Committee on Resources
Subcommittee on National Parks & Public Lands

Witness Statement

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Introduction

Thank you Mr. Chairman and members of the committee for inviting me to speak today on this important issue of access to our national parks. I appear before you as someone who has an academic and personal interest in the Grand Canyon. I have been hiking the canyon for twenty years and have logged over 400 days in the canyon, and over 250 nights camped in its backcountry. I have worked on both rims of the canyon--north and south--in a wide variety of jobs for the lodging concessionaires. For the last ten years I have been lucky enough to teach at the College of Business Administration at Northern Arizona University in nearby Flagstaff. I have had a chance to study the management of the canyon by the National Park Service (NPS) and offer various critiques of these practices to my students.

Their actions, some already undertaken and others planned, seem premised on distancing, discouraging and detouring visitors from the Grand Canyon. Taken together these actions are likely to lead to an erosion of public interest in this spectacular park.

Today, downriver from the Grand Canyon, the Lake Mead NRA is in the top ten most visited areas, according to the NPS, while the Grand Canyon is not in this list. Upriver from the Grand Canyon, the Glen Canyon NRA enjoys more overnight stays than the Grand Canyon, despite getting only about half as much total visitation. Certainly these outcomes are due, in part, to fewer constraints on visitor access to these other areas. And, at the Grand Canyon, these constraints are growing and becoming more restrictive.

If officials in the Park Service get their way, future visitors may barely even get to see the Grand Canyon. They will have to park seven miles away. They will have to board a train to get to the Canyon View Plaza, which is a couple of city blocks from the rim. They may decide to stay on the train and go the Heritage Center, where they can learn all about the Grand Canyon but cannot see it. They may decide to take the bus to the Yavapai Lodge and have lunch, still not seeing even a glimpse of the canyon. Having spent a couple of hours in the park without seeing anything of the canyon, they may take the train back out to Tusayan where they can watch the IMAX film on the Grand Canyon and finally ooh and aah over this spectacle. I hope that you find such a future as troubling as I do.

Today I would like to address the issue of the park's policies and how they have affected, and can be expected to continue affecting, access to this great place. First, I would like to talk about the shortcomings of the transportation plans being considered at Grand Canyon, how they will not solve problems, but, more likely, will exacerbate them. Then I would like to briefly touch on a wider variety of park actions that

further contribute to this virtual policy of limiting visitor access to the park.

Transportation Plan - 2000

The current transit plan for Grand Canyon may be summarized as follows:

A rail system will link up the park with the community of Tusayan, just outside the park boundary, some seven miles from the rim. The system will consist of a double set of tracks that go to Mather Point, the site of the new Canyon View visitor/orientation center and then to the Maswik Depot, in the Grand Canyon Village. The train will run in a continuous loop from Tusayan to Canyon View to Maswik and back to Tusayan.

Most of the parking inside the park will be eliminated. This will include the parking at Mather Point and most of the Grand Canyon Village parking.

A parking lot will be built in Tusayan. It will be designed to accommodate a little over 3,000 automobiles, as well as space for buses and RVs.

Day visitors to the park will have to board the train in Tusayan. Those staying overnight at a lodge in the park will be allowed to drive into the Maswik or Yavapai lodge areas. From there they may have to take a bellman's shuttle to get to their lodge.

The train is supposed to be running 24 hours a day, 365 days a year. At night, the proposal is to run it only once an hour, and during the very busy times in the summer, running every 10-15 minutes. Once inside the park, visitors will have to take buses to go to various points within the Village, or along the rim. It is not planned that the buses will run at night.

Highway 64 and the Desert View entrance will remain open. However, parking will not be provided at the overlooks along the East Rim/Desert View Drive except at Desert View. Access to those overlooks will be restricted to passengers in tour vehicles and shuttle buses. The tour vehicles will require a separate fee and will be operated by the organization that wins the contract for the rail service. Presumably this monopoly provision will allow the winning bidder to partially cross-subsidize the rail service with fees generated from the tour bus business.

Everyone entering the park, regardless of whether they use the transit, will be charged a transportation fee. So, visitors who are driving through the park along the East Rim Drive (say, on their way from Flagstaff to Lake Powell) will have to pay individual entrance fees that will include the transportation charge. This allows for further cross-subsidization of the rail service and will not be waived to holders of annual passes.

