

Reasons for opposing a Beach Habitat Building Flood (BHBF) in 2007. Mark Steffen, Northern Arizona Flycasters/ Federation of Flyfishers. 12-01-06

-Angler observations indicate that the November 2004 flood caused severe damage to the aquatic plants and aquatic insects that provide the food supply for Rainbow Trout at Lees Ferry. AGF data from the April 1996 flood also indicated a drastic reduction in the aquatic food supply (diatomaceous algae) for fresh water shrimp.

-AGF data indicates that the Lees Ferry Trout population has declined from about 100,000 Trout before the 2004 flood to currently less than 50,000. The GCDAMP strategic plan specifies a goal of 100,000 Trout at Lees Ferry.

-At a 2006 TWG meeting, AGF expressed a desire to stock some trout to achieve AMP goals for Lees Ferry. AGF was subsequently harassed, obstructed and threatened with law suits to prevent stocking of trout at Lees Ferry.

-Until the Trout population at Lees Ferry returns to the level specified in the AMP strategic plan, either through natural reproduction or by AGF stocking, FFF/NAF will not support experiments that will be likely to have a detrimental affect on the Lees Ferry Trout fishery, especially not BHBFs!

-The economy of the Marble Canyon and Lees Ferry area suffered tremendously from a drastic reduction in anglers following the 2004 flood. News reports of another flood would further reduce the numbers of anglers willing to travel to fish at Lees Ferry.

-Stronger than normal 2006 monsoon rains produced heavy and frequent Little Colorado River flooding in summer and fall. It is likely that large numbers of juvenile Humpback Chubs were flushed into the Colorado River. Will a 2007 flood send large numbers of young HBC to Lake Mead?

- AMWG stakeholders support BHBFs as a PART of a Long Term Experimental Plan. A BHBF is not appropriate except as a part of the LTEP! Stocking Trout at Lees Ferry when needed should also be part of the LTEP.

-Independent scientific reviews have been critical of the GCDAMP for a failure to integrate the sediment program with the biology program. Floods are not a panacea that will help all resources! In spite of budgeting 500,000.00 a year for the next several years to research Aquatic Food Base monitoring techniques, GCMRC has no AFB monitoring program and will not have one for at least several years! Unfortunately the TWG recently voted down a very inexpensive Lees Ferry AFB monitoring project proposed by GCMRC!

- Shortly after the November 2004 BHBF experiment the Paria river produced sediment adequate for another BHBF. GCMRC has expressed surprise that those sediment inputs remained adequate for a BHBF, even as recently as the August 2006 TWG meeting! GCMRC also has learned they were wrong to do the flood in 2004 shortly after sediment inputs and that sediment should be spread out before a flood.

- At the November 2006 TWG meeting, Scott Wright from GCMRC suggested that if there is no 2007 flood, GCMRC could monitor the October 2006 Paria river sediment inputs and learn a lot about how they spread out and how long they would remain available for a BHBF.

-Has a NEED for a flood truly been established? GCMRC has not given the AMWG photos or an inventory of beaches that NEED to be bigger. Are there photos of specific chub habitats that will be improved by a flood?

I'm writing you today to ask you to please NOT conduct an artificial flood. 12-03-2006

In my 24 years experience on this river I have witnessed flows from 500-cfs to 100,000 cfs and can assure you that flood flows have a negative affect on the local aquatic ecology and economy. The last flood occurred in 2004 and the river is just now beginning to recover to pre-flood conditions. If another flood were to occur at a time when the river is just starting to recover, it could spell disaster to recreational sport fishing and the local economy that fishing supports.

As you drive to Lees Ferry it is evident that you are passing through the most economically depressed region in the United States (US Census Data). The local economy in the Lees Ferry-Marble Canyon area is strongly dependent on the millions of dollars that fishermen spend here. While travelers and river-runners might visit our area for an evening (most river companies transport their guests in the day of departure), a fisherman's average stay is 3 nights at one of the local lodges. The fisherman's money stays in the local economy, supports many local Native Americans and their extended families, and creates numerous jobs in the local area.

Trout populations at Lees Ferry and in Marble Canyon have declined by as much as 50% since the 2004 flood (AGF data). The Marble Canyon area economy has suffered from a drastic reduction in Lees Ferry fishermen. I have heard recent claims the current scud population is "normal and healthy." This year my guides and I will spend 950 combined days on the river (down from >2000 guide days in 2001). Every day that we are out on the river we are searching (under rocks in algae etc.) to see what food is available. Prior to the flood it was not uncommon to see countless scuds emerge from disturbing a couple of rocks. I have seen fewer than 20 scuds (total) since the flood of 2004! Someone's data is way-off-base, and I assure you it is not mine. Prior to the 2004 flood the river was teeming with aquatic food. The 2004 flood devastated the food base for fish, and in my opinion and the opinion of many others, it is just now beginning to recover.

