canyon Dam site and the major portion of its reservoir area.

The Marble Canyon site is an Arizona resource by act of the United States Congress. In the Arizona Enabling Act of 1910, Congress, as part of the price of statehood, reserved the continuing federal ownership of and jurisdiction over the hydroelectric sites within Arizona, including Marble Canyon. In 1934, an act of Congress restored to Arizona the inherent equities in the Marble Canyon site given up as a condition to becoming a state. That act (48 Stat. 960), the principal purpose of which was to define the boundaries of the Navajo Indian Reservation, explicitly excluded from the reservation all lands previously designated by the Secretary of the Interior pursuant to the Arizona Enabling Act as being valuable for water power purposes and all lands withdrawn or classified as power site lands. The Act went on to provide that as to such lands, the Federal Water Power Act" * * * shall operate for the benefit of Arizona as if such lands were vacant, unreserved, and unappropriated public lands." Thus an Arizona resource, dealt away as one consideration toward statehood, became available for development by the State for the benefit of Arizona.

The Arizona Power Authority, under its Act of 1944, with Amendments effective through 1956, (Section 30-101, et Seq.,A.R.S. 1956, as amended) as well as under the State Water and Power Plan, enacted March 14, 1967, (Section 45-2501, et Seq.,A.R.S. 1956, as amended) has been directed by the Arizona Legislature to take such steps as may be necessary, convenient and advisable to construct and maintain dams on the Colorado River. The Authority, since 1956, has attempted to fulfill this directive and develop the potential hydroelectric power sites at Bridge and Marble Canyons. The Authority has expended funds in excess of $1,500,000 at Marble Canyon alone for engineering plans and studies, drilling programs, Federal Power Commission license procedures, etc.

The fact that wilderness designation may adversely affect the potential development of the Marble Canyon site is readily exclaimed in the National Park Service's Environmental Statement, page 16, paragraph 3: "The option of constructing dams for hydroelectric, flood-control, revenue-producing, or recreational purposes within the designated area will be foregone if the wilderness proposal is approved. Existing legislation has revoked the authority to construct such dams, and the authority can be restored only by new legislative action. However, the designation of a wilderness area may make such legislative action more difficult to obtain."

Today the people of Arizona are being asked to raise substantial contributions to the Federal Central Arizona Project through increased taxation, in addition to making other payments for the promised water. If Marble Canyon Dam can be developed, the financial assistance it can contribute to the CAP will reduce the amount that would otherwise have to be secured from taxes. In the event Federal appropriations are not forthcoming for the construction of the Central Arizona Project, the potential electric power sites on the Colorado River could well be the key factor in the State's effort to secure this much needed money.

Only review of the history relative to the proposed development of the Marble Canyon site can give expression to the importance that this site has played in Arizona's effort to develop the Central Arizona Project and the reasons why Marble Canyon should not be placed in further jeopardy through a wilderness designation.

In 1958 the Arizona Power Authority submitted to the Federal Power Commission an application for a license to construct, operate and maintain hydroelectric dams at both Bridge and Marble Canyons. However, delays were experienced due to a competing application at Bridge Canyon from the City of Los Angeles and in 1961 hearings on Arizona's application for a license at Marble Canyon finally were held. The Secretary of the Interior's views were expressed at the hearings relative to Arizona's proposal to develop the Marble Canyon site in a letter recommending that Arizona not be granted a license on the basis that, "The Public Interest * * * clearly requires that there be full opportunity to review the entire question of project development and the relationship of Marble Canyon development to the entire Central Arizona Project in the light of the water supply determinations when made by the Supreme Court."

On April 16, 1962, the staff of the Federal Power Commission assigned to Arizona's Marble Canyon case, filed its brief with the Commission. The brief supported Arizona in substantially all respects. On September 10, 1962, the Presiding Examiner for the Federal Power Commission, the Honorable Edward B. Marsh, issued his decision stating "that the public interest required the immediate issuance of a license for the Marble Canyon Project."

In 1963 and 1964 (88th Congress) bills were introduced prohibiting the Federal Power Commission from issuing hydroelectric licenses on this part of the Colorado River for various periods of time (S.502 and H.R.9752) in order to provide time for the Congress to consider some of the issues relevant to the development of the River.

In January, 1967, a new era in Arizona's fight for its rightful share of the Colorado River was launched by Governor Jack Williams. In his opening address to the 28th Legislature he said, "We intend to prepare the plans and secure the licenses which will allow Arizona to construct and operate its own water and power project if such becomes necessary. Arizona needs water now - - - one way or another we are going to get it."

The 28th Legislature responded to Governor Williams by enacting legislation which established Arizona's first State Water and Power Program. This plan was developed through the cooperative efforts of the Arizona Power Authority and the Arizona Interstate Stream Commission. The Act declared that a program for the development and utilization of Colorado River water as well as the development of the State's power resources is for a public purpose and is necessary to the general welfare of the people of the State. This program or plan consisted of the Central Arizona Project, the Hualapai (Bridge Canyon) Project, the Marble Canyon Project, the Montezuma Pumped Storage Project, the Havasu Pumped Storage Project and such other projects as the Legislature may from time to time authorize.

The Act created a State water and power development fund in the treasury of the State. The net revenues from both the water and power projects, as well as any other available moneys, would be placed into this fund to pay off the revenue bonds issued by the Power Authority to finance the projects of the State Water and Power Plan. These bonds would be the obligation of the Arizona Power Authority and would not constitute a debt or liability of the State or any other subdivision of the State. The State Water and Power Plan provided the machinery whereby Arizona could develop its own water and power resources without the aid of the Federal government.

On September 30, 1968, the Colorado River Basin Project Act authorizing the Central Arizona Project became law. Congress passed this Act without including as part of the Central Arizona Project either of the revenue-producing dams at Marble Canyon or at Hualapai. In addition, Sec. 605 of the Act read "Part I of the Federal Power Act (41 Stat. 1063; Title 16 USCA, Sec. 795, et Seq.) shall not be applicable to the reaches of the main stream of the Colorado River between Hoover Dam and Glen Canyon Dam until and unless otherwise provided by Congress." The Federal Power Commission's authority to issue a license to the Arizona Power Authority for its Marble Canyon Project, or its authority to license the Hualapai Project was therefore nullified. In January, 1969, President Johnson issued a proclamation putting the Marble Canyon site into a National Monument.

Today, in order for Arizona to obtain a license to construct a dam at the Marble Canyon site, it must first receive approval of the United States Congress and then meet the stringent license requirements of the Federal Power Commission as well as comply with the National Environmental Policy Act of 1969 (Public Law 91-190). The environmental values of the affected reach of the Colorado River at the Marble Canyon site and reservoir would certainly appear to be adequately protected under these circumstances.

We respectfully submit that no useful purpose would be accomplished by

designating the area encompassing the Marble Canyon site and reservoir area as wilderness. Instead, an unncecessary sacrifice by the State of Arizona would probably result in the foreclosure forever of the potential development of the Marble Canyon site.

