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United States Department of the Interior

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MEMORANDUM

To: Secretary

Through: Bennett W. Raley /s/ R. Thomas Weimer OCT 12 2004
Assistant Secretary – Water and Science

From: Michael R. Gabaldon /s/ MICHAEL R. GABALDON
Secretary's Designee and Chairman, SEP 17 2004
Glen Canyon Adaptive Management Program

Subject: Report and Recommendations from the Glen Canyon Dam Adaptive Management Program Federal Advisory Committee

The Glen Canyon Dam Adaptive Management Work Group (AMWG) met on August 9–11, 2004, to discuss actions taken to meet responsibilities under the Federal Advisory Committee Act (FACA), the Grand Canyon Protection Act, and the Glen Canyon Dam Environmental Impact Statement Record of Decision. As your designee and chairman of the AMWG, and in accordance with the group's charter under the FACA, the following recommendations are hereby formally transmitted:

Glen Canyon Dam Operations for Water Year (WY) 2005

Recommend the replication of WY 2004 flows with mechanical removal of trout in WY 2005, with consultation, a supplemental environmental assessment, and public outreach by the Public Outreach Ad Hoc Group.

Passed by consensus.

This recommendation is for continued testing of removing non-native fish (primarily rainbow and brown trout) from the Colorado River in the Grand Canyon near the confluence with the Little Colorado River. The intent of this action is to benefit the endangered humpback chub by reducing competition and predation by non-native fish. There are some initial indications that the humpback chub are benefiting from this action, but due to the 4-year recruitment timeframe, another 2 years will be required to determine the effectiveness of this action.

Recommend the replication of WY 2004 with fluctuating flows (from 5,000 to 20,000 cfs) that continue adaptively (as needed for non-native control) through April.

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Passed by consensus.

This recommendation is intended to work in concert with the above recommendation to reduce the competition and predation by trout on humpback chub. Fluctuating dam releases are hypothesized to limit the amount of trout spawning and recruitment that occurs downstream of the dam. Implementing these releases during the months in which most trout spawning occurs will reduce the impact on recreational users and enhance the amount and value of power generation from the dam.

Recommend that a Beach/Habitat-Building Flow (BHBF) not be conducted in 2005.

Motion passed; 13 voted yes, 6 voted no, 1 abstained.

Because this motion contained dissenting votes, attached is a minority report (attachment 1) submitted by those members who voted against the motion. This recommendation conflicts with the AMWG recommendation that led to the WY 2003–2004 experiment and EA, which allowed for high flow tests when Paria River sediment inputs occurred, even if the triggering events did not occur for several years. Since these sediment inputs and the high flow tests did not occur during WY 2003–2004, WY 2005 dam operations were expected to accommodate such a test if Paria River inputs occurred. In making this recommendation, the 13 AMWG members that voted for the motion indicated to me that they were primarily concerned about the public perception of an experimental high flow release that involved bypassing the powerplant during drought conditions and potential impacts to the Basin Fund. As your designee, I must note that nothing in the BHBF flows changes the annual volumes released from Glen Canyon Dam or Lake Powell storage.

The Secretary has before her a FONSI [final 2002] that culminates in a January 2005 BHBF. If there is a sediment trigger and the Secretary decides to have a BHBF in WY05, AMWG recommends that the BHBF be conducted in November - December 2004 as a package with mechanical removal in WY 2005; with consultation, a supplemental EA, and public outreach by the Public Outreach Ad Hoc Group; with fluctuating flows (from 5,000 to 20,000 cfs) that continue adaptively (as needed for non-native control) through April; and with a public outreach component.

Motion passed; 19 voted yes, 0 voted no, 1 abstained.

In making this recommendation, the AMWG (without a dissenting vote) desired to formulate a WY 2005 flow regime that was effective at testing the hypotheses of sediment conservation and humpback chub protection in a way that respected the financial condition of the Basin Fund, which is funded by power revenues and is the primary source of funding for the Adaptive Management Program. However, this recommendation and the recommendation immediately above do present an unclear picture of the intent of the AMWG.

At the request of Bennett Raley Assistant Secretary for Water and Science, to gain clarification on the two recommendations, the AWMG participated in a conference call on August 20, 2004. This conference call focused on the two recommendations for experimentation during WY 2005. During this conference call, several members indicated that the discussion during the AMWG

meeting was somewhat confusing, that they had been led to believe the Basin Fund is in dire enough condition to merit abandoning the high flow test, and that they would vote against the motion (no BHBF) if it were reconsidered. Although the Basin Fund was discussed at the AMWG meeting, no actual data were presented either on the status of the Basin Fund, or the cost of proposed experimentation during WY 2005.

