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Mr. Michael Gabaldon, D-2000
Bureau of Reclamation
Denver Federal Center
PO Box 25007
Denver, CO 80225-0007

P.O. Box 1934
Flagstaff, AZ 86002
(928) 773-1075 Phone
(928) 773-8523 Fax
gcrgr@infomagic.net

Dear Mr. Gabaldon,

The Colorado River ecosystem in Grand Canyon is critically important to our constituency. As the recreational stakeholder in the Adaptive Management Program (AMP) since its inception in 1996, we seek to unify and direct the concerns of the river community regarding science and policy issues related to Glen Canyon Dam. You recently requested that members of the Adaptive Management Work Group comment on the procurement issue—that is, how the Grand Canyon Monitoring and Research Center conducts its workload. We do so below, and have also taken this opportunity to make additional observations and recommendations that we feel will strengthen the program and provide it with a more productive, long-term direction.

General Comments on Grand Canyon Monitoring & Research Center

Overall Performance:

First, we want to commend the Grand Canyon Monitoring and Research Center (GCMRC) and cooperating scientists for a job well done. The GCMRC is doing an outstanding job of putting trips on the water to collect crucial information. As river guides, we understand the physical and logistical difficulties of river operations and applaud the organization's achievement in running efficient and safe trips. The sediment program is particularly well run and has led to new breakthroughs in our understanding of sediment transport and distribution. Experiments are now underway to test new hypotheses and, we hope, mitigate the alarming trend of sand bar loss.

We also appreciate GCMRC's efforts in informing the stakeholder groups about the resources of concern. The adaptive management program's forward progress on a number of issues has been due to

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GCMRC guidance. Nonetheless, the GCMRC can do a better job in a number of areas, and we offer these constructive criticisms.

Procurement:

Much of the recent criticism of the GCMRC has focused on whether work should be conducted by in-house personnel or by outside contractors. It includes concerns about open competition for grants and the peer review process. We believe that it is in the best interest of the adaptive management program to sponsor in-house GCMRC projects *and* utilize outsourced contracts and cooperative agreements with outside groups. GCMRC should outsource work via competitive bidding when appropriate. In some situations, however, it makes more sense for GCMRC to conduct research itself, especially when it can more quickly or cost-effectively perform an established task. In these cases, GCMRC should be prepared to explain exactly why it makes sense for the project to be conducted in-house. In-house projects should undergo the same process of rigorous scientific review required of outside groups.

Budget-Related Communication:

The process of developing yearly budgets has frustrated us. While the problem does not fall entirely on GCMRC, more effective communication about the center's proposed projects is required if the process is to be improved. Explanations of many of the projects presented by GCMRC during the last two years have lacked detail. Furthermore, the program's budget needs to be made completely transparent; detailed spreadsheets of individual project expenditures from previous years should be made available to those reviewing the budget. The adaptive management program is large and complicated, and the GCMRC should not feel that additional requests for information are an attempt to micromanage the science center. Rather, it is our job as stakeholders to understand and review the allocation of resources within the program. Our requests for additional information are motivated by the need understand the work plan and budgets.

Food Base Program:

The GCMRC did not effectively communicate with the Technical Work Group (TWG) about the discontinuation of the food base program. This crucial aspect of the monitoring program was completely dropped, and a detailed explanation of the situation was not provided until it was too late for the TWG to provide input. At present, the AMP does not have a program in place to monitor the benthic ecology of the river. GCMRC has since explained the discontinuation, but we feel that it did a poor job

communicating the need for removing a monitoring program that had been collecting information for over 10 years.

GCMRC Strategic Plan Development:

The Adaptive Management Work Group (AMWG) should ensure that GCMRC develops a strategic plan that is in step with the AMP strategic plan, and does so as soon as possible. This objective would be accomplished most effectively with oversight of the science advisors and the AMWG Strategic Plan ad hoc committee.

General Comments on the Adaptive Management Program

Communication and Effectiveness:

GCRG believes that many of the criticisms of the AMP could be addressed by more effective communication among the TWG, AMWG, and GCMRC. The AMWG needs to assign specific tasks to be accomplished by the Technical Work Group prior to each AMWG meeting, and both groups should follow their operating guidelines. Regular assignment of tasks to TWG may necessitate more frequent meetings of the AMWG—perhaps quarterly—resulting in a rededication and rejuvenation of its leadership role with respect to the Technical Work Group.

Budgeting

As discussed above, the budget development process needs to be revised. Over the past two years, the budget review process has led to an increased level of tension and mistrust between the GCMRC and the TWG and AMWG, which is detrimental to the program. The AMWG, TWG, and GCMRC need to rededicate themselves to working together on these issues, not fighting over them. No one is to blame for the situation, but everyone should feel responsible for getting this critical aspect of the program back on track.

As part of the solution, we should adopt a long-term budget for GCMRC, ensuring that budget discussions don't consume three TWG meetings per year. Perhaps a two-year budget review cycle, as proposed by GCMRC, should be the first step toward this end.

Funding

Additionally, the Adaptive Management Program as a whole is underfunded. During the past two years the program has become responsible for new overhead charges, additional projects relating to endangered native fish species, and the implementation of experimental

flows and management actions. GCRG supports these new projects and believes they are important aspects of the program. However, we object to the fact that these new programs were funded by cutting core monitoring activities. New work must be funded by additional money from the Department of Interior. Perhaps these funds could be provided through the Department of Interior agency responsible for the project in question (e.g., the U.S. Fish and Wildlife Service), or perhaps they could be allocated directly to the Adaptive Management Program. Either way, a monitoring center cannot be successful if it is forced to cut its monitoring activities. The program has failed to demonstrate a willingness to step up and ask for more funding, when it is clearly needed to accomplish the goals of the program. We feel it is our responsibility to do so now.

Long-Term Experimental Flow Plan:

Adaptive management principles stress the explicit integration of scientific, economic, and social (recreational) concerns into efforts addressing resource problems. A measured, long-term approach is crucial for creating that scientifically credible framework. Good science takes time, and it takes a commitment from the stakeholders in this process to be patient with answers that are slow in coming, based on hard data and long-term monitoring. A long-term approach to flow management will ensure that good science is not abandoned due to time constraints. Recommendations made to the Adaptive Management Work Group should never be made hastily as the next water year approaches.

We recommend continuing the first four-year experimental flow pattern as originally designed by GCMRC and approved by the science advisors, while in the meantime developing a well thought-out long-term experimental flow plan. Adopt a 10-year plan of research experimental flows. It is counterproductive to expend time and energy fighting about flows a year at a time

Endangered Native Fish:

The AMWG should advocate for a real test of the Seasonally Adjusted Steady Flow alternative as proposed in the Glen Canyon Dam Record of Decision to satisfy the RPA for native fish. If new information shows that this alternative is not beneficial for native fish, we should advocate for new consultation by the agencies.

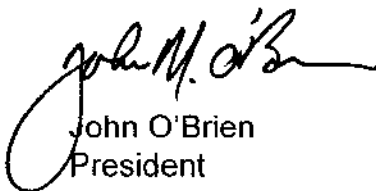
Beach Habitat-Building Flows:

The AMWG should recommend that all future sandbar-building releases be triggered by sediment inputs and be timed to immediately follow those events. This timing has been demonstrated to maximize

benefits for Grand Canyon sediment resources, which in turn benefit the rest of the system. Incorporating sediment-triggered releases into the dam's normal operations, instead of tying them to experiments, ensures the flexibility needed for the conservation and protection of downstream resources in compliance with adaptive management principles. We have learned what is best for the resource in this case; now we must incorporate that knowledge into our management practices.

We appreciate the opportunity to air our views and concerns. Grand Canyon River Guides is dedicated to working within this process to achieve our primary goal of protecting Grand Canyon according to the letter and spirit of the Grand Canyon Protection Act of 1992. Although the Adaptive Management Program has made steady progress over the years, it has been glacially slow at recovering and conserving sand bars, cultural resources, and the native ecosystem. Good science takes time; but it also requires effective direction and appropriate funding, and the Adaptive Management Program has been hampered by inadequacies in each. Our members, in 48 states of the union and several foreign countries, are deeply passionate about protecting Grand Canyon. They are frustrated at what appears to be an enormous expenditure of effort and dollars with little to show for it. For us, it is critical that we work together and take strong strides forward that show meaningful on-the-ground progress. Please inform the secretary that we are prepared, if necessary, to advocate for a supplemental EIS on Glen Canyon Dam and other measures to satisfy the public's concern for this great national resource. We look forward to hearing from you about the possibilities for positive change to this vital program.

Sincerely,



John O'Brien
President



Andre Potochnik
Adaptive Management Work Group



Lynn Hamilton
Executive Director



Matt Kaplinski
Technical Work Group