Sincerely,

ARIZONA POWER AUTHORITY

Marshall Humphrey
Chairman

MH/jpb

JACK WILLIAMS
Governor

ARIZONA STATE LAND DEPARTMENT
1624 WEST ADAMS
PHOENIX, ARIZONA 85007

RECEIVED
DEC 8 1972
STATE CLEARINGHOUSE
DEPARTMENT OF PLANNING & DEVEL

December 7, 1972

ANDREW L. BETTWY
Commissioner
271-4621

To: Mr. Dennis A. Davis
Department of Economic Planning and Development
3003 N. Central Av. Suite 1704
Phoenix, Arizona 85012

From: State Land Department
W. H. Edwards

Subject: Environmental Statement Review

Applicant: Grand Canyon National Park

Project Title: Proposed Wilderness Classification - Grand Canyon Complex

State Application Identifier: 72-80-0039

The State Land Department has no comment on the above cited project.

W. H. Edwards

Accounting
271-4624

Commercial
271-4626

Forestry
774-1425
Flagstaff

Records & Processing
271-4634

Mineral Oil & Gas
271-4628

Sales
271-4634

Soil Conservation
271-4625

Water Control
271-4629

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CHAIRMAN

JOHN S. HOOPES
VICE-CHAIRMAN

WESLEY E. STEINER
EXECUTIVE DIRECTOR
AND
STATE WATER ENGINEER

Arizona Water Commission

222 NORTH CENTRAL AVENUE, SUITE 600
Phoenix, Arizona 85004
TELEPHONE (602) 258-7561

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PETER BIANCO
LINTON CLARIDGE
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EXOFFICIO MEMBERS
ANDREW L. BETTWY
MARSHALL HUMPHREY

RECEIVED
DEC 5 1972
RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

MEMORANDUM

TO: Arizona State Clearinghouse

FROM: Wesley E. Steiner, Executive Director
Arizona Water Commission

DATE: December 4, 1972

SUBJECT: Environmental Statement Review, Proposed Wilderness Classification - Grand Canyon Complex - 72-80-0039

The statement is inadequate in its handling of the question of constructing dams and reservoirs within or near the proposed wilderness area. The relationship between the proposal and the hydro-electric developments which have been considered in the general area should be fully developed. Hualapai and Marble Canyon dams and reservoirs should be located on the maps in the report, and the existing requirements for the development of these resources should be compared with the requirements which would exist should the proposal be implemented. Some type of quantification such as a comparision of the acreage required for the hydro-electric developments with the total acreage of the proposed wilderness should be provided.

The discussion of irreversible and irretrievable commitments of resources should recognize the existence of at least two types of resources - stock and flow. Non-utilization of the hydro-electric potential of the Colorado River as it flows through the canyon area constitutes an irreversible action. The energy lost every hour could be substituted for energy which we otherwise obtain from coal, oil, or natural gas, relatively stock resources which are not considered renewable.

While we feel that the statement is not objective with regard to hydro-electric development, we are not suggesting that the proposal be suspended because of this inadequacy. If the above deficiencies are corrected and the part of the proposal relating to repeal of the reclamation language in the Act of February 26, 1919, is deleted, we will withdraw our objections to the wilderness designation.

72 Wesley E. Steiner TCC

ADVISORY COUNCIL
ON
HISTORIC PRESERVATION
WASHINGTON, D.C. 20240

November 22, 1972

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

This is in response to the request for comments on the Draft Environmental Statement prepared for the proposed Wilderness Classification for Grand Canyon Complex, Arizona, sent to us on October 25, 1972.

Your draft environmental statement appears adequate regarding our area of expertise. It would appear that the wilderness classification will serve to protect and enhance the historic values of the Grand Canyon Complex. We commend you on a draft statement which is both thorough and readable.

Thank you for this opportunity to comment.

Sincerely yours,

John D. McDermott
Acting Executive Secretary

THE COUNCIL, *an independent agency of the Executive Branch of the Federal Government, is charged by the Act of October 15, 1966, with advising the President and Congress in the field of Historic Preservation, commenting on Federal, federally assisted, and federally licensed undertakings having an effect upon properties listed in the National Register of Historic Places, recommending measures to coordinate governmental with private activities, advising on the dissemination of information, encouraging public interest and participation, recommending the conduct of special studies, advising in the preparation of legislation, and encouraging specialized training and education, and guiding the United States membership in the International Centre for the Study of the Preservation and the Restoration of Cultural Property in Rome, Italy.*

Sandstone Sculpture, Peach Wash, Arizona

SIERRA CLUB *Southwest Office*
2014 East Broadway, Room 212, Tucson, Arizona 85719

November 28, 1972

Merle Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle:

Enclosed are the Sierra Club comments on the revised environmental statement on the proposed wilderness classification for the Grand Canyon Complex. I hope that you will find these of value as you prepare the final environmental statement.

Sincerely,

John

John A. McComb
Southwest Representative

JAM:ab

Enclosure

COMMENTS ON
REVISED ENVIRONMENTAL STATEMENT
PROPOSED WILDERNESS CLASSIFICATION
GRAND CANYON COMPLEX

Prepared by
Sierra Club Southwest Office
November, 1972

1. Motorboats and Aircraft

Part of a reasonable definition of wilderness and part of the Wilderness Act is a prohibition on motor vehicles, motorized equipment, motorboats, or mechanical transport of any kind. The only exception would be administration where reasonable people would agree no alternative is available or for emergencies.

A canyon wilderness, in particular, suffers greatly from the effects of motor transport because the walls enclose a volume of space that might otherwise be considered above or outside a wilderness. Any of the several pollutions can be contained and even magnified in this space between and below the rims.

Unlike access routes to other wildernesses, a canyon river is in the wilderness. Boats travelling the river in a non-wilderness fashion are the equivalent of motorbikes travelling mountain trails. We cannot define two pieces of canyon wilderness, one on either side of the river, for the river is not access to the wilderness, it is a route in the wilderness.

The environmental impact of motors in the Grand Canyon is such as to render meaningless the designation if they are allowed on any regular basis within the space defined by the Canyon walls and rims. This is explicitly admitted on page 11 (second full paragraph) of the revised draft environmental statement, and implicitly acknowledged by the discussion on scenic flights on page 10, by the statement "efforts are continuing to reduce the effects of these flights upon the area recommended for wilderness designation."

Taking into account reason, the law, the inward orientation of canyon wilderness, and the hopelessly adverse effects of motors on wilderness, we believe that:

1) Motorized transport on the river should cease, and the river be designated as wilderness;
2) Motorized air transport should be confined to 10,00 above sea level for any craft above the Canyon

2. Grazing

Assistant Secretary Reed's June 24, 1972, memorandum setting forth wilderness proposal guidelines for parks and refuges made it clear that areas need not be excluded from proposals because of prior rights or privileges, such as grazing or stock driveways. While it might be politic to leave out lands where the Havasupai do graze, we cannot agree that lands with genuine wilderness values should be left out of the wilderness system.

The greater part of Havasu Canyon, the lands above it, particularly on Great Thumb Mesa, and east to Grand Canyon Village, are lands that are and ought to be

enjoyed as wilderness lands. Since the Havasupai would be in no way affected by such designation and since the lands are undeveloped, we feel that part C.4 of the Alternatives (page 21) should be revised in accordance with Secretary Reed's guidelines of June 24, 1972.

