

LIVING RIVERS

COLORADO RIVERKEEPER[®]

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RE: Comments Relative to the Reporting Requirements and Congressionally Mandated Goals of the Glen Canyon Dam Adaptive Management Program.

The Glen Canyon Dam Adaptive Management Program (AMP) has been in operation for nearly eight years, and a comprehensive research and monitoring program has been functioning for over 15 years. Progress in understanding the ecological processes that drive the aquatic ecosystem of the Colorado River in the Grand Canyon has been reported and is generally considered to be meeting the science program goals as stated in the EIS ROD and AMP Charter. In contrast, the relative success of the AMP in using this information to achieve the goals of the Grand Canyon Protection Act (GCPA) has been poorly and inconsistently reported. The GCPA requires the AMP to submit an annual report to Congress and the Governors of the basin states. As defined by item E of the AMP Charter, the Adaptive Management Working Group (AMWG) is to "review and provide input on the report required in Section 1804 (2) of the Act The report will include discussion of dam operations, the operation of the AMP, status of resources, and measures taken to protect, mitigate, and improve the resources defined in the Act." To date, only a single report combining the information for water years 1999-2001 has been submitted. Progress in mitigating the adverse impacts to Grand Canyon resources during 2002 and 2003 has yet to be reported. The AMP is obligated to ensure that Congress and the public are kept up to date as to whether this program is succeeding.

Duties, Section F of the AMP Charter charges the AMWG to "Annually review long-term monitoring data to determine the status of resources and whether the AMP Strategic Plan goals and objectives are being met. More importantly, the AMWG is directed to "if needed, develop recommendations for modifying the GCDEIS ROD, associated operating criteria, and other resource management actions pursuant to the Grand Canyon Protection Act.

The science program has identified the key ecosystem processes that create and maintain the ecological integrity of the Colorado River in the Grand Canyon. These are: Annual inputs of large amounts of nutrient laden sediment, seasonal variability of water flows that

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creates the dynamic physical environment, and seasonal variability of water temperature. **The very foundation of National Park System natural resource stewardship is the protection of ecosystem processes, for it is these processes that sustain the diversity, abundance and distribution of native species.** The National Park System was created by Congress to protect the health and diversity of our nation's unique natural and cultural heritage. The success of this AMP must be measured by how well it protects and enhances these critical ecosystem processes.

The single report submitted to date clearly indicated that none of the dam related impacts to key ecological processes or other affected resources such as the Humpback Chub had been successfully mitigated. In fact, many of these components and critical resources were in a state of decline.

It is unclear how the AMWG defines success. The minutes of your recent retreat indicate this unfortunate ambiguity, as one participant asked, "How do we get to the end" Although the ROD provides for the AMP to operate "indefinitely". Fiscal responsibility alone requires that at some point either the goals are achieved, or its admitted that they can't be achieved. It's critical that the AMWG review how it defines program success, and does so in terms of the conditions of Grand Canyon resources.

In summary, considering the continued decline of the ecosystem in Grand Canyon National Park, it is imperative that the AMWG rededicate itself to achieving the goals of the GCPA, or recommend a new program that can. The AMWG must clearly define success in terms of the condition of Grand Canyon resources, meet the reporting requirements of the GCPA, clearly articulate the success or failure of adaptive management actions in these reports, and immediately request a Supplemental EIS and a new ROD that will enhance the AMWG's ability to achieve the success contemplated by the GCPA.

Living Rivers and our supporting groups from across the country look forward to hearing from you as to how and when the AMWG will address these matters.

Sincerely,



David Haskell

Policy Director, Living Rivers