Park Service Rationale for the Plan

To justify this plan, officials from the Park Service have made a number of arguments. If you pick up any newspaper article you will see one, or more, of these four justifications:

This will improve the quality of your visit!

This will reduce congestion and frustration!

This will reduce noise!

This will reduce pollution!

The problem is that all of these reasons are misleading, at best, and false, at worst. Let's now consider each of these arguments in turn.

The Quality Issue--Is the Problem Intractable?

What is the "quality" problem here? Quite simply it is that the infrastructure is insufficient with regard to the demand. During the peak tourist season, there are times when the overlooks are crowded and parking is difficult to find. The simple, and most obvious, solution is to expand the infrastructure. Is that an intractable problem? I think not. To put this problem into context, consider these salient points:

- At over 1900 square miles, the Grand Canyon is a huge place--almost as big as Delaware and larger than Rhode Island.
- The developed area of the Grand Canyon Village is tiny--hardly two square miles--and this is where almost all Grand Canyon visitors go. [Interior Secretary Babbitt has suggested that we are loving the Grand Canyon to death. It is not clear what he really means by this, but perhaps he is referring to these two square miles.]
- The parking demand, at the peak of the tourist season, is estimated by the Park Service to be about 3,000 spaces.

On the face of it, we could increase the developed area in the park by 100 percent and still just be looking at four square miles in a park that is 1900 square miles. Would that so degrade the resource that it would be forever damaged? Would that be a blot on our generation, having failed to save the Grand Canyon? Would we have turned the Grand Canyon into a circus? The answer to all of these questions is, "No." Yet, time and again Park Service officials have argued that it would be some kind of heinous crime to expand the "footprint" of development at Grand Canyon.

There is even more to this story. There are lots of lands around the Grand Canyon that have limitations on their use and development. There is the Kaibab National Forest, north and south of the park. There are the Kanab and Saddle Mountain Wilderness Areas, on the east and west sides of the main part of the park. There are the Glen Canyon and Lake Mead National Recreation Areas upriver and downriver of the park. There are lands managed by the BLM, as well as Indian reservation lands. There are nearby parks, and the two National Monuments that President Clinton unilaterally established--the Escalante Grand Staircase and the Parashant. In fact, there is so much land here that one wonders why environmentalists are not totally in favor of expanding the developed Grand Canyon Village area. It would, after all, continue to funnel most people into a relatively small area and keep them out of most of these other, wilder, lands.

If you look at the profile of visitation to the South Rim, you may be quite surprised. From 1976 to 1996 the share of auto visitors has fallen, and now accounts for about seventy-five percent of the visitor base, while the bus share is about one quarter of the total. In the U.S., only 2 percent of all trips are made via mass transit. In that context, perhaps we should declare mass transit an enormous success at the Grand Canyon!

When I first started considering the Park Service's plans, I wondered what it meant to need 3,000 spaces. Is

it a lot? Well, I didn't know. All I can really visualize is four, which is what I can accommodate in my garage and on the pad in front of it. However, with the South Rim getting about 4 million visitors a year, the need for 3,000 spaces, at least at face value, does not seem like a lot. Still, I called around where I work, at Northern Arizona University, and found that we have some 9,003 parking spaces spread across the Flagstaff campus. I probably do not need to note that our campus is not nearly as large as the Grand Canyon, nor do we get as many visitors. So, that is what we are faced with here. Is it going to be impossible to provide this level of parking somewhere near the rim, in a manner that is aesthetically pleasing? Of course not. It certainly is possible to plan and design an ugly and unpleasant parking lot, but it doesn't have to be that way.

A further question to ponder with regard to this point is whether visitors will be able to easily use the transit system. This seems unlikely. Most visitors to the Grand Canyon are first-time/one-time only visitors. They probably will not think that they need to read up on some sort of "owner's manual" when visiting the park. Confusion could become epidemic with the rail system. And, what if the system fails, or breaks down? In April of 1998 the transit system at the Denver International Airport shut down for three hours, affecting some 3,000 passengers. Where many visitors drive up to the Grand Canyon for just the day, any similar problem would likely mean that they don't get to see the canyon. The Park Service has never assessed these problems nor this risk.

Will Congestion Be Reduced?