The timeframe for responding to this recommendation is important, since implementing the low flow dam release regime that would precede a high flow test could start as early as September 1, 2004, if sufficient Paria River sediment inputs occur. As your designee, I believe the first of these two recommendations should be interpreted as a statement of concerns about the Basin Fund and about the public perception of releasing flows during a drought -- rather than actual operational preferences. Furthermore, the second motion should be interpreted as a desire of the AMWG to move forward with the experimentation, regarding actual operations, in a modified manner to limit any potential adverse impact to the Basin Fund. I believe this was clearly demonstrated by near unanimous approval of the second motion and by the statements of the AMWG members during the conference call referenced above. Accordingly, it is my recommendation that the Department of the Interior proceed in a manner consistent with the second motion and implement those concepts during WY 2005, which would require implementing compliance activities immediately.

Tribal Funding from Appropriations

Recommend to the Secretary that, upon passage of the DOI Appropriations Act, the Secretary retain and transfer $380,000 to Reclamation, who will include an additional $95,000 for immediate distribution to the Tribes to fund Tribal Activities associated with the AMP. This transfer will reflect a contribution of $95,000 from each DOI agency: BIA, NPS, USGS, FWS, and Reclamation, based on the Secretary's commitment.

Passed by consensus.

The Assistant Secretary for Policy, Management and Budget historically has issued memoranda directing Department of the Interior agencies to provide appropriated funding to support tribal involvement and consultation in the Adaptive Management Program. The most recent was signed March 2, 2004. In 2004, only Reclamation and the NPS were timely in providing these funds. Numerous difficulties contributed to this circumstance, including miscommunication between Washington, D.C. and field staffs, inadequate funding at the field level to cover this requirement, and unclear assignments of responsibility for ensuring the funds transfer actually occurred. The AMWG made this recommendation as a means of simplifying and streamlining this process.

The Adaptive Management Work Group meeting will be held on October 25-26, 2004, in Phoenix, Arizona. Agenda items likely will include Fiscal Year 2006-07 work plans and progress reports on temperature control device environmental compliance, experimental flows and mechanical removal of non-native fish, and the tribal consultation plan. I will forward any recommendations that may result from the October meeting.

If you concur with the report and recommendations in this memorandum we have also attached a memorandum to the Assistant Secretaries (attachment 2) for your consideration and use.

Attachments - 2

cc: Assistant Secretary - Policy, Management and Budget
Assistant Secretary - Fish and Wildlife and Parks
Assistant Secretary - Bureau of Indian Affairs
(w/att 1 to each)

bc: Secretary's Surname
Secretary's Reading Files (2)
(w/atts to each)
ASWS (3)
(w/atts to one copy)
W-1125, W-2010
D-2000
UC-100, UC-733
(w/atts to each)

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August 18, 2004

The Honorable Secretary Gale Norton
Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: MINORITY REPORT ON AMWG RECOMMENDATION NOT TO CONDUCT A BEACH/HABITAT BUILDING FLOW IN GRAND CANYON IN WY 2005

Dear Secretary Norton,

You are receiving two recommendations from the Adaptive Management Work Group (AMWG) as a result of its recent meeting – 1) to not conduct a BHBF in WY 2005, and 2) to conduct a BHBF in the November-December period of 2004 (WY2005) if there is a sediment trigger. The purpose of this minority report is to inform you of the reasons that we did not support the first motion. We also want to emphasize that we strongly support the second motion. Our recommendation is to continue allowing for sediment triggered events in WY 2005, consistent with your original decision, and to modify flow timing as identified in the second motion unanimously passed by the AMWG.

In December 2002, you approved a set of experimental flow treatments from Glen Canyon Dam that included an element that was tied to sediment availability. This "sediment conservation experiment" portion of the treatments included a BHBF of between 42,000 and 45,000 cfs in the first week of January, if a sediment input trigger from the Paria River was met. The BHBF would be trigger-driven, and not tied to any particular year (p. 23, EA on Proposed Experimental Releases from Glen Canyon Dam and Removal of Non-Native Fish, September 2002).

This sediment conservation experiment was designed to improve on the successes of the 1996 BHBF experiment, and better build beaches, sandbars and backwaters that support endangered fish, terrestrial plants and animals. Increased sediment in the river system would restore depleted camping beaches for visitors and may provide one of the few system-wide treatments for preserving archeological sites and other cultural resources. We learned from the 1996 BHBF that the amount of sediment in the system at the time of the BHBF is important, and that the period of high flows could be minimized to reduce the amount of sediment export while depositing significant amounts of sand high on the river's banks. The sediment conservation experiment you have approved is designed to take advantage of sediment-enriched conditions by following tributary inputs, while attempting to minimize the quantities of sediment exported.

Along with this minority report, you are receiving a 13-6-1 vote to recommend that you not conduct a BHBF in WY 2005. If you accept this recommendation, you will vacate your previous decision. The undersigned AMWG members believe that such action would be unwise, and urge you to reject the recommendation for the following reasons.

1. *Stay your course*. Your original decision to conduct an experiment to conserve sediment was the right decision, for the reasons stated above.

2. *Conflicts with unanimous recommendation*. The first motion to not conduct a BHBF in WY 2005 and the second motion to change the timing of the BHBF in WY 2005 should a sediment trigger be achieved are contradictory recommendations and reflect the limited thought given to the implications of the two motions. No explicit guidance was given to the other aspects of the flow experiment as they relate to sediment in WY 2005. For example, would there still be low fall flows given a sediment input?