3. Burning on the North Rim

Much is made of the controlled burning program to be conducted on the North Rim, the aim of which is to return the area to natural care. We agree with this aim, but do not see why it is necessary to include part of the area to be burned, and leave out the rest. Section 4 of the proposed Grand Canyon Wilderness bill would give authority to do whatever prescribed burning is necessary in any of the wilderness. Since the only reason cited for leaving out undeveloped North Rim lands is the management program to reduce excessive fire build-up, (C.5, p.21) we recommend that the Park Service be consistent and agree to the designation as wilderness of the remaining North Rim undeveloped lands.

4. Bright Angel Corridor

We still cannot understand the need for so wide a corridor, since it can have nothing to do with inpact on the rest of the wilderness, and is not required for administration or maintenance. We strongly suggest bringing the corridor up to the developments, and certainly no more than fifty feet away.

5. Coordination with Lake Mead National Recreation Area

We urge that there be coordination of proposals from the two areas so that protection within one area will not be negated by development in the other.

More important, the Grand Canyon is one place; the interpretation if it ought to be unified. This goal would be aided by a singly named and designated Grand Canyon Wilderness.

6. Discussions with the Indian Tribes

The Navajo and Hualapai tribes own and/or contest prime wilderness lands. Since the development of these lands could lead to the degradation of the Park Service administered wilderness, we urge that every effort be made to work with the two tribes, as well as with the Havasupai, to show them the values, including economic, of leaving these lands undeveloped. In the long run, these lands as wilderness will be a long-lasting, low-cost boon to the tribes.

7. Use of the Wilderness

We are in agreement with the need to regulate hiking and boating use of the Grand Canyon Wilderness. We wish to see these values we are fighting for protected, and for that purpose are willing to see restrictions on our personal recreational enjoyment.

We would, however, urge that serious thought be given to the somewhat sad statistic that only two percent of the visitors have any other than visual contact with the wilderness. A wilderness experience does not necessarily require back-pack or boat. A short walk, led by an interpretive ranger, down the Kaibab trail would do much to awaken the meaning of a canyon wilderness within the visitor.

Limitations on interpretive staff are damaging to the visitor's enjoyment of the park and wilderness, and thus ultimately damaging to his understanding of wilderness, park, and environmental values that the Park Service is fostering.

Boundaries are important; implanting respect for the land within the boundaries and the environment necessary for its survivial is paramount. We urge the expansion of the interpretive staff in order to promote active appreciation of the Grand Canyon Wilderness by all visitors.

November 22, 1972

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle:

Thank you for sending the revised Draft Environmental Statement for the proposed Wilderness Classification for Grand Canyon Complex, Arizona. I have read the statement as Chairman of the Plateau Group of the Sierra Club and also as Geologist for the Museum of Northern Arizona and can find nothing objectionable in this statement.

We all know that the more wilderness there is the less impact this in turn has on the environment.

Best wishes.

Sincerely,

William J. Breed
Curator of Geology

WJB/dd

C.P.E.A.C.
COLORADO PLATEAU ENVIRONMENTAL ADVISORY COUNCIL

POST OFFICE BOX 1389 FLAGSTAFF, ARIZONA 86001

30 October 1972

Mr. Merle E. Stitt
Superintendent
National Park Service
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

In response to your 25 October request for my review of and comment on the Draft Environmental Statement for the Proposed Wilderness Classification for the Grand Canyon Complex, I believe it to be a good analysis of the land most appropriate for such use.

Especially important is the reality that wilderness can be developed for other purposes in the future but development of such land now destroys the possibility of using it for wilderness in the foreseeable future.

Sincerely,

Eric G. Walther

Eric G. Walther
Executive Director

EGW/jp

Northern Arizona University · FLAGSTAFF, ARIZONA 86001

SCHOOL OF FORESTRY
BOX 4098

OFFICE OF THE DEAN
(602) 523-3031

November 9, 1972

Re: L7615

Mr. Merle E. Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt,

I appreciate the opportunity to review the Draft Environmental Statement of the proposed wilderness area at Grand Canyon.

The Park Service has done an excellent job on this and with the hearings that preceeded. You and your staff are to be congratulated.

Speaking as a poorly informed private citizen, my only question (and qualms) regarding the proposal are with paragraph four, page nine. Have the rights of the Havasupai and Hualapai Indians been properly considered and properly observed. After reading the letters from both tribes in the "Wilderness Recommendation," I cannot see where their concerns have been considered in the Environmental Statement! The Navajos seem to have won their battle, but the other two tribe's complaints seem to have been ignored!

Again, thanks for the opportunity to respond. All other aspects of the Statement meet with my full approval.

Sincerely,

Charles O. Minor
Dean

COM:gm

Museum OF NORTHERN ARIZONA

November 22, 1972

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle:

Thank you for sending the revised Draft Environmental Statement for the proposed Wilderness Classification for Grand Canyon Complex, Arizona. I have read the statement as Chairman of the Plateau Group of the Sierra Club and also as Geologist for the Museum of Northern Arizona and can find nothing objectionable in this statement.

We all know that the more wilderness there is the less impact this in turn has on the environment.

Best wishes.

Sincerely,

Bill

William J. Breed
Curator of Geology

WJB/dd

FORT VALLEY ROAD · P. O. BOX 1389 · TELEPHONE 774-2433 · FLAGSTAFF, ARIZONA 86001

EDWARD B. DANSON
Director

Museum OF NORTHERN ARIZONA

November 3, 1972

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle:

I have reviewed the Revised Draft Environmental Statement, Control Number DES 72-97, for the Grand Canyon Wilderness area.

There is, on page 4, a rather poorly worked sentence concerning man in the Canyon area. In the third paragraph, third line, I would suggest that the sentence read, "The Desert Cultures, Cohonina, Kayenta and Virgin Branches of the Anasazi, as well as remains of the later Paiute, Hopi, Navajo, and Havasupai have left evidence.....". To anyone who knows about the prehistory of the area, this sentence mixes up tribes, cultures, and branches of cultures in one sentence.

As for the rest, except for leaving the River out of the Wilderness, which is a moot point, I think you have a very good Wilderness Proposal.

All the best. Hope to see you soon.

Sincerely,

Ned

Edward B. Danson
Director

/e.d.

EBD/ed

FORT VALLEY ROAD · P. O. BOX 1389 · TELEPHONE 774-2433 · FLAGSTAFF, ARIZONA 86001

THE ARIZONA REPUBLIC

P. O. BOX 1950 -- 120 EAST VAN BUREN STREET
PHOENIX, ARIZONA 85001

Mr. Merle E. Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Ariz. 86023

Dear Sir:

I have reviewed the draft environmental impact statement on the proposed Grand Canyon Wilderness.

I find it inaccurate and misleading in one particular. It ignores the bad effects of the use of motors, and the pressures of commercial river runners on the environment of the inner canyon and river, yet this impact was the principal topic at the wilderness hearings, and was described by most witnesses as a bad impact.

