

March 3, 2004

Mr. Michael R. Gabaldon  
Bureau of Reclamation, Building 67  
6th and Kipling  
Denver, CO 80225-0007

Dear Mr. Gabaldon,

We the undersigned representatives of stakeholder organizations participating in the Glen Canyon Dam Adaptive Management Program wish to convey our deep dissatisfaction with the current status of the program. We feel that the program has gotten dangerously off-track and is no longer operating in conformance with the high standards established by the Grand Canyon Protection Act, the 1996 Record of Decision on Operation of Glen Canyon Dam, and the other documents that established the AMP. The consequential adverse impacts on the natural, cultural and recreational resources of the Colorado River ecosystem in Grand Canyon cause great concern for us all.

The AMP was the Secretary of the Interior's choice of approaches to accomplish his responsibilities to "protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use" under the Grand Canyon Protection Act. Upon review of the AMP in 1999, the National Research Council deemed this program "a science-policy experiment of local, regional, national and international importance." In our estimation, however, both the science and policy aspects of this program are in serious trouble, and the experiment is in danger of failing. We bring to your attention the following areas of concern:

*Grand Canyon Monitoring and Research Center:* The Grand Canyon Protection Act mandated the implementation of long-term monitoring programs and activities to ensure that the Secretary meets his/her responsibilities outlined above, to include necessary research and studies to determine the effects of the Secretary's actions. In the EIS, a research center was identified to accomplish portions of this mandate:

"To support the designee and the AMWG, it is recommended that the Secretary establish a research center within the U.S. Geological Survey (USGS) and/or National Biological Service with a small permanent staff in Flagstaff, Arizona. The center would be responsible for developing the annual monitoring and research plan, managing all adaptive management research programs, and managing all data collected as part of those programs. All adaptive management research programs would be coordinated through the center." (p. 36)

The Secretary accepted and implemented this direction in the Record of Decision. However, the GCMRC has departed from this direction in a number of key ways. First of all, the GCMRC increasingly fails to support the AMWG. We receive little information on the state of the natural, cultural and recreational resources, and virtually no information on how the budgeted funds of the program have been spent and what we have

received as a result. Although GCMRC has been recently challenged by changes in key personnel and internal reorganization, and has responsibilities outside the program as a function of being a USGS agency, this must not deter it from its central mission to provide essential and timely technical services to the AMP.

Second, at 21 permanent staff, two staff on detail from USGS, and at least eight student employees or contractors, GCMRC cannot be considered to have a “small” staff. In part, we believe that this stems from another key departure – that GCMRC has increasingly gone from an agency that *manages* the research and monitoring to one that *conducts* the research and monitoring. We believe it is critical that GCMRC focus primarily on managing scientific activities and data, developing annual monitoring and research plans, providing summary reports to the AMP, and soliciting proposals for as much field work to be done by outside contractors as possible.

Best available scientific techniques should without question include rigorous scientific peer review at multiple levels, and such peer review has existed in the history of the program. GCMRC developed detailed Peer Review Guidelines and Protocols in October 2001, and appeared to adhere to them at first. However, we are no longer certain that those guidelines and protocols are being followed, and we fear that the peer review process is being compromised. We ask that strict peer review standards be followed, and the peer review process be transparent, to ensure the highest quality science within the AMP.

*Technical Work Group:* Consistent with the EIS and ROD, the operating procedures for the TWG outline the role of the TWG as follows:

“This group is comprised of technical representatives who represent the various stakeholders on the AMWG. The TWG shall perform those tasks charged to them by the AMWG. Additional responsibilities of the TWG are to develop criteria and standards for monitoring and research programs; provide periodic reviews and updates; develop resource management questions for the design of monitoring and research by the Grand Canyon Monitoring and Research Center; and provide information, as necessary, for preparing annual resource reports and other reports, as required, for the AMWG.”

Our main concern is that the TWG has been operating outside its charge and in ways that harm the credibility and integrity of the program. Perhaps the AMWG has not met its responsibility to provide clear charges to the TWG, but progress in the TWG has ground to a virtual halt and the group seems to be without clear focus on what it needs to accomplish. Rather than rigorously pursuing technical issues, the TWG often takes a first cut at policy issues, sometimes taking on and recommending to AMWG issues that are at variance with the ROD. Increasingly, the TWG fails to follow basic procedural processes. Furthermore, the TWG tends to operate as if the AMWG is merely a rubber stamp for the TWG’s decisions. We feel that the TWG needs to be returned to its job as a technical subcommittee, responding to the needs of the AMWG and providing the technical advice and information that the AMWG needs for its policy deliberations. It also needs assistance in reestablishing a functional process for doing business.

