

From: Linda Whetton
To: Begay, Steven; Broscheid, Bob; Bulletts, Charley; Gold, Rick; Groseclose, Jay; Jackson Kelly, Loretta; James, Leslie; Kuwanwisiwma, Leigh; Lehr, Phillip; Martin, Steve; Potochnik, Andre; Rampton, Ted; Ramsey, Nikolai; Sabo, David; Seaholm, Randolph; Shields, John; Spiller, Sam; Steffen, Mark; Stevens, Larry; Strong, Dennis; Warren, Brad; Werner, Bill; Zimmerman, Gerald
Date: 8/16/2007 9:38:14 AM
Subject: AMWG Proposed Budget and MRP Changes

In response to my e-mail message dated July 31 requesting any additional proposed changes to the FY08 hydrograph, budget, or workplan, be sent to Mary Orton or myself by August 15, Mary asked me to forward the following information and attachments to you. The documents will be posted to the website later this morning and copies provided at the meeting.

From: "Mary Orton" <mary@maryorton.com>
To: "Linda Whetton" <LWHETTON@uc.usbr.gov>
Date: 8/15/2007 7:04:27 PM
Subject: Message to AMWG

Many thanks to all of you who have reviewed the proposed FY08 budget-workplan-hydrograph, and the latest draft Monitoring and Research Plan (MRP), and responded to the Secretary's Designee's request to send in any suggested changes by COB yesterday.

Attached please find two short documents that include proposed changes, as follows:

1. A proposed change in the hydrograph from Nikolai Ramsey of Grand Canyon Trust <Ramsey hydrograph FY08.doc>.
2. Proposed changes to the MRP from Leslie James from CREDA <James MRP.doc>

In addition, Leslie asked that her comments on the BHBF Science Plan Update be made available to you. These are in the attached file <James BHBF Science Plan.doc>.

cc: Amy Heuslein / Garry Cantley (via fax @ 602-379-3833)

CC: Alberts, Jason; Alpine, Andrea; Balsom, Janet; Barger, Mary; Barrett, Clifford; Beard, Chris; Burman, Brenda; Christensen, Kerry; Conrad, Tara; Damp, Jonathan; Davis, William E.; Dongoske, Kurt; Fairley, Helen; Garrett, L. David; Hamburg, Stacey; Hamill, John; Hamilton, Lynn; Harris, Christopher; Henderson, Norm; Hower, Jonne; Johnson, Rick; Kelleher, Jayne; King, Robert; Kite, John; Knowles, Glen W.; Kubly, Dennis; Lyons, Christian; mandersen@usgs.gov; McMullen, Ken; Melis, Ted; nbryant@usgs.gov; O'Brien, John; O'Brien, John; Orton, Mary; Ostler, Don; Palmer, S. Clayton; Patno, Heather; Persons, Bill; Peterson, Randall; Ryan, Tom; Schoblom, Sara; Seaholm, Randy; Skrzynski, LeAnn; smankiller; Steffen, Tim; Yeatts, Michael

Grand Canyon Trust – 2008 Hydrograph

The Grand Canyon Trust disagrees with the TWG recommendation to implement Modified Low Fluctuating Flows (MLFF) in Water Year 2008. Instead, we recommend testing Seasonally-Adjusted Steady Flows (SASF) beginning in WY 2008 as required by the 1994 Biological Opinion on the operation of Glen Canyon Dam.

Reclamation is required to test the efficacy of SASF for removing jeopardy to humpback chub. The Biological Opinion found that the selected alternative in the 1996 Record of Decision (*i.e.*, MLFF) is, "likely to jeopardize the continued existence of the humpback chub and razorback sucker and is likely to destroy or adversely modify designated critical habitat."