The river is a water trail ~~thenxhxthx~~ through the Grand Canyon--no more and no less. Even on the corridor trails the National Park Service does not allow the use of motorized vehicles, and there is absolutely no excuse for the use of motors on the river.

The impact statement makes no mention of the concern expressed by the Arizona Academy of Science and others concerning the impact of the increasing numbers of river travelers, and it mentions no alternative to the use of motors.

If the motors were eliminated, the river could be included in the wilderness, assuring better protection of wilderness values. It is not enough ignore this subject with the comment that river travelers are hikers. They come in such numbers and congregate in such numbers with their portable toilets, butane stoves, and beer-laden iceboxes that their impact simply cannot be considered in the same breath with wilderness hikers.

The impact statement should devote more analysis to the impacts resulting from the corridor. If additional tourist facilities are provided at Cottonwood additional impact will result.

I have not had time to prepare a more analytical statement, but I hope these observations will be helpful.

Sincerely,

Ben Avery

THE DESERT PROTECTIVE COUNCIL, INC.

A NON-PROFIT ORGANIZATION

To safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual and recreational value and to educate by all appropriate means children and adults to a better understanding of the desert.

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H. WOODIN
Sonora Desert Museum

November 19, 1972

Superintendent Merle E. Stitt
Grand Canyon National Park
Grand Canyon, AZ 86023

Dear Superintendent:

Thank you for your October 25, 1972 request for our comments on the Draft Environmental Statement for the proposed Wilderness Classification for the Grand Canyon Complex. Since testifying at the South Rim hearings on this subject in May, 1971 we have been anticipating Park Service reactions with great interest.

In general we are pleased with your well-presented Environmental Statement. We like to see that you are recommending some 55% of the Grand Canyon complex acreage for wilderness designation as well as another potential 10% to be specifically provided in the establishing legislation. We presume that your recommendations eliminate the peripheral management corridors consistent with the recently announced change in National Park Service policy.

There are two aspects of the Statement about which we have reservations:

1. Exclusion of the Colorado River from wilderness status to allow for motorized boat use. We feel that such use should be cut back and eliminated rather than allowed to gradually increase, as under present Park Service policy. The motor noise spoils the wilderness experience both for boat users and overland vistors to the inner canyon. Present heavy use resulting from the present rapid motor boat tours is damaging and polluting the campsites.

2. Overflights spoil the wilderness experience of land surface visitors to the Canyon with their horrendous loud echoes. We believe that flights below rim levels are inexcusable except for urgent management business.

Respectfully,

Robert G. Bear

Robert G. Bear
Executive Director

Copy to Howard Chapman

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TUCSON AUDUBON SOCIETY

P.O. BOX 3981 TUCSON, ARIZONA 85717

Mrs Charles Coston, Wilderness Committee
301 S. Eastbourne, 85716

November 21,1972

Mr. Merle E. Stitt
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt;

The members of the Tucson Audubon Society Wilderness Committee have reviewed the revised Wilderness plan for Grand Canyon and the draft environmental statement.

We are delighted to see some of the changes since the wilderness hearing. We have never favored the 1/8 mile mangement zones we are glad you have seen the wisdom of eliminating them. The addition of units B and C to the wilderness is a wise move. We wish to congratulate you for the fine plan to designate potential wilderness units to become wilderness when grazing has ended. Not only does this afford a kind of special status to these areas but saves all of us the time, trouble and expense of another wilderness hearing.

As fine as the above mentioned changes are, our group feels you still haven't added all the area deserving wilderness status.

The present problem with sanitation on the river proves the need to control the number of river runners. We would like to see motors banned from the river, and it included in wilderness.

The revised plan eliminats most of the management zones, we think all could be done with self. What possible good does a 500 feet wide zone next to BLM owned land do for a wilderness area that's mostly vertical? Nor do we tkink a zone is necessary because of past logging.

The east side of Marble Canyon should be kept in wilderness until proven that it is Indian land.

In conservationist unit C we feel the existing best road to Point Sublime should be kept open but the rest of the area should be included in your potential wilderness classification to be added later.

Conservationist designated unit B can be included in wilderness or potential wilderness.

In unit B wilderness should surround the road out to Cape Royal.

Near Mount Emma, Toroweap and eastward from there, allowing some roads to remain for a primitive back road experience is a fine idea.

conservation education recreation

It seems like not all of the existing network of roads need to remain some could be closed and wilderness status given to more area above the rim. Additional land above the rim could be included by including units G and H, the very sparse grazing practiced by the Indians should not prevent wilderness designation.

We do not think the draft environmental statement covers the problem of sanitation of the river very well and problem needs to be discussed at length. Also needed is a discussion of wilderness for the river.

No estimate of the potential for timber use, grazing or possible mineral deposits are mentioned in the draft. The potential needs to be mentioned and that park status precludes development of these resources so that designation changes nothing in this regard.

The subject not covered as fully as possible is the possibiblity of extending the wilderness area to include the area mentioned earlier in this letter.

The discussion of the general nature of Grand Canyon and the problems of visitor use is very good in the Draft Environmental Statement.

Sincerely,

Eva Coston

Mrs Charles Coston

MR. WILLIAM OSBORN
P. O. BOX 708
SEDONA, ARIZ. 86336

Mr. Jon F. Haman,
Resource Specialist
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr Haman

Thank you for sending the revised Draft Environmental Statement "Proposed Wilderness Classification, Grand Canyon Complex" to me for the Northern Arizona Audubon Society.

In Dec. '72 the National Park Service announced that the proposed wilderness classification within the Grand Canyon was amended. Motorized boats on the river would be phased out by 1977, so that the river itself could be included in the wilderness category in agreement with the great preponderance of opinion expressed at the hearing in Phoenix in May, 1971.

The active opposition to this by operators of motor trips on the river by letters to Arizona and Utah congressmen and to the National Park Service must be met by letters from conservationists upholding the phasing out of motor trips. The natural, wilderness quiet and wild sound will be restored to be enjoyed in non-motorized boats, on mule back and on foot. This is the only way to have the wilderness experience belonging to this unique stretch of river. The problem and the non-motor boat trips increases.

As a concerned citizen who feels strongly about this area and that it should be left as it is, to paraphrase Theodore Roosevelt, I urge that the Park Service amended plan announced in Dec. 72 be implemented as the right decision in regard to this heritage in the interest of the present public and the unborn inheritors of it to come.

Sincerely, William P. Osborn

1342 Jewell Ave.
Pacific Grove, California 93950
Telephone (408) 373-5882

WILDERNESS WORLD

Nov. 3, 1972

Merle E. Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Mr. Stitt:

Thank you for sending us the copy of the Draft Environmental Statement for the Proposed Wilderness Classification for Grand Canyon Complex.

We would like to submit our view that the Colorado River itself should be included within the Grand Canyon Complex Wilderness Classification. It seems strange to us that the river, which is main artery of the entire Grand Canyon, one of the world's great wonders, should be excluded. The entire environment - the water, the wild life, the flora - is one ecological complex, and what affects the Colorado River will surely affect its peripheral zones whether or not they are within the "wilderness" classification. Pollution and noise caused by motors, for example, do not simply affect persons on the river, or riverine life. They drive away wild life, they poison the water supply, they have an effect of "visual pollution" as well as an effect on the nervous system of human beings through noise levels.