3. *Opportunities for this experiment are rare*. Although we are sensitive to the current drought and public perceptions about powerplant bypasses while reservoir storage is low, the sediment triggers that would allow for this experiment are proving to be rare. Should the trigger occur this fall, and be passed by, there is no guarantee that another trigger would occur in the near future. Furthermore, the amount of water that would bypass the powerplant during a two-day BHBF would not be excessive (about 90,000 acre-feet), and certainly would not exacerbate the falling reservoir levels in Lake Powell, since it would not change the annual delivery from Powell and probably would not even change the scheduled monthly volume.

4. *Not the way to minimize costs*. We are sensitive to the precarious state of the Colorado Basin Fund, since the AMP currently receives most of its funding from the Basin Fund. However, sacrificing an opportunity to conserve sediment and validate a successful hypothesis on dam operations would not be necessary in order to stretch the Basin Fund. Other cost-saving options are available and seem prudent. You are also receiving a recommendation to conduct a BHBF in the November-December period, along with extending the mechanical removal of non-native fish and fluctuating non-native fish suppression flows (possibly into April), which could prove to have similar cost-saving benefits for the Basin Fund without sacrificing necessary experiments and expected benefits to resources in the Canyon. Fluctuating non-native fish suppression flows are less of a cost to the Basin Fund than ROD flows, and conducting a BHBF in November-December rather than January would reduce the cost to the Basin Fund of continuing low flows during that late fall/early winter period once the sediment trigger had been met.

5. *Counteract other sediment losses*. Since the AMWG is recommending that you continue fluctuating non-native fish suppression flows regardless of your decision on a BHBF, due to the desire to see if we can produce a more detectable signal in terms of benefit to humpback chub from this action, it would be wise to try to counteract the loss of sediment, particularly in Marble Canyon, from this experimental action. GCMRC has documented a decline in the mass balance sediment budget in this section during the fluctuating non-native fish suppression flows, which is troubling given that we currently have a negative mass balance sand budget throughout the system. If you do not conduct a sediment conservation experiment this year if we have a trigger, we lose the opportunity to turn that situation around.

6. *Do public outreach*. The AMP has now established a public outreach program and is positioned to educate the public about our actions that may not be otherwise understood by the

media and the public, such as conducting a BHBF in drought conditions. Our public outreach arm could work with your public affairs office to educate the public in support of your decision to continue actions and experiments designed to benefit the resources of the Grand Canyon.

We encourage you to recognize the concerns that underlie the votes to recommend that you not conduct a BHBF in WY 2005, but reject that as a recommendation, and instead accept the wiser recommendation to move the BHBF to the November-December time frame if a sediment trigger occurs. Your Interior agencies were split on the "no BHBF" vote, which barely registered a two-thirds majority, but they were all in agreement on doing a fall BHBF, as essentially was the AMWG, which passed that motion with no dissent and only one abstention. We believe that the true recommendation is the one that received overwhelming support, and we ask you to proceed accordingly.

Sincerely,

Pamela Hyde
AMWG Member
Grand Canyon Wildlands Council

Darryl Beckman
AMWG Member
Bureau of Reclamation

Nikolai Ramsey
AMWG Member
Grand Canyon Trust

Jeffrey Cross, Ph.D.
AMWG Alternate
Grand Canyon National Park

Mike Yeatts
AMWG Alternate
Hopi Tribe

Andre Potochnik, Ph.D.
AMWG member
Grand Canyon River Guides

THE SECRETARY OF THE INTERIOR

WASHINGTON

FEB 1 4 2005

MEMORANDUM

To: Assistant Secretary - Policy, Management and Budget
Assistant Secretary - Water and Science
Assistant Secretary –Fish and Wildlife and Parks
Assistant Secretary - Indian Affairs

From: Secretary Gale A. Norton

Subject: Concurrence with Glen Canyon Dam Adaptive Management Work Group Recommendations

I am in receipt of a memorandum from Mr. Michael Gabaldon, my designee for the Glen Canyon Dam Adaptive Management Work Group (AMWG), dated September 17, 2004, (copy attached) in which the AMWG made specific recommendations concerning releases from Glen Canyon Dam in water year 2005, and the Department's funding of tribal participation and consultation in the AMWG.

I concur with the recommendations set forth in Mr. Gabaldon's memorandum, including the potential release of a Beach Habitat Building Flow in the fall months of 2004, subject to the sediment inflow conditions identified in the Department's November 2002 environmental documentation regarding the experimental flow release program.

Accordingly, I ask that you and your staff work to promptly implement each of these recommendations, subject to any appropriate environmental compliance or other applicable Departmental procedures.

Attachment

cc: Director, U.S. Geological Service
Commissioner, Bureau of Reclamation
Director, Fish and Wildlife Service
Director, National Park Service
(w/copy of att to each)