August 18, 2004

The Honorable Secretary Gale Norton
Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: MINORITY REPORT ON AMWG RECOMMENDATION NOT TO CONDUCT A BEACH/HABITAT BUILDING FLOW IN GRAND CANYON IN WY 2005

Dear Secretary Norton,

You are receiving two recommendations from the Adaptive Management Work Group (AMWG) as a result of its recent meeting – 1) to not conduct a BHBF in WY 2005, and 2) to conduct a BHBF in the November-December period of 2004 (WY2005) if there is a sediment trigger. The purpose of this minority report is to inform you of the reasons that we did not support the first motion. We also want to emphasize that we strongly support the second motion. Our recommendation is to continue allowing for sediment triggered events in WY 2005, consistent with your original decision, and to modify flow timing as identified in the second motion unanimously passed by the AMWG.

In December 2002, you approved a set of experimental flow treatments from Glen Canyon Dam that included an element that was tied to sediment availability. This "sediment conservation experiment" portion of the treatments included a BHBF of between 42,000 and 45,000 cfs in the first week of January, if a sediment input trigger from the Paria River was met. The BHBF would be trigger-driven, and not tied to any particular year (p. 23, EA on Proposed Experimental Releases from Glen Canyon Dam and Removal of Non-Native Fish, September 2002).

This sediment conservation experiment was designed to improve on the successes of the 1996 BHBF experiment, and better build beaches, sandbars and backwaters that support endangered fish, terrestrial plants and animals. Increased sediment in the river system would restore depleted camping beaches for visitors and may provide one of the few system-wide treatments for preserving archeological sites and other cultural resources. We learned from the 1996 BHBF that the amount of sediment in the system at the time of the BHBF is important, and that the period of high flows could be minimized to reduce the amount of sediment export while depositing significant amounts of sand high on the river's banks. The sediment conservation experiment you have approved is designed to take advantage of sediment-enriched conditions by following tributary inputs, while attempting to minimize the quantities of sediment exported.

Along with this minority report, you are receiving a 13-6-1 vote to recommend that you not conduct a BHBF in WY 2005. If you accept this recommendation, you will vacate your previous decision. The undersigned AMWG members believe that such action would be unwise, and urge you to reject the recommendation for the following reasons.

1. *Stay your course.* Your original decision to conduct an experiment to conserve sediment was the right decision, for the reasons stated above.

2. *Conflicts with unanimous recommendation.* The first motion to not conduct a BHBF in WY 2005 and the second motion to change the timing of the BHBF in WY 2005 should a sediment trigger be achieved are contradictory recommendations and reflect the limited thought given to the implications of the two motions. No explicit guidance was given to the other aspects of the flow experiment as they relate to sediment in WY 2005. For example, would there still be low fall flows given a sediment input?

3. *Opportunities for this experiment are rare.* Although we are sensitive to the current drought and public perceptions about powerplant bypasses while reservoir storage is low, the sediment triggers that would allow for this experiment are proving to be rare. Should the trigger occur this fall, and be passed by, there is no guarantee that another trigger would occur in the near future. Furthermore, the amount of water that would bypass the powerplant during a two-day BHBF would not be excessive (about 90,000 acre-feet), and certainly would not exacerbate the falling reservoir levels in Lake Powell, since it would not change the annual delivery from Powell and probably would not even change the scheduled monthly volume.

4. *Not the way to minimize costs.* We are sensitive to the precarious state of the Colorado Basin Fund, since the AMP currently receives most of its funding from the Basin Fund. However, sacrificing an opportunity to conserve sediment and validate a successful hypothesis on dam operations would not be necessary in order to stretch the Basin Fund. Other cost-saving options are available and seem prudent. You are also receiving a recommendation to conduct a BHBF in the November-December period, along with extending the mechanical removal of non-native fish and fluctuating non-native fish suppression flows (possibly into April), which could prove to have similar cost-saving benefits for the Basin Fund without sacrificing necessary experiments and expected benefits to resources in the Canyon. Fluctuating non-native fish suppression flows are less of a cost to the Basin Fund than ROD flows, and conducting a BHBF in November-December rather than January would reduce the cost to the Basin Fund of continuing low flows during that late fall/early winter period once the sediment trigger had been met.

5. *Counteract other sediment losses.* Since the AMWG is recommending that you continue fluctuating non-native fish suppression flows regardless of your decision on a BHBF, due to the desire to see if we can produce a more detectable signal in terms of benefit to humpback chub from this action, it would be wise to try to counteract the loss of sediment, particularly in Marble Canyon, from this experimental action. GCMRC has documented a decline in the mass balance sediment budget in this section during the fluctuating non-native fish suppression flows, which is troubling given that we currently have a negative mass balance sand budget throughout the system. If you do not conduct a sediment conservation experiment this year if we have a trigger, we lose the opportunity to turn that situation around.

6. *Do public outreach.* The AMP has now established a public outreach program and is positioned to educate the public about our actions that may not be otherwise understood by the

media and the public, such as conducting a BHBF in drought conditions. Our public outreach arm could work with your public affairs office to educate the public in support of your decision to continue actions and experiments designed to benefit the resources of the Grand Canyon.

We encourage you to recognize the concerns that underlie the votes to recommend that you not conduct a BHBF in WY 2005, but reject that as a recommendation, and instead accept the wiser recommendation to move the BHBF to the November-December time frame if a sediment trigger occurs. Your Interior agencies were split on the "no BHBF" vote, which barely registered a two-thirds majority, but they were all in agreement on doing a fall BHBF, as essentially was the AMWG, which passed that motion with no dissent and only one abstention. We believe that the true recommendation is the one that received overwhelming support, and we ask you to proceed accordingly.

Sincerely,

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Grand Canyon Wildlands Council

Darryl Beckman
AMWG Member
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