Element 1 of the Reasonable and Prudent Alternative (RPA) states, "Attainment of riverine conditions that support all life stages of endangered and native fish species is essential to the Colorado River ecosystem." Element 1A requires that, "A program of experimental flows will be carried out to include high steady flows in the spring and low steady flows in summer and fall during low water years (releases of approximately 8.23 maf) to verify an effective flow regime and to quantify, to the extent possible, effects on endangered and native fish. Studies of high steady flows in the spring may include studies of habitat building and habitat maintenance flows. Research design and hypotheses to be tested will be based on a flow pattern that resembles the natural hydrograph, as described for those seasons in the SASF." Although 8.23 maf annual releases have happened for seven consecutive years (2001-2007), Reclamation continues to violate this provision of the RPA by not testing SASF.

Since 2002, Reclamation has been required to implement an SASF hydrograph every year with an 8.23 maf annual release. The RPA states, "If the Service believes there is not sufficient progress, Glen Canyon Dam would be operated as SASF flows during spring through fall (April to October)..." Although the Service determined in 2002 that sufficient progress was not being made, Reclamation continues to violate this provision of the RPA by not implementing SASF.

The 1995 EIS (USBR 1995) provides a hydrograph consistent with the requirements of the RPA (see Figure 1). In addition, a hydrograph (Valdez and others 2000) and a detailed science plan (Fritzing and others 2000) were developed for the 2000 Low Summer Steady Flow (LSSF) experiment. An updated hydrograph and science plan should be completed to reflect the most current scientific information regarding the effects of dam releases on humpback chub and its critical habitat.

The Trust does not believe there is a legitimate reason to further delay the testing of SASF. Some may argue that testing SASF should be delayed because the Long-Term Experimental Plan EIS (LTEP) is currently under development. However, the requirements of the 1994 RPA are in force until reconsultation occurs. Furthermore, several years may elapse before a Record of Decision is signed on the LTEP, and the results of the SASF would be valuable information for the Secretary to make an informed choice among the alternatives.

It is likely that WY2008 will be yet another 8.23 maf release year. We expect that the legal requirement to test SASF will not be ignored.

