

December 15, 2022

Recreational Fishing Comments
on the Glen Canyon Dam/Smallmouth Bass Environmental Assessment

As the AMWG Recreational Fishing Representative in the Glen Canyon Dam Adaptive Management Program, I appreciate the attention given to this threat to the river system and the efforts by BOR, GCMRC and the SMBAHG to offer and consider strategies to address the problem.

While the request is to comment specifically on the flow options being considered under the EA, it is imperative that the response to warm-water invasive species is not dependent entirely on flow manipulation, but rather the plan must be multi-faceted. Given the likely conditions that we are projected to face within the river system for perhaps the foreseeable future, the plan must include a commitment to continue all of these interventions for an extended period of time, or until the efforts prove hopeless due to continuing worsening conditions.

These other strategies should include, but not be limited to:

- Ongoing, expanded monitoring of the extent of warm-water invasive species in the entire river system.
 - This should continue to include sampling in the Lees Ferry reach and in particular, areas in that reach that are more prone to harbor these species.
 - Sampling in the LCR area specifically to gauge impact as quickly as possible.
 - Sampling in and around all other warm water tributaries farther downstream that could become refuges for these species.
 - Continue to monitor the effectiveness of the Pearce Ferry rapid as a deterrent to upstream movement of warm-water invasive species.
- Sound data collection and analysis to determine the effectiveness of mechanical removal as a deterrent in the expansion of these species in these different locations and have that inform future actions.
 - The use of mechanical removal as the primary tool is unlikely to have any significant impact on addressing the problem. It should only be employed if there is confidence in its effectiveness as a tool, and genuine commitment to employ other key strategies including the strategies being considered as part of this EA.
- Efforts to limit the movement of warm-water invasive species from Lake Powell through Glen Canyon Dam and movement of these species upstream from Lake Mead in the event that conditions change at Pearce Ferry Rapid or if flow manipulations from Glen Canyon Dam cause that barrier to become less effective.
- Actions to increase colder water flow through that area should be considered if the sloughs downstream from the Glen Canyon Dam are found to be a major contributor to the problem.
- Development of plans and the capacity to immediately implement those plans as threats farther downstream, nearer to the native species that are threatened by this invasion, become apparent.
 - What measures are being readied to be implemented in and around the LCR?
 - What measures are being implemented to keep warm-water downstream tributaries from becoming sanctuaries for these species?
- Continued education and pressure to reduce the use of water in the system so that the lakes can return to levels that allow for deeper, colder water that protect the river system from these warm-water invasive threats and allows for more effective use of the dams for power generation.

With regard to the specific flow options being considered as part of the EA, the caveat on PowerPoint slide 29 of the presentation “Success of any of these options depends on available hydrology” is crucial to any decision. The availability of cold water and sufficient lake level capacity to allow for flow spikes, and the willingness to sacrifice power generation capabilities and water delivery at times that might be different than power or downstream users would prefer, is all part of the considerations that must be agreed to if this threat is to be managed effectively.

Of the options presented in the EA, Option B seems to offer the highest probability of success in reducing the threat with Option A as the second best option.

Thank you for the opportunity to provide comment on this EA.

Jim Stroger

Jim Stroger
Glen Canyon Dam Adaptive Management Program
AMWG Recreational Fishing Representative