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Geoffrey S. Barnard
Flagstaff, AZ

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STATEMENT BY THE GRAND CANYON TRUST

Grand Canyon Trust was a major proponent of passage of the Grand Canyon Protection Act in 1992. The Trust has been part of the resulting adaptive management program since its inception. The program was intended to be the framework for improving the ecological health of the Colorado River through Grand Canyon as required by the Grand Canyon Protection Act.

A well-publicized "artificial flood" through Grand Canyon in 1996 launched the Adaptive Management Program (AMP). However, the benefits of that flood have long since washed downstream. The Trust has become more and more frustrated with the lack of additional action. In fact, the Colorado River is in decline and the AMP response has not been sufficient to reverse negative trends. The latest science reports that two of the most important resources—endangered native fish and sediment—are in substantial decline.

The AMP needs to be refocused on its obligations under the law. This process must address significant deficiencies currently in evidence:

- The Bureau of Reclamation is required to implement the Reasonable and Prudent Alternative (RPA) in the Biological Opinion for the endangered Colorado River native species, including the humpback chub and razorback sucker. The Bureau is almost certainly falling short of implementing the RPA and is failing to conduct an annual review of progress as required by the Biological Opinion.
- It now appears the 1996 EIS Record of Decision was based on a false assumption. The ROD assumes that fine sediment is stored in the main river channel indefinitely and can be deposited on higher ground for environmental benefits whenever the hydrology and power needs allow for a big flood release from the dam. The latest science, however, shows this assumption to be false, that the river corridor acts essentially as a pipe, not a bathtub, and that sediment is quickly washed through the system. If the sediment is to be available for ecological benefits (rebuilding beaches, scouring backwaters for native fish, etc.), there is a critical time frame for "using" the sediment. A supplemental EIS may be required to incorporate this new science.
- In addition, new data indicates humpback chub populations are in substantial decline, not stable as assumed in the data used in developing the Glen Canyon Dam EIS and the 1996 ROD. NEPA requires a



supplemental EIS and the Endangered Species Act requires new consultation under circumstances where significant new information affecting a critical environmental resource becomes available, as appears to be the case here.

- Recovery goals for the four Colorado River endangered fish—humpback chub, razorback sucker, Colorado pike minnow, and bonytail chub—are soon to be released by the Fish & Wildlife Service. The draft recovery goals are inadequate in numerous ways and should be challenged if the final versions are not improved.

The Colorado River in the Grand Canyon is in worse shape now than it was in 1992 when the Grand Canyon Protection Act was passed. The time is ripe for energizing the AMP to better care for the river in the Grand Canyon.

Geoffrey S. Barnard
President
Grand Canyon Trust