What of the hiker who leaves civilization behind, hiking for miles to reach the river, and then is faced with a series of motor-driven rafts? What happens to his "wilderness" experience then?

As for river travelers, there are increasing numbers who agree with us that motors have no place in a wilderness, and they resent the intrusion of motor-driven boats in the peaceful Grand Canyon scene.

It is not logical to ban an area from inclusion in a wilderness classification simply because of the existing use of motors. Let's get rid of the motors, not the wilderness!

There is precedence for this. Many other rivers and regions have received wilderness classification even though motor-driven boats were in use on the rivers. The effort then is to ban or phase out use of motors as a part of the management plan for the area. This is the approach which we feel the Grand Canyon deserves.

There seem to be several alternatives:

1) Ban all use of motors immediately. Present outfitters can switch to oar-power by 1974.
2) Ban motors at end of present concession license period (5 years).
3) If neither of these is possible, at least make a provision for scientific studies to be made to determine extent of all types of pollution and disturbance caused by motors, not only on the river itself but in surrounding areas.

"In wildness is the preservation of the world"

Wilderness classification then could be re-proposed in light of these findings.

(It might be argued that because we are an outfitting company which now runs only oar-powered trips on Grand Canyon, we have a special interest in opposing motor trips. The truth is that our company may well suffer if all other companies turn to oar-power. At this point we have a certain special appeal to those who prefer oar power for various reasons. That special status will be lost, if all motors are banned, and we will be competing on an even basis with companies of well-established name and resources far greater than our own.)

Our interest in the Grand Canyon and the Colorado River goes far beyond our economic concern. We love the area and want to see it preserved in all its loveliness for our children and future generations. The river deserves the protection of wilderness classification, forever.

Sincerely,

Vladimir Kovalik
Ron Hayes

Vladimir Kovalik
Ron Hayes

cc: Mr. Nat Reed, Assistant Secretary of the Interior
U.S. Department of the Interior
Washington, D.C. 20240

Mr. Howard Chapman
Director, Western Region, National Park Service
Box 36063
San Francisco, CA 94102

November 24, 1972

Mr. Merle Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle:

Per your request in your letter dated October 26, subject "Draft Environmental Statement", the following comments are offered.

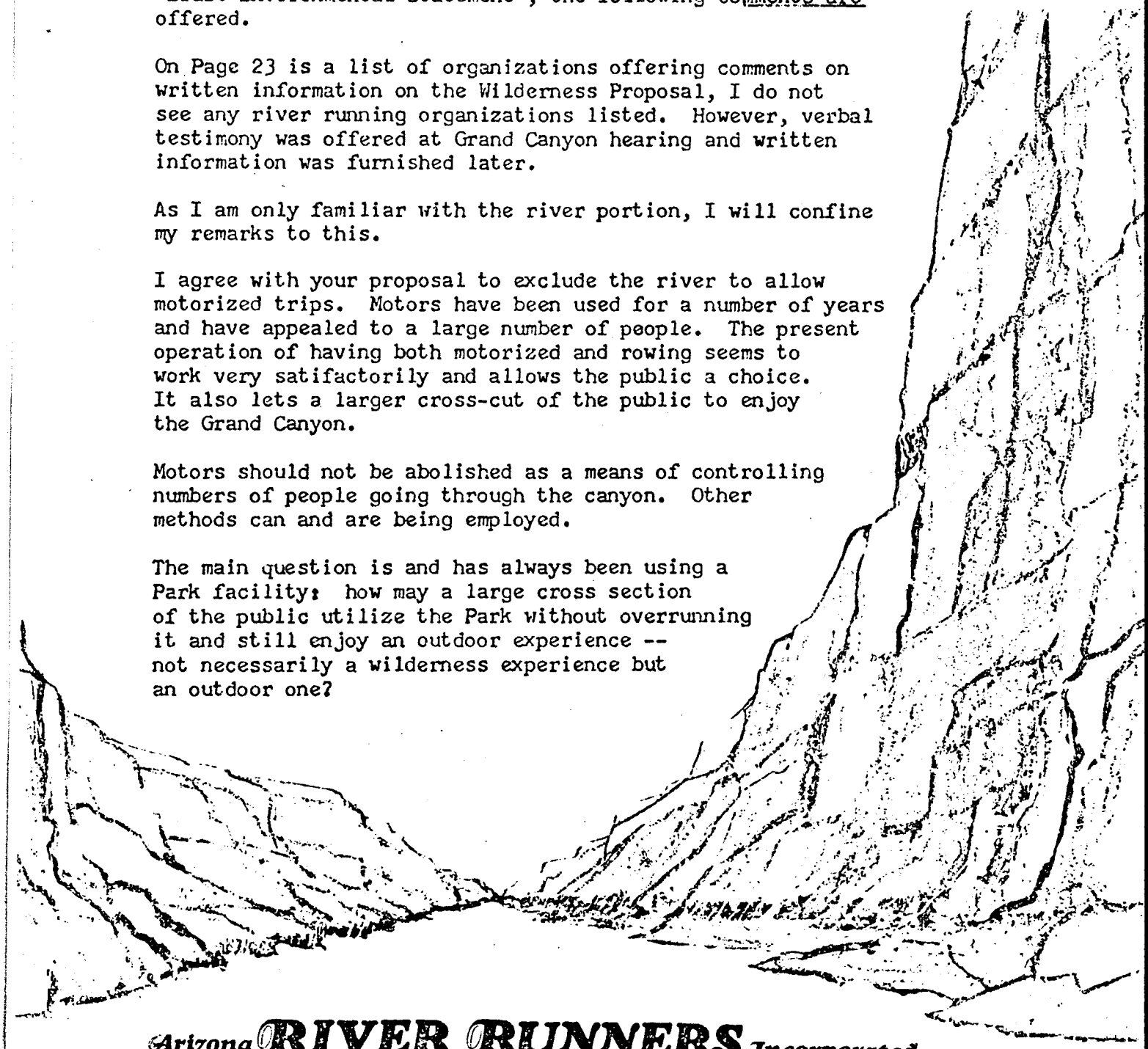
On Page 23 is a list of organizations offering comments on written information on the Wilderness Proposal, I do not see any river running organizations listed. However, verbal testimony was offered at Grand Canyon hearing and written information was furnished later.

As I am only familiar with the river portion, I will confine my remarks to this.

I agree with your proposal to exclude the river to allow motorized trips. Motors have been used for a number of years and have appealed to a large number of people. The present operation of having both motorized and rowing seems to work very satifactorily and allows the public a choice. It also lets a larger cross-cut of the public to enjoy the Grand Canyon.

Motors should not be abolished as a means of controlling numbers of people going through the canyon. Other methods can and are being employed.

The main question is and has always been using a Park facility: how may a large cross section of the public utilize the Park without overrunning it and still enjoy an outdoor experience -- not necessarily a wilderness experience but an outdoor one?



