



16 April 2008