It is my understanding that the major driving force for floods is to enhance recreational opportunities for river-runners and provide pristine beaches for camping. I assure you that people are not going to be canceling their scheduled river trip because there are no new pretty beaches to sleep on. I do guarantee you that fishermen will be canceling their fishing trips to Lees Ferry IF a flood is conducted. News reports of another flood will result in even fewer anglers traveling to fish Lees Ferry and again, will seriously hurt the Marble Canyon economy. February through June is a very popular time to fish Lees Ferry and when most of the revenues for the entire year is generated for local businesses.

I spend quite a lot of time traveling around the country promoting the Lees Ferry fishery and my business. The past couple of years, half of the people I speak to ask me, "Are they planning another flush?", "I understand that the last flood wiped out the fish and food", "has the river recovered from the last flush?", "Will they ever stop experimenting on this river and allow the fishery to recover?", "I used to come up and catch 50 fish a day before they ruined it, I don't come anymore", "the last time I was there we hardly caught any fish." These are the comments that I hear and this is the public perception. This negative perception translates into lost revenues and recreational opportunities. Is it fair to trade one recreational opportunity (beaches) that is not going to be economically impacted, for another (fishing) that could suffer ruin?

Terry Gunn, Owner, Lees Ferry Anglers & Cliff Dwellers Lodge

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**Subject** Letter concerning flood  
**Sent Date** 12-04-2006 12:17:54 AM  
**From** LEESFERRY@aol.com  
**To** steffenvlyrod@lycos.com

Mark:

Hurredly scratched out a few thoughts on this flood thing. Hope it is in time. Dave

I am writing this letter to ask that Lees Ferry not be subjected to another BHBF.

To be honest I hold little hope that the input of the guiding community at Lees Ferry will have any real influence on the decision of whether or not to implement this flood. 2007 will be my 20th year guiding this stretch of river and I have seen and survived all the science and experimental flows from the Glen Canyon Environmental Studies on. Our voiced opposition to various flow regimes has repeatedly been ignored. Experimental flow regimes have repeatedly devastated the river above Lees Ferry from the constant 5,000 of the late 1980's that resulted in the destruction of the food base and exacerbated nematode infestations in Lees Ferry trout to the scouring of the 40,000 cfs floods and flows to reduce spawning success in the last few years. In each case the river has bounced back to some degree. However the last flood in November 2004 resulted in a %50 decrease in the trout population (according to AGF) and we did not see a rebound in the vegetation until March 2006.

In addition, the associated publicity over the years about floods, trout irradiations etc. has just about destroyed the angling based businesses at Lees Ferry. I am quite aware that this is a changing and dynamic fishery and that it is not the trout fishery it was in the 70's nor will it ever be again. It is however, a very valuable recreational resource that can provide a reasonable angling experience in unparalleled beauty. Regardless of the condition of the fishery from month to month, it is the angling public's perception of this river as a playground for madcap science that is even worse in some regards as the actual damage that some of these flow regimes inflict. Worse because I don't even get a chance, against all odds, to pull a decent day of fishing out for a client. In the 2006 season we ran just about 400 trips. This is down from 750 in 2001. There are now less than half the guides at Lees Ferry that there were in 2001. My families business at Marble Canyon Lodge has, in the past few years, closed the restaurant for four months of the year. GCMRC, TWG, AMWG and the entire program has been incredibly irresponsible in their approach to publicity surrounding the various programs and experiments. For instance, I have yet to see a press release concerning the trout irradiations that addresses the Lees Ferry fishery and the fact the the program has no bearing on the population 60 miles upstream. But this is all water under the bridge. The damage has already done. Again and again.

What is the point of these floods? From what I gather there is no biological reason for the movement of sand and the building of short lived beaches. Is it simply to operate the dam for a brief period outside of the operating regimes that make money? These floods are in no way approximating predam flows and produce no effects approximating pre-dam conditions. It just strikes me as some sort of weird irrelevant action taken to show the various agencies and the environmentally active public that the AMP is alive and well and managing adaptively. Which in my view it is not, otherwise the health of the Lees Ferry fishery and the businesses associated with it would be taken into account.

Dave Foster  
Marble Canyon Outfitters

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