

GRAND CANYON TRUST

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Randall Peterson
Bureau of Reclamation
125 S. State Street
Salt Lake City, UT 84138-1147

March 8, 2002

Dear Randy:

Following are the Grand Canyon Trust's brief comments on the draft 2002 AMWG Report to Congress.

Purpose of this Report

It is important to state the purpose of this report to Congress. Since this report is in response to requirements established by Congress in the Grand Canyon Protection Act (GCPA), it is logical to assume that this is the mechanism by which the Congress will evaluate whether or not the requirements of the GCPA are being met. With this in mind it is also important to state clearly the current effectiveness of the Adaptive Management Program (AMP) in achieving the goals of the GCPA.

The sections on the History of Glen Canyon Dam, A Need for Scientific Evaluation, Glen Canyon Dam Adaptive Management Program, Summary of Dam Operations, Administrative Activities, and Adaptive Management Program Scientific Activities are thorough and well written.

Status and Trends of Downstream Resources

The section on the Status and Trends of Downstream Resources contains conclusions drawn from the studies to date. The information in the document would be more effectively organized if the status and trends information were kept separate from the additional action discussions. We recommend that you add a section titled, "Conclusions and Recommended Future Actions." This section should follow the status and trends section and provide conclusions regarding program effectiveness that is drawn from the status and trends data. It is important that this report accurately convey to the reader how effectively the Adaptive Management Program is achieving the goals of the GCPA. This section should also include a discussion of what additional actions or changes to

the program are recommended to improve the status and trends of resources that are not responding favorably to the current program.

Specific Comments on Status and Trends:

Endangered Fish: It is very likely that cold water temperatures created by the dam contributes significantly to factors causing the decline of the humpback chub population. Water temperature in the main channel in the vicinity of the LCR is colder than the lowest level needed for successful spawning and egg incubation. This should be added as a factor to be considered.

Water clarity during most of the year may contribute to predation of young of the year and juvenile chub. This species evolved in a sediment rich and usually turbid aquatic environment where lack of visibility was beneficial to chub survival. Trout feed mostly by sight and therefore their ability to see and eat chub is enhanced by the clear water that prevails in this section of the Colorado River. Water clarity should also be listed as a possible factor contributing to the decline of the humpback chub population.

Recreational Resources: The last paragraph in this section indicates that beach erosion can be offset by BHBFs greater than power plant capacity. Monitoring has shown that sand deposited during these flows begins to erode immediately, especially during flow rates in excess of 15,000 CFS. Thus, this statement is misleading unless further qualified by stating that these BHBFs need to be done at least once a year to maintain beaches. This frequency has not yet been achieved.

Sediment: The conclusion that the two primary ROD assumptions related to conserving sandbar resources have proven to be false is an extremely important piece of information. We believe that this information needs to be emphasized and that additional management actions needing to be taken to remedy this problem be articulated in the new section, Conclusions and Proposed Future Actions.

Summary of Current Ecosystem Conditions

This is one the most important sections of this report. Many readers will go directly to this section to learn what the conditions are and whether the AMP is successfully achieving the goals of the GCPA. Since this is a report to Congress, this section should much more thoroughly state current conditions relative to program expectations.

Specifically, the dramatic decline in the humpback chub population and decrease of sediment in the river system are crucial information pieces and should therefore be moved to the front of this section and highlighted.

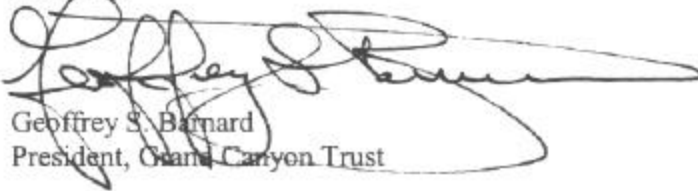
Conclusions and Recommended Future Actions

In addition to making conclusions regarding the effectiveness of major mitigation programs this section should provide conclusions regarding the overall effectiveness of the Adaptive Management Program. We believe that in spite of the best efforts of dedicated scientists and resource managers the Adaptive Management Program is not achieving the goals of the Grand Canyon Protection Act. It is timely and essential to recommend substantial program changes to actually mitigate the effects of the dam on downstream resources in Glen and Grand Canyons.

In short, this section needs to tell Congress that the Colorado River through Grand Canyon is in worse shape now than it was in 1992 when the Grand Canyon Protection Act was passed and that future actions are being recommended that will help meet the requirements of the GCPA.

Thank you for all the good work you are doing, Randy, and thanks for your time in considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoffrey S. Barnard", written over a printed name and title.

Geoffrey S. Barnard
President, Grand Canyon Trust