Let us think about how this rail system will work:

> Visitors arrive in big groups on the train, every 10-15 minutes. In the summer, this would be up to 350 people. Being part of a mob of a few hundred individuals deposited on a railway platform would provide less silence and solitude than most visitors can enjoy today.
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> The park has placed a limit of 2 cars per train, so as to keep the frequency of service high. During peak conditions, this may resemble commuting to work in a large city during rush hour and is unlikely to improve the quality of the visitor's experience. According to Park Service officials, there will be excess demand for this system during the peak of summer demand. In other words, where congestion occurs now, it will continue to do so with this proposal!
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> Congestion will still occur. The automobile component will just move outside the park. There is absolutely no validity to the contention that moving congestion outside the park is equivalent to its elimination. Trying to find parking and listening to idling buses will still be a part of many visitor's experience. All this plan does is add more congestion to the experience--riding trains and buses to get from one place to another.

Will the Rail System Reduce Frustration?

Of course riding the train will not be an exercise in frustration for everyone. Some people will certainly find using the train enjoyable, quick and convenient. If you get there at the right time, under the right circumstances, this may well be the case. But, it will not always be the case. The addition of the train also adds in a host of inconveniences, with some associated increase in frustration as well. Under less than ideal circumstances, how might the train make for more, not less, frustration? Here are some issues, none of which I have seen the Park Service address:

Waiting for trains/buses in inclement weather, especially since it must be used all year long.

Waiting for the "next" train/bus because capacity is insufficient to meet demand.

Paying for taxis during the off-peak times. If one takes a day hike down the South Kaibab Trail and gets out late in the evening, there will not be a bus. I have heard Park Service officials suggest that these people will be able to get a taxi back to Tusayan for $40-$50.

Keeping large groups together. If a tour bus with a group of 25 visitors arrives, will the group leader be forced to use a megaphone to alert his/her group as to what train to board, when to board and so on? Is that going to bother other visitors?

Getting strollers/bikes/etc. on the train and bus. I have heard it suggested that some special trains will accommodate this, but that means additional waiting. It is not clear whether visitors will be able to bring their pets on the trains and/or buses.

Visitors carrying items. Many visitors carry lots of camera equipment, backpacks and coolers; and many may want to buy items while visiting. I can't imagine that hauling around all of this will be very convenient, and wonder if the Park Service will provide storage lockers at the Canyon View Plaza. Such is not currently in the plan.

Will the Rail System Reduce Noise?

The answer to this question is, quite simply, "No." The Park Service actually adopted a plan to build a parking lot at Canyon View to accommodate some 1200 vehicles. This parking was designed to eliminate any noise problem (which is both overstated and unproved). Putting the parking seven miles further away does not have any effect. In fact, the noise of the train is likely to be much greater than the vehicles we drive today and, at least at the Canyon View Plaza, it might be worse as a consequence. The Park Service has not addressed this issue even though, as I understand it, the use of diesel trains has not yet been ruled out.

Will the Rail System Reduce Pollution?

What of pollution? In 1996, the Grand Canyon Visibility Transport Commission issued a report after exhaustive study of haze at the Grand Canyon. They could not detect any measurable pollution from local automobiles. In fact, the report noted that currently manufactured automobiles only generate about ten percent as much pollution as cars made thirty years ago. The clear implication here is that, while the number of cars at the Grand Canyon has been rising over the last 30 years, the total amount of pollution generated by this traffic is actually falling! And, if this pollution is not measurable, nor noticeable, it cannot be a real problem. Yet, Park Service personnel continue to perpetuate this myth that pollution will be reduced by adding the train. It will not.

The Economic Approach

From an economic perspective, the goal of public policy should be to maximize our well-being. So, any public decision should be subject to a legitimate benefit/cost analysis. At one level this is easy--just list the benefits and costs. Economists usually take some heat from the next step in this process, which is to quantify, in dollars, all of these benefits and costs. Conceptually, it is not an unreasonable step to take. But,

the practical difficulties can be enormous. Truly coming up with dollars for all the benefits and costs is probably as much an art as it is a science. Still, the idea is sound. If the resulting benefits exceed the costs, then the decision is worthwhile. If the costs exceed the benefits, then the decision is not worthwhile. While the Park Service has not conducted such an analysis, we can sketch out an overview of the costs and benefits to this plan.

The Costs of the Plan

In August 1999, the National Park Service issued a Request for Qualifications (RFQ) for firms interested in providing these transportation services. The RFQ indicates that these costs are now expected to be about $200 million. It should be noted that these are only the capital costs of the system and do not include operating costs.