Arizona RIVER RUNNERS Incorporated
P.O. BOX 2021 MARBLE CANYON, ARIZONA 86036
PHONE: (602) 355-2107

Parks have never been set up with the idea they were wildernesses. Portions of the Park may adapt itself to this purpose but not all.

We should bear in mind that Parks are for the benefit of all the people - not just a few who would have it designed so as to be available to a chosen few. I believe your proposal as it now stands does benefit all of the people.

There are those who would tell us how to enjoy the outdoors and this may have some merit as a guide. But there is a fine line between what we would like to do and what is best for the majority.

People come out of the canyon remembering many things and no two seem to come out with exactly the same impression. To some it is geology, others the rapids, others the solitude or companionship; only an egotist would say he had the only answer.

The crux of river trips seems to be a wilderness trip. Let us give some consideration to calling it an outdoor experience.

People refer back to earlier trips as wilderness experiences. This was a time when garbage was left in the canyon and trash thrown in the river. Everyone excreted anywhere. Do we want to go back to this? I don't believe so. Does it make a wilderness trip if you row but take porta-pottis, gas stoves, space age dried food and have helicopters and fixed wing flights overhead?

Let's call it what it is: an outdoor experience and make it available to a cross section of the public with reasonable length trips at a reasonable price. Motorized trips allow families of moderate means the chance to experience the canyon as a family. Isn't this part of the overall goal?

In summary, there is room for both rowing and motor trips and still control the number of people so we may maintain its present state for future generations.

In view of the comments above, it would be advisable to present my credentials:

I was born in the middle of the Sierra Nevadas on the Kern River. I lived over twenty years in this area. I have built trails all over the area. I worked on pack and foot bridges, spent winters trapping in the high Sierras over 70 miles from civilization, spent entire summers cowboying in the Mount Whitney area and am mentioned in at least one history book on these mountains.

Further, I was one of the first soldiers to be picked for forming the U.S. Army mountain troops which later became the 10th Mountain Division of which some of our foremost conservationists were members.

I trained troops for several years both in the Cascades and Rocky Mountains, spending weeks at a time miles from civilization and taught people how to survive in the outdoors at extreme altitudes.

This, plus a number of years on the Colorado River, both as a boatman and operator certainly should give me some insight on an outdoor experience.

These comments are respectfully submitted and hopefully will be given due consideration.

Sincerely,

Fred

FRED BURKE

cc: Jim Ruch, Department of the Interior

Wonderland Expeditions

Ken Sleight
P.O. Box 338
Green River, Utah 84525
Telephone (801) 564-3317

River and Canyon Trips
Also Canyon Hiking
and Backpacking

November 12, 1972

Grand Canyon National Park
Grand Canyon, Arizona

SUBJECT: REVISED STATEMENT - PROPOSED WILDERNESS CLASSIFICATION
TO: Supt.

Thank you for this opportunity of commenting upon the Statement. I feel the statement is far from complete - that it fails to treat many factors in the detail intended.

Page 20...

Certain areas of the Colorado River itself are not used for the use of conducting motor-driven trips. Rocks, shoals, island and other obstacles precludes the use of motors in these areas. And they are extensive. Then why have you not shown why they are not to be included in the wilderness proposal.

Your brief statement regarding the Colorado administration regarding motors is inadequate and incomplete. It does not treat just how continued motor use on the Colorado would effect the proposed adjoining wilderness areas.

Page i...

Your Alternatives to the Proposed Action is incomplete. One of the alternatives for the river could be a "conditional-use area" or some designation permitting use of motors on a non-conforming basis.

Page 12 ...

Regarding river travel you say the "proposed action will have no effect on these trips." All river travelers will indeed have to conform to strict compliance of wilderness act regulations. Then you say, "these trips may have some effect on the proposed wilderness..." It should be stated precisely just how they will effect the wilderness. Hiking is but one effect. The sounds and smells of outboard motors is yet another.

Page 13...

Your statement that "opportunities for such hiking are limited" is not factual. There is much evidence of hundreds of trails radiating outward from the river. Heavy use in areas such as Deer Creek, Elves Chasm, Tapeats and Havasu Creek supports this - that those opportunities to hike and visit the wilderness are not limited.

Sincerely,

Ken Sleight

Ken Sleight

1837 Sherwood Drive
Prescott, Arizona 86301
November 16, 1972

Mr. Merle E. Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

Dear Merle,

Thanks to you and your staff for the opportunity to review and comment on the draft statement on Wilderness Classification for the Grand Canyon Complex.

I am entirely in accord with the proposed Wilderness classification with the exception of the exclusion of the Colorado River. As I have maintained consistently from the beginning of the Wilderness Classification Study, the River is one of the main features of the Grand Canyon Wilderness, and should be preserved as such. Modified by man, and upstream dams, yes; but still the central feature of the Park's being.

I know the Service's official position is that motors on boats are necessary for safety reasons, and that motors are not compatible with wilderness. (However, this reasoning is not pursued in the draft statement.) To me, this appears to be a very weak, perhaps even specious argument. The recent casualties on the river trips that I know of have been due in large part directly to the motors or their accessories. It appears to me and to many others with whom I've discussed this point that pressure from the most highly commercialized of the river runner companies, who wish to make frequent and fast trips, is the underlying reason, and I do not believe it can be adequately justified. If I am wrong, and it can be definitely proved that motors are necessary for safety, then I believe that the Wilderness Act is flexible enough to permit motors. In any event I hope the Colorado River can be included in the Wilderness classification.

There are a good many misspellings of place names and other words throughout the text which I assume will be carefully edited and corrected. On page 12, for instance, the word "regardless" has an extra syllable in front of it! And the Audubon Society will surely object to the spelling of its name.

I would have liked a stronger statement about aircraft overflights, but perhaps that will be emphasized more specifically and restrictively in the Master Plan, which I assume is still in the draft stage.

Thanks again for this chance to comment.

Sincerely yours,

Howard B. Stricklin

Howard B. Stricklin

1025 Hopi Drive
Flagstaff, Arizona 86001
Nov. 1, 1972

Merle E. Stitt, Superintendent
Grand Canyon National Park
Grand Canyon, Arizona

Dear Mr. Stitt,

I regard the revised draft of the environmental statement for the establishment of wilderness areas in the park as a fine document. I concur heartily with all of the views presented.

Although I am not a hunter myself, I would wonder whether the best use of the area around Mt. Emma would be as national park where hunting is prohibited. I certainly wouldn't object to it being maintained as a wilderness area, but perhaps it should be a part of Lake Mead Recreational Area where hunting is permitted. I don't suppose it would attract other visitors than hunters. Of course it could also be used by weekend and longer hikers.

Although I am a member of the Sierra Club, I go along with you 100% in keeping open the fire roads of the north rim. As you have said, they are needed for forest management, but they can also be used in scientific studies of geology and natural history. They are also valued by men like me who wish to see the canyon from different points along the rim or to follow the ancient Indians down into the canyon by long forgotten routes.