*Science Advisors:* The EIS and ROD provided for one or more Independent Review Panels, and the Science Advisory Board was established as a partial fulfillment of that provision. The IRPs were to benefit both AMWG and GCMRC, so it was perhaps somewhat improper that GCMRC established and convened the SAB. Certainly the GCMRC's convening of the SAB gave rise to the perception that the SAB was for the benefit of GCMRC alone, and recent discussions (including an AMWG conference call in December 2003) have helped to rectify that misperception. We feel that it is critical that the SAB is responsive to both AMWG and GCMRC, and that the Science Advisors (including their Executive Secretary) maintain their independent, advisory role. To that end, we ask that the Science Advisors limit their active participation in the meetings of the AMWG, TWG and their ad hoc groups, in order to shield themselves from the politics that might compromise their independence. We also ask that the role, responsibilities and term of the Executive Secretary be clarified in the SAB Operating Protocols.

- *Legal Compliance:* Two categories of resources that fall within the purview of the AMP program also require specific mandated compliance activities beyond what is agreed to within the AMP program proper; they are the endangered species and the cultural resources. For both of these resources, agreements were put into place (prior to the signature of the Record of Decision) addressing the requirements of their respective acts and regulations (Endangered Species Act (ESA) and National Historic Preservation Act (NHPA)). Our concern is that the requirements identified in these agreements are not being met, either by the AMP program as a whole, or specifically by the lead agencies legally mandated to implement them.

The Biological Opinion (BO) and Reasonable and Prudent Alternative (RPA) established specific actions that needed to be implemented in order for the Bureau of Reclamation to remain in compliance with the ESA, most notably the evaluation of an operational scenario following the flow pattern of the Seasonally Adjusted Steady Flow scenario for approximately five years, in low volume water years. The current direction of the AMP experimental program appears to be away from flows resembling those identified in the RPA. If the activities identified in the RPA are no longer thought to be relevant, then actions to update it need to begin and the scientific data supporting those changes presented in a peer reviewed, comprehensive manner. Otherwise, long-term experimental designs need to incorporate the requirements of the RPA.

For cultural resources, the Programmatic Agreement set forth the mechanism for compliance with NHPA. This plan called for identification of the resources, development and implementation of a monitoring and remedial action plan, and the development of a long-term management plan (a historic preservation plan – HPP). Apart from the identification of the majority of resources, efforts have stalled on completing the second two tasks. A Monitoring and Remedial Action Plan was developed, but has never been fully implemented. Development of the HPP likewise stalled, and many remedial activities now seem contingent on its completion. In the mean time, archaeological and

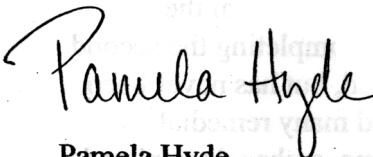
cultural sites continue to erode with the cultural and scientific values contained in them being lost.

- ***Budget process:*** The process for developing and approving annual budgets for the AMP has completely broken down. This has a serious ripple-effect on the rest of the program. Decisions about monitoring, research and experiments to be conducted as part of the program get made at the last minute without due consideration or scientific review because of poor budget planning and insufficient information on program accomplishments and costs. Consequently, the AMP Strategic Plan, which serves as a guide for accomplishing the vision, mission and goals of the program, is ignored, and no coherent strategy for achieving positive results for the resources is developed on an annual basis. The GCMRC, TWG and AMWG each need identified processes for completing their roles in developing and approving annual budgets to be forwarded to the Secretary, and those processes must be strictly followed.

It is possible to bring this deteriorating situation back on track. The AMP was once known internationally as one of the most successful examples of adaptive ecosystem management on a large landscape scale, and if we follow our founding direction, protocols and scientific rigor we can achieve that status again. Indeed we must, because the Secretary of the Interior still operates under the mandates of the Grand Canyon Protection Act, and to meet those mandates we have to use our best tools, information and scientific practices to reverse the declining resource trends that have been plaguing the Colorado River ecosystem for decades. To fail to do so is not an option.

As members of the AMWG, we recognize that we are complicit in the failings of this program. Many of the problems that have evolved can arguably be traced to a lack of direction provided by the AMWG and/or our own dysfunction. Although our duties seem simple, we have come to learn that they are not. We need to step up and provide more direction for the program, and take responsibility for ensuring that it provides the Secretary with what she needs to fulfill her mandates under the Grand Canyon Protection Act. We suggest that the AMWG, perhaps through an ad hoc group, actively review what is necessary to bring the program back on track, scrutinizing all aspects of the program. We expect that changes will need to be made, including perhaps the frequency with which the AMWG meets and the way that it provides leadership for the rest of the program. We request your assistance and support in renewing the AMP process.

Sincerely,



Pamela Hyde  
Grand Canyon Wildlands Council



Nikolai Ramsey  
Grand Canyon Trust