But, beyond these costs, we still face a hidden cost. This is what economists call the "full cost" of travel. For example, when you go to see a lawyer, or an insurance agent, or a barber, the "full cost" of the service that you are getting is the money you spend and the time you spend. Yet, none of the Park Service reports have attempted even to do a superficial accounting of the full cost of using the proposed transit system. Indeed, many seem to actually take some kind of pride in proclaiming that they haven't considered these costs. A couple of years ago, as part of a back-of-the-envelope exercise, I suggested that these costs may be on the order of an additional $200 million over the proposed 15 year life of the GMP. Just because the Park Service doesn't have to pay these costs doesn't mean that they are irrelevant to their decision.

How does all this translate into a per person charge? And, can we have any confidence in these numbers? The working assumption seems to be that each person entering the park will pay a $10 entrance fee. This hypothetical $10 fee represents the lowest possible price tag to visitors, and that only under the most favorable of circumstances. To even contemplate such a low fee virtually everyone who enters the park must be charged. In the adopted GMP, mass transit was to be used only for overflow visitors during the peak summer visitation months. If those are the only visitors that the train is intended to carry, it will run a huge deficit and either will not be built, or will have to be heavily subsidized by the National Park Service. So, to reduce the subsidy, everyone has to get on board. However, over the course of the year, certainly 95 percent of the time there is no justification, on the basis of congestion, for requiring people to use the train instead of their cars.

Might these costs be higher? The answer is clearly "Yes," and there are at least three reasons why. First, the Park Service assumes that the train will cost about $95 to operate, per vehicle hour. Yet they cite a nationwide average hourly cost of some $150. It is not at all clear why the costs of operating such a system would be lower at the Grand Canyon. Having lived and worked at the park on five separate occasions, I have a very strong sense that the cost of everything there is higher than average, not lower. You have probably already heard about the $400,000 homes that were built by the Park Service a few years ago at the Grand Canyon. That doesn't bode well for the idea of low costs.

Second, consider that unions can be powerful organizations, and that transit systems make a great many people dependent on a few transit workers. The threatened strike by New York City transit workers last December was a major news story. With the threat of disruption, a transportation union is likely to do quite well at the Grand Canyon. What happens if the Park Service and/or the railroad company has a standoff with these workers, and they go on strike? It means that you will not be able to see the Grand Canyon. This potential has been totally ignored in the Park Service reports to date.

Third, the Park Service projects that the number of visitors will reach some 6.3 million at the South Rim by the year 2010. Certainly, this must factor into their calculation of the cost per visitor. And, what if these projections fall short? Note that from 1988 to 1998 visitation grew by an average of 1.7 percent per year. If that rate were to hold until 2010, then visitation would rise to only 5.6 million. If the Park Service is counting on 6.3 million people to pay $10 each to pay for the train, and only gets 5.6 million, who will pay for the rest? This kind of uncertainty makes this kind of large investment reckless. In fact, the RFQ indicates that the winning bidder will get a 20 year contract, but will be "required to provide financial contingency plans for unexpectedly large down-turns in annual visitation."

The Benefits of the Plan

What exactly are the benefits that we gain from this plan? We have dispensed with the claim that there are benefits with regard to the quality of the visitor experience, reduced congestion and frustration and improvements in the noise and air quality. In the end, the benefits really boil down to the addition of about 1700 more parking spaces. That is, about 1300 parking spaces in the Village area and at Mather Point will be removed, while about 3,000 spaces will be built in Tusayan. At $200 million to build this rail/bus system, that works out to about $118,000 per additional parking space of capacity! And that, of course, ignores the "full cost" earlier described. It is worth noting that the parking must be made available somewhere. That is not the issue. If it is close to the rim, then there is no need for such a monstrous transit system, and these enormous costs. If you push this parking further away, then the complexity and cost grow. There are some in the Park Service that argue for the parking to be pushed even further away, to the crossroads called Valle, some thirty miles from the park.

How Did We Get to this Plan?

We started down this road in the early 1990s. Developing the General Management Plan for the Grand Canyon was a fairly long process, involving a number of public meetings at different stages along the way. A draft version of the GMP, released in 1993, included an option that would have visitors stop outside the park boundary. This option was rejected and, in the final GMP adopted (1995), the Park Service planned to build a parking lot at the Canyon View Plaza that would accommodate about 1200 autos.

In March of 1997 an Environmental Assessment (EA) was released, involving the Canyon View orientation center, including transportation into the park. The time frame allowed for the public to make comments was 30 days from the issue date of the EA. This plan had an alternative to build a parking lot at the center, but the Park Service's now wanted to put all the parking out in Tusayan. So, while this alternative had been rejected a couple of years earlier, it was now the preferred course of action, and was adopted. At the time, the estimated cost of this system would be about $100 million, which we have learned was only half right. To the best of my knowledge, there was not a single public forum held to explain and defend this proposed course of action.

What Is to Be Done?

There is congestion at the Grand Canyon. This has led to a great deal of visitor frustration and certainly has an adverse impact on the quality of their visits. I would offer these two possible solutions to this problem:

A Small Proposal. Develop the Canyon View Plaza parking lot as originally planned. Leave the Village parking intact. I suspect that many visitors will not want to drive on into the Village, but would rather take a shuttle bus. Improve the shuttle system so that it is easy, and convenient, for these visitors to leave their cars

at the Canyon View Plaza and visit the Village and other points along the rim. But, keep this voluntary. Improve some of the road infrastructure to assist in this. Based on data supplied in the Draft GMP in 1993 (so, now hopelessly out of date), I calculated this cost at between $8 million and $10 million.

A Big Proposal. Ultimately, the problem illustrated by the transportation plan is that officials of the National Park Service have no expertise in urban planning. They are, as to be expected, more likely to have technical skills that are better suited to managing the Grand Canyon's natural resource. Their attempt to manage visitors is more than likely to be an absolute failure. So, my big proposal is to remove the Grand Canyon Village and nearby developed areas from the national park. These areas are located on the rim, and the rim is not the Canyon. There is no rationale that can be used to support the notion that these areas need to be managed by the NPS. All together, this would amount to between six and eight square miles. If some find that the loss of any park land too great a price to pay to restore sanity to the Village, then we could probably add in some equivalent amount somewhere else. Getting the Park Service out of the urban planning business is both a short-run as well as a long-run solution to the problems encountered at the Canyon. The area will not degenerate into a free-for-all, with unconstrained development. Coconino County will regulate this area, set zoning standards for this area, debate development in this area, just as it does for any other non-incorporated area.

Other Grand Canyon Management Issues Affecting Visitor Access.

I. The General Management Plan (GMP). In 1995, the Department of Interior approved the General Management Plan for the Grand Canyon. Even a casual study of this document illustrates the degree to which officials within the Park Service are promoting an unwritten policy of discouraging visitor use and enjoyment of the Grand Canyon. Consider some of the actions that are being pursued as part of the GMP:

> *Tear down the Kachina and Thunderbird lodges*. These lodges are located on the rim of the canyon, enjoy occupancies in excess of 90% and are among the best examples of architecturally-friendly and environmentally sustainable designs within the park. However, park officials seem to feel that it is inappropriate for visitors to be able to enjoy such close proximity to the canyon and would prefer to locate lodging seven miles south of the rim.
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> *Development of the "Heritage Center"* to educate visitors about the Grand Canyon. This facility is not located on the canyon rim, and you cannot see the Grand Canyon from this site. This center will replace, among other structures, the existing mule barn, said to be the oldest, continuously operated, commercial facility of this type in the U.S. It raises the question of why officials in the Park Service are concerned about preserving the physical symbols of our culture, but not the use to which they were put. [As a related example, some years ago the Park Service took over the Kolb Studios, which had been a private photography business on the rim of the canyon, and converted it into a bookstore who's proceeds, in part, flow back to the park.]
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> *The building of the Canyon View Plaza* as the first point of contact with visitors. The name may well be an oxymoron, as I don't believe that one can really see the canyon from this facility. To see the canyon, one will need to walk along a path to the rim. Contrast this distancing of the visitor with the Grand Canyon Lodge, on the North Rim, and the Bright Angel and El Tovar lodges, on the South Rim. Visitors appear to enjoy the comforts of these facilities while also taking in the spectacle that is the Grand Canyon.

The actions of officials in the Park Service and the Interior Department belie any interest in improving the

visitor experience at Grand Canyon, and certainly not in accommodating more visitors to this great natural spectacle. Instead, they treat visitors as needing an education, as requiring proper preparation and as being unworthy of simply enjoying the Grand Canyon in their own individual fashion.