Along this line of thought, I would favor some improvement of the road to Swamp Point so that in dry weather it could be driven without danger by an ordinary car or pickup. It would also please me if some improvement were carried out on the road leading up on the Great Thumb Mesa. Besides the Great Thumb Trail, I know of seven ways to get off the rim, but it is most of one day's hike from the Topacoba Hilltop Road to reach the takeoff points.

Sincerely,

Harry

J. H. Butchart,
Dept. of Mathematics, NAU

UNIVERSITY OF CALIFORNIA, DAVIS

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DEPARTMENT OF GEOGRAPHY DAVIS, CALIFORNIA 95616

6 November 1972

Mr. Merle E. Stitt
National Park Service
Grand Canyon
Arizona 86023

Dear Supt. Stitt:

I appreciate being asked to comment on the draft environmental statement relating to the proposed Wilderness classification within the Grand Canyon Complex.

As far as I can determine, the content of the statement is entirely satisfactory. I might add that the present Wilderness proposal is a distinct improvement over the original one.

I do find a few editorial errors in the draft statement. "Hualapai" is misspelled on page 9, "irregardless" on page 12 should have the first two letters deleted, and "strata itself" on page 13 should read "strata themselves." The accompanying maps all show the Colorado River within lower Grand Canyon National Monument as being within the proposed Wilderness, contrary to the text.

Sincerely yours,

Stephen C. Jett

Stephen C. Jett
Associate Professor

SCJ:kal

DR. EDWIN J. PURCELL
1702 LIND ROAD
TUCSON, ARIZONA 85719

October 31, 1972

SUPERINTENDENT
Grand Canyon National Park
Grand Canyon, AZ

Dear Sir:

That today's threat to the Grand Canyon comes from the Park Service is unthinkable! The enormous and increasing numbers of motor boat loads of tourists on the Colorado River is a disaster. The river should be included in the Grand Canyon Wilderness proposal.

We urge that the proposed 10,000 user-day increase be rescinded. Furthermore, you should reduce the tourist quota to a reasonable number, something less than 10,000 user-days annually until studies can be made and a realistic number can be determined.

We believe that the Park Service should make those studies and provide an Environmental Impact Statement on river use.

We sincerely hope for some action in this matter before it is entirely too late.

Sincerely,

Bernice Lee Purcell
Edwin J. Purcell

Bruce Dyke Photography
2215 VENTURA BOULEVARD
CAMARILLO, CALIF. 93010

November 24, 1972

Mr. Nat Reed
Assistant Secretary of the Interior
U.S. Department of the Interior
Washington, D. C. 20240

Dear Mr. Reed,

I am writing this letter to express my opinion against the proposal to exclude the Colorado River from the Wilderness Classification plan for the Grand Canyon National Park. I also think it would be extremely wise to ban all use of outboard motorized craft on the river. If we don't start real conservation of our wilderness areas now it's fairly obvious that we won't have them in the future.

I certainly do not oppose rafts or other "floating" type boats on the river and I have many friends who run the rapids every summer. The main thing they tell me is that each year with the increased traffic they can notice a definite deterioration in the wilderness qualities of the area.

Please don't let a small group of people (the proboard outfitters) dictate policy on this.

Thank you for any consideration you may give this letter.

Sincerely yours,

Judy Dyke

cc: Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Grand Canyon, Arizona 86023

THE UNIVERSITY OF UTAH
SALT LAKE CITY 84112

ADMINISTRATIVE VICE PRESIDENT

November 22, 1972

Mr. Nat Reed
Assistant Secretary of the Interior
U. S. Department of the Interior
Washington, D. C. 20240

Subject: Management Policies of the Colorado through the Grand Canyon

Dear Mr. Reed:

As one of not too many persons who has ridden the Colorado through the Grand Canyon in nonmotorized rafts, I would like to protest at this time against the increased use of outboard motors in the Grand Canyon, and also against the proposed wilderness classification plan for the Grand Canyon National Park which excludes the river itself.

My personal preference is that all motorized boats not be prohibited, but that a reasonable quota of persons be allowed to enjoy this beautiful scenic trip on the commercial boats, and likewise if the use of the canyon by nonmotorized rafts increases too much, then traveling by this means should be restricted yearly. In my view the ecology of the Grand Canyon can only tolerate so many visitor days during the year, and that should be jealously guarded. If I traveled down the canyon during 1971, which I did, then perhaps I should not be entitled to again visit the canyon until my turn comes up again, maybe in five years from now.

My observation of those individuals who traveled on the commercial boats was that they had different attitudes about the reverence of the canyon than did those traveling in nonmotorized parties.

I hope that in the leadership of park management in the U. S. that you will be willing to bear in mind the feeling of many of us that reverence and an ethical value for land in its natural beauty must be preserved.

Sincerely,

Ray Varley
Administrative Vice President

cc: Mr. Merle E. Stitt
Mr. Rod Nash

FRED B. EISEMAN, JR.
13025 EAST MOUNTAIN VIEW ROAD
SCOTTSDALE, ARIZONA 85254

November 6, 1972

Mr. Merle E. Stitt
Superintendent
Grand Canyon National Park
Box 129
Grand Canyon, Arizona 86023

Dear Merle:

I submit herewith my review and comment on the Draft Environmental Statement for the proposed Wilderness Classification for Grand Canyon Complex, Arizona, as requested in your letter of October 25, 1972.

1. Page 20, Alternatives to the Proposed Action, part C., Larger Wilderness Designation, No. 2, last paragraph on page 20. This is the most important criticism of the EIS that I have to offer. It involves the Colorado River. The paragraph referred to consists of one sentence:

> "The Colorado River was excluded, due to present usage of motors on float trips."

One of the principal values of an EIS is its requirement that there be included a complete discussion of alternatives to the proposed action. In this case, alternatives to the proposed Wilderness Recommendation are obviously, no Wilderness, less Wilderness, and more Wilderness. But, dismissing the very heart of the Grand Canyon Wilderness, the Colorado River, with a single (and, I might add, illogical) sentence is hardly what could be termed a complete discussion of alternatives.

This is not the place to argue for the inclusion of the River as Wilderness.That should be (and is being) done elsewhere. This is only the place to argue that the very viable alternative of including the Colorado River in Wilderness should be considered thoroughly, its implications and effects discussed exhaustively, and specific reasons for not including it within Wilderness should be explained and justified.

In effect, what the EIS now says in the paragraph quoted above is:

> "The Colorado River cannot be included within Wilderness Classification because the Park Service has decided that it cannot be included within Wilderness Classification."

That this is circular reasoning need hardly be pointed out. It is quite true that the use of motors on boats is not proper in a wilderness area, but the alternative that should and must be considered and discussed is to eliminate motors - which would, of course, then allow the area to be classed as Wilderness. Incidentally, the wording "usage of motors on float trips" is self contradictory. If it is a motor boat trip, it is not a float trip. And if a trip is a float trip, then it is not a motor boat trip.

I therefore urge and insist that this alternative, the addition of the Colorado River to Wilderness, be considered, discussed, and its exclusion thoroughly and logically justified in the final EIS.

My other comments are not nearly so important as the above, but I shall offer them, with an eye toward improving the report.

2. Page 20, 2nd. paragraph, 1st. sentence. The statement is made that the initial acreage proposed for wilderness was increased after studying the results of public hearings. This "increase" was from a total of 505,300 acres (Wilderness Study, Preliminary, January, 1971, page 7) to a figure that is either 508,500 acres (as given on page 1. paragraph 1 of the EIS) or 512,870 acres (as shown on page 1 of the Wilderness Recommendation). For this latter conflict see comment no. 3 below.

If one believes the EIS, the "increase" after the hearings amounts to 0.6%. If one believes the Wilderness Recommendation, the increase amounts to 1.5%. The statement on page 20 of the EIS implies that the Wilderness team listened carefully to the 741 out of 790 agencies, organizations, and individuals who favored more wilderness than the NPS proposal indicated and then acted according to the wishes of this 94% majority. (For figures, see page 27 of Wilderness Recommendation. There is shown a total of 741 favoring more wilderness. I disregard those who took no stand one way or the other - more, less or no wilderness. This gives 13 supporting the NPS proposal, 13 favoring less, and 23 opposed to wilderness. Added to the 741 who favor more wilderness, this makes 790 who expressed an opinion.)

I feel that the statement about increasing the wilderness area after the hearings is totally misleading. It implies that attention was paid to the 94% who favored more wilderness, whereas, in fact, almost no attention was paid to them at all (0.6% or 1.5% increase).

3. As indicated above, there is an inconsistency in the statement on page 1 of the EIS, line 2, about the total of 508,500 acres of wilderness, and the statement on page 1 of the Wilderness Recommendation that 512,870 acres is included.

4. Page 3, paragraph 3, 2nd. sentence. The statement is made that the Master Plan contains no conflicting issues with the wilderness recommendation. Of course, the final Master Plan has not been made public as yet, and one cannot, therefore, criticize this statement. But, if the final version of the Master Plan contains many of the statements that are made on pages 29, 30, and 31 of the third draft of the Plan, dated January, 1971, then there are many conflicts, at least as the Colorado River is concerned. For example, the statement is made four times on these three pages that the river trip is a wilderness experience. This surely conflicts with the exclusion of the river from wilderness classification. There are other inconsistencies on these three pages, and they had better be examined before the above-quoted statement about no conflicts is made.

5. Page 6, 2nd. paragraph. 2nd. sentence. Except for a very few scattered exposures of Mesozoic strata, some of which are not within the Park, the rocks that contain well-documented fossils are all Paleozoic. According to "Geologic Time Chart for use at Grand Canyon National Park", GRCA-EAS-8, EA/1/5, the Paleozoic Era began 570 million years ago and ended 225 million years ago. This is a span of 345 million years, not 600 million years. Further, the strata do not by any means represent "nearly all of the periods of geologic time".

Same paragraph, last sentence. The reference to "the beginnings of time" is inappropriate and inaccurate. When did time begin? Did it have a beginning? If the author, carried away with romance, meant "beginning of the earth", then he is way off because the 4.6 billion year age of the earth can hardly compare to the 2 billion year old rocks. I also object to the use of the word "metaphorically" in this sentence.

6. Page 7, 2nd. paragraph, 1st. sentence. This is a little confusing. I presume it means that between 1960 and 1970 there were 4.8 million visitors to the Canyon and that this represents twice as many as visited the area between 1950 and 1960. If this is what it means, then why not say so?

7. Page 10, 2nd. paragraph, last three sentences. It woulbe be nice if these statements represented the true situation, but based upon extensive personal observation, they do not. The visual and audible impact of aircraft upon ground-based observers is worse than ever. They should be prohibited from flying below the rim. If the previous Park management has been resource-oriented, this situation would have been much better than it is now. Helicopters land at the junction of the Little Colorado and Colorado Rivers. Usually this is done on Navaho Reservation land, but it has been observed on the island at the mouth of the Little Colorado. They also land regularly at Lava Falls, and at Tapeats Creek, and sometimes at Whitmore. Admittedly these areas are not "in the Park", but they are only feet from the Park, and such practice is not within the spirit of the law, and nothing is being done to prevent it. If the inner canyon is made into Wilderness, then the presence of aircraft within a few hundred feet of this wilderness is surely inappropriate.

8. Page 11, 2nd. paragraph, 2nd. sentence. We had better make damn sure that the repeal mentioned will have no impact on future dams. The words "would appear" imply uncertainty.

9. Page 11, 3rd. paragraph, 2nd. sentence. Here appears the inconsistency of exclusion of the River from Wilderness classification. It is said that those who prefer motorized transportation will have to practice it elsewhere - not in the Canyon. Oh? Under the present plans, all they have to do is motor right down the middle of the "Wilderness" on a rubber baloney boat!

10. Page 12, last paragraph and page 13, 1st. paragraph. If the inner Canyon is made Wilderness and the River is not, then this action will surely affect river trips. How can a motorized boat be pulled up on the shore - which is Wilderness and in which no motors are allowed?

The "limitations" placed on the river trippers were not on the basis of individuals, but rather on user-days. They were based exclusively upon what the commercial river operators wanted, not on protection of the environment. This is an out-and-out lie.

Although the motor boat parties don't do much hiking, they do stop at several standard places - Nankoweap, South Canyon, Vasey's Paradise, Redwall Cavern, Shinumo, Deer Creek, Matkatamiba, etc. The enormous number of people who flock to these places has already had considerable effect on the area and may be expected to have an even greater effect unless positive action is taken. This paragraph evades the truth.

11. Page 14, 2nd. paragraph. It is amusing to see references to "the center of the wilderness area" and "the heart of the canyon, the Colorado River" and realize that this is specifically exempted from Wilderness classification. It would be best to eliminate this paragraph, lest you be accused of inconsistency.

12. Page 17, 2nd. to last line. "Never" is a rather positive word. On pages 54 and 55 of "Administrative Policies for Natural Areas of the National Park System" there is an admirable description of the reclaiming of damaged land into wilderness in Sequoia National Park.

13. Page 18, 1st. sentence. How about the river environment? Since you haven't studied it at all and have no data about the effect of motors and the effect of 105,000 user-days per year on it, how can you make the statement that there are no resources committed to destruction by this proposal?

14. Page 22, 1st. paragraph, 3rd. to last line. Again we have the wishy-washy statement that the authority to construct dams "appears to have been" revoked. Gad, let's make sure and then say that it definitly has or hasn't!

15. Page 22, last paragraph, 1st. sentence. Why not also make a big point of the fact that a huge majority of those consulted favored <u>more</u> wilderness and that they were ignored? Is this a face saving mechanism?

16. The following are errors of spelling, grammar, and word usage:

a. Page 4, 3rd. line. The Board of Geographic Names refers to Lees Ferry, without the apostrophe.

b. Page 5, 2nd. paragraph, 3rd. line, 1st. word. For <u>assembleges</u>, read <u>assemblages</u>.

c. Page 5, last paragraph, line 3. " One of the .... browse<u>s</u>" , not <u>browse</u>.

d. Page 7, 4th. line from bottom. "A large number of .... make<u>s</u>" not <u>make</u>.