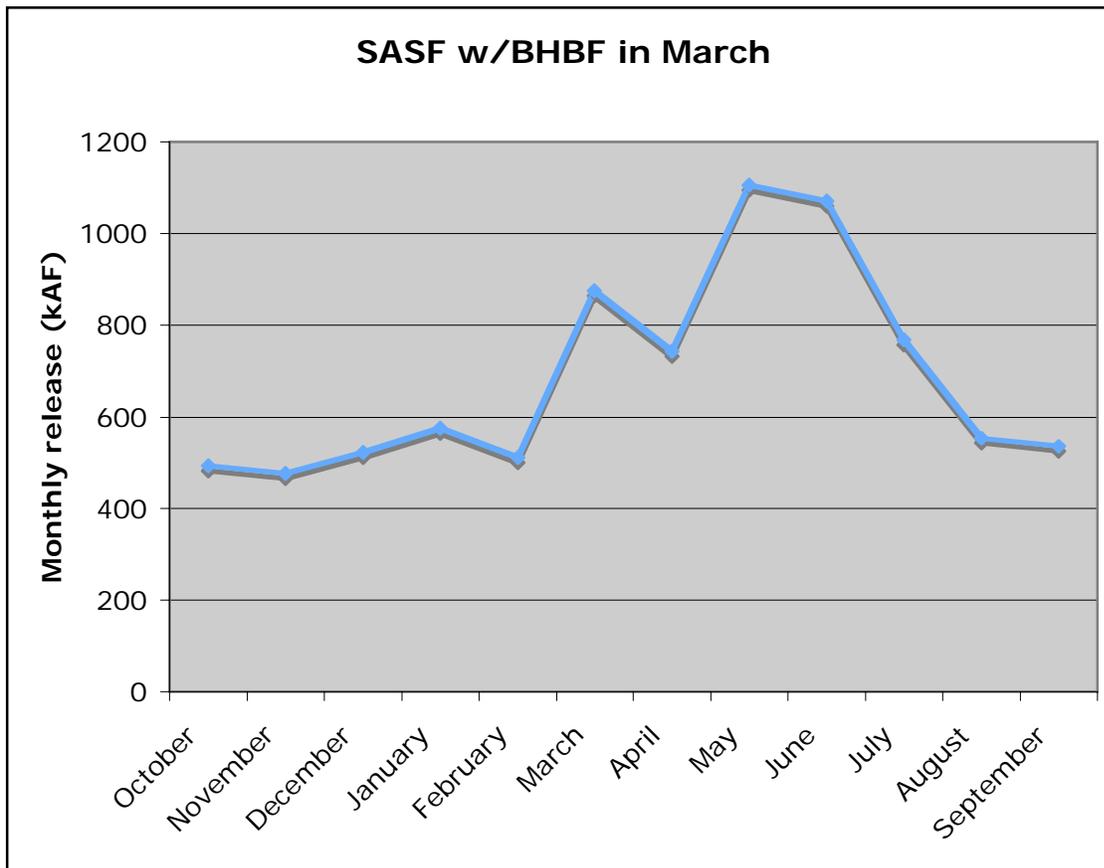


Figure 1. Monthly volumes from 1995 EIS. 200 kAF of water moved from January and February to accommodate a BHBF in March.

Literature cited

Fritzing, C. and others. 2000. A science plan for WY 2000 Low Summer Steady Flows. Report dated 27 March 2000. 71 pages.

USBR. 1995. Operation of Glen Canyon Dam. Final Environmental Impact Statement. 337 + attachments pages.

Valdez, R. A. and others. 2000. A program of experimental flows for endangered and native fishes of the Colorado River in Grand Canyon. Report dated 31 December 2000. 56 pages.

COMMENTS ON THE MONITORING AND RESEARCH PLAN FROM LESLIE JAMES OF CREDA:

Although the instructions say that we can comment ONLY on changed language, I request that when this report is updated, the following changes/corrections be made:

- a) Page 9: "In the FY '07-2011 period, GCMRC anticipates two additional BHBF tests." This should be removed based on ongoing work on the BHBF and the LTEP.
- b) Page 52: The section on replication of the 2004 BHBF does not appear to be consistent with the most recent draft of the BHBF Science Plan and ongoing comments thereon.

COMMENTS ON THE BHBFB SCIENCE PLAN FROM LESLIE JAMES OF CREDA:

- a) Page 8, Issue 8: This section indicates that trade-off analysis should be done regarding “potential resource benefits AND SOCIETAL VALUE derived from conducting the experiment.” I don’t believe there has been any societal value assessed and this reference should be removed.
- b) Table A.1: This table intends to lay out pros and cons associated with a BHBFB. Throughout the table, however, the term “probable” is included as a “pro.” We have commented in the past on GCMRC work products that speculative results/hypotheses should be clearly identified as just that – not as “fact” – and would recommend the “probable” statements be moved into the “Uncertain” category.
- c) A question: Why is “shifts emphasis from solely monitoring to EXP research learning activities in a given year” a “pro”?
- d) Another question: Why “Already have abundant data on export of sand under MLFF, hence little new learning would occur” a “con”? The program should emphasize resource enhancement and if learning occurs, fine, but it should not be the primary purpose.
- e) Table A.2: Why isn’t hydropower listed as an “other priority issue”? It certainly is listed in the motion by the AMWG to forward LTEP alternatives options to the Secretary.
- f) Table A.3: “Potentially” is listed as a “con” – see comment above – it should be an unknown if that is what it is.
- g) Page 14, 2nd comment: It seems a logical step would be for the AMWG to address the policy issues PRIOR to finalization of the BHBFB Science Plan, as opposed to policy issues being addressed “after which GCMRC will modify the science plan according to these policy directions.” I would therefore request the AMWG include in its discussions “next steps” regarding addressing these policy issues.