II. Backcountry and Wilderness area management. Recent Park Service actions, with regard to pricing, do appear to have had a significant effect on backcountry visitor access to the park. Fees for river runners have changed, and the park began to charge backpackers for overnight permits in 1997. According to the statistical abstracts posted by the NPS (Table 6) on their Public Use Statistics Office web site, backcountry overnight stays at Grand Canyon over the last four years have declined dramatically:

Year:	**1996**	**1997**	**1998**	**1999**
Backcountry overnight stays:	**265,000**	**246,000**	**153,000**	**154,000**

The main culprit here would appear to be these pricing changes. However, data collection at the Grand Canyon is so dreadful that further investigation would be necessary to ascertain the reasons for this decline.

Wilderness proposals made by the park continue to discourage visitors, especially to more remote parts of the canyon. For example:

> A fifteen mile road along the canyon rim from Desert View to a place called Cape Solitude is now designated as proposed wilderness--only hikers are allowed. This road is entirely above the rim, is totally waterless and brutally hot during the summer. As such it would make an ideal mountain biking route. But, bike riders have been caught using this road and threatened with arrest and fines. I would be surprised if even a single hiking permit has been issued for this area in the last four years.
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> To the west of the Grand Canyon Village, the park has closed access to the so-called Boundary Road. This has exacerbated access to points west of the village, yet this road is literally next to the fence that forms the boundary between the park and the Kaibab National Forest. Following Forest Service roads to western parts of the park, like the Bass Trail, is made more difficult as they pass through portions of the Havasupai Reservation, where there are a number of Native Americans that have blocked these roads to keep visitors out, with or without approval of the tribal government.
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> I have often heard park officials say that they are engaged in these activities in order to "preserve" the resource for future generations. Such a claim is absolutely preposterous. The notion implies that future generations will be allowed access to these areas even though we do not have this access today. If so, then why are we being restricted? It is much more likely that the Park Service wants to permanently restrict visitor access to these areas, which, as a matter of public policy, is untenable.

III. Attitude adjustments.

For years, local businesspeople have complained about the bad press that flows from officials in the Park Service about how awful conditions are at the Grand Canyon. The claim is that this continuous denigration of the park's image has had a negative impact on visitation, and the evidence of the last ten years would tend to support this notion.

This attitude permeates deep down into the Park Service. For example, on their web page for backcountry

hiking FAQs, to the question, "Should I hike alone?" there is a five sentence response, which includes these two: "Mountain lions do inhabit the Grand Canyon. Hikers traveling alone are at greater risk of attack." In the twenty years I have been hiking the canyon, I have yet to see a mountain lion. I do most of my hiking off-trail, away from populated places and on the north side of the canyon, where mountain lions would be most likely found. I have not heard of anyone seeing a mountain lion at the canyon, and never have I heard of a hiker being attacked by one. The purpose behind such a statement seems clearly to be one of intimidating potential hikers.

Officials at the Park Service are rather skilled at 'having their cake and eating it too'. They argue that commercial overflights be restricted because they are noisy. And, they protest against the noise made by commercial boaters, claiming that it intrudes on others' enjoyment of the natural quiet of the canyon. If noise really is the issue, then shouldn't the Park Service be held to the same standard? One would think so, but, apparently their noise is not interfering with the visitor's enjoyment of natural quite, while noise generated by commercially-operated activities does.

Yet, the noisiest experiences I have had in the Grand Canyon have come from Park Service activities. Just last year a Park Service helicopter flew over me while I was hiking the South Kaibab trail. It seemed barely a couple of hundred feet away, although I cannot judge such distances accurately. It flew down past me and away. I have never seen a commercial helicopter do that.

And, the worst encounter I have had with noise from boats was near the Little Colorado River. A Park Service research party had motorized rowboats that they used to go up and down the river. I spent the whole day hiking along the river and was constantly seeing and hearing these boats. Their stand on the noise issue is distinctly hypocritical. As an aside, I suspect that the value of such research probably wouldn't stand very close scrutiny--probably 99% of it is just an excuse to freely raft the Colorado River, or even get paid for doing so. It is a terrible way to allocate such a valuable resource.

Conclusion

The National Park Service has been pursuing, and continues to pursue, an unwritten policy of distancing, discouraging and detouring visitors from the Grand Canyon. They are failing to seriously adhere to their mission of providing visitors access to, and enjoyment of, this national treasure. We face the real possibility that these actions will actually degrade and worsen the visitor experience. The best solution, as well as the most easily administered, may well be to remove the developed areas of the South Rim from the control of the National Park Service.

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