

Mule Operations and Stock Use Public Scoping Comments

The National Environmental Policy Act (NEPA) of 1969, as amended, calls on federal agencies to consider environmental issues as part of their decision making process and to involve interested parties in the process.

Grand Canyon National Park staff reviewed the letters, comments, and e-mails received during the project's initial public scoping period, May 22-June 22, 2009. The following are comments taken from individual correspondence will be considered in preparation of the Environmental Assessment.

Comment
NPS should evaluate whether the MULES and TRAILS are cultural resources/landscapes worthy of historic designation & preservation.
Mule barn and blacksmith shop need to be preserved in an intact state to preserve their historic character.
Mules grind the pathways to talcum powder, which in turn encourages erosion, needing constant and expensive attention.
Due to mule use, National Park maintenance crews must create steps on paths that would normally have a smooth surface. This is harder for hikers to walk on.
The fine material required for mules rapidly erodes away and must constantly be replaced, a never-ending process.
Consider allowing concessions to provide mule rides on the S. Rim both East and West of the village. Specific destinations mentioned by some include Yaki Point and Skeleton Point.
Mule rides provide many jobs for people in this area.
Mules are necessary to service Phantom Ranch.
Mules enable those who would otherwise be unable to experience the inner canyon to do so.
Stock use provides for hiker safety by enabling rescue of injured hikers.
Mule use leads to safety issues for hikers. These include the risk of passing on narrow trails and the health hazard of breathing excrement-contaminated dust.
Stock use on the Bright Angel Trail is more dangerous & expensive (for the concessioner) than such use on the S. Kaibab Trail.
Stock use should be reduced to minimize conflicts with other users.
Mule train leaders are too loud when talking to their groups.
Do not offer rim rides.
Mules eat trailside vegetation, causing unacceptable impacts.
Consider manure bags or rotating use of trails by mules to reduce offensive odors from mule urine and droppings.
Remove stock droppings to reduce associated impacts and odors. Alternatively, regularly sprinkle soil or some other additive to soak up urine & droppings or help them decompose faster.
Consider moving the mule corral away from the trail to reduce offensive odors. One commenter specifically suggested Yaki Point as a good place for it; another, the area beyond the backcountry office.

Consider opening more trails as a way to disperse mule use & reduce impacts (or, the reverse: closing one of the corridor trails would concentrate stock use on the other, increasing impacts). One possibility is the Abyss Trail on the S. Rim. Rim-to-rim rides would also be nice.

Allow mules to use roads with a painted safety path.

Open the bright angel trail to hikers on the north rim.

Create more areas where mule trains can stop to relieve themselves so that impacts can be more dispersed. Being creatures of habit, mules will regularly urinate in preferred places, which should make cleaning such areas simpler.

Create "passing lanes" for hikers & stock to safely pass each other (one commenter mentioned specifically the N. Kaibab Trail).

Consider penalties for those who do not pass each other according to the permit instructions, as a way of improving safety. One penalty could be revocation of permit or being barred from one in the future.

Consider hardening trails open to stock use to minimize impacts, such as through cobbling or asphalt.

When rebuilding the S. Kaibab Tr., use 7" or smaller steps for hiker comfort & safety.

Restrict hiker numbers to reduce impacts.

Consider increasing fees to cover costs of maintenance. While most applied this suggestion to stock users, at least one commenter suggested hikers be charged a maintenance fee.

Use mules to ferry river runners out of canyon instead of helicopters. Also, make this an affordable service -remove the 5-mule minimum requirement.

Use helicopters to supply Phantom Ranch, not mules (eliminate mule use).

Use mules to service Phantom Ranch, not helicopters.

Use temporal zoning to minimize safety concerns of groups passing each other on narrow trails.

Consider spatial zoning to segregate users (one trail for horses only, another for hikers only). Another idea: make the S. Kaibab/BA trails one-day.

Restrict all N. Rim stock use to rim trails; consider building a new rim trail for this purpose. Or, restrict mule rides to the area above Supai Tunnel.

Close some trails in winter (Oct.-April) to minimize stock damage.

Discontinue overnight mule rides. Related suggestion: increase # of cabins at Phantom Ranch for hikers/put mule riders in the gender-restricted dorms.

Put mules no longer needed up for adoption or send them to grassy pastures.

Consider employing a person to look after mule welfare (exclusively/non-partisan).

Implement a permit system for concessioner & private mules/Limit mule use to 20 per day on trails open to them/make any restrictions fair to both major parties.

Consider allowing llamas in the canyon; they incur fewer impacts than horses or mules.

Consider working with volunteer groups such as Backcountry Horsemen of America to accomplish trail maintenance.

Consider making Xanterra responsible in part or completely for trail maintenance.

Encourage Xanterra to develop incentives for retaining quality guides.

Educate users as to what to expect on their hike or stock trip. similarly, screen mule riders to restrict the rides to those who have enough experience to stay in the saddle (avoid being thrown).

Monitor impacts of both visitor groups (stock and hiker).

NPS should consider effects of stock use on archeological resources.

Please include a description of current use and a map of trails open to stock and hiker use.

"Sustainable" needs to be clearly defined.

The EA needs to examine the financial impacts of stock use (commenter pointed particularly to concessioner stock use). Another commenter noted that mules are exclusive to the rich because they are expensive.
The long history of horse/mule domestication and their use in GRCA obviates the need for this EA.
Doing an EA when all visitor use is concentrated on Bright Angel Trail may predispose some members of the public against stock use.
Mule use in GRCA is unethical; mules are overloaded & overworked. They are not exercised in winter, have no shelter from harsh weather, and must stand in their own waste.
Stock use may increase nest parasitism of the SW Willow Flycatcher; NPS should analyze this possibility. NPS should also analyze whether any new uses impact T & E species.
Consider whether any move of the stock corral fits within previous USFWS consultations.
Mule use should be retained as a way to experience the canyon and preserve an important component of the park's history.
Please keep the Bright Angel Trail (specifically) open to mule use, in order to provide viewing opportunities of mule trains and because this trail is not as steep as the S. Kaibab.
Retain stock use all the way to the river. Some request that mule rides from N. Rim go all the way to Phantom Ranch and/or that full day rides be reinstated from N. Rim.
The S. Kaibab Trail should remain open to stock use. Others specifically mentioned include the Uncle Jim and Whitmore Trails.
Doubling stock use of one corridor trail by closing the other to mules will increase conflicts between hikers & mules.
NPS should retain the ability to bring and use private stock in the park.
Mule use should be eliminated from one or both trails to preserve natural resources. Most commonly, commenters suggest the Bright Angel Trail be closed. Others mention the Uncle Jim Trail, and at least one suggested making the S. Kaibab Trail hiker only. Another suggested restricting stock to an unspecified trail west of the two main corridor trails.
EA should disclose effects of stock use on natural resources, including water quality and vegetation.
Do not allow private stock use.
Day trips by horses to Plateau Point should be terminated.
Mule droppings and urine made hiking the trail offensive or unpleasant.
Mule use should be eliminated from one or both trails to enhance the hiker's experience. Alternatively, one or more trails (suggestions included the Ken Patrick trail, the Bright Angel Trail, and the S. Kaibab Trail) should be restricted to hiker use. Still another related idea: limit overall stock user numbers.
Both trails should remain open to hikers/neither trail should become mule-use only.
Helicopter noise distracts from the wilderness experience.
Consider whether stock use contributes to sediment and selenium loading in streams & Colorado River.
Mule droppings contaminate water supplies; they may also contain harmful trace chemicals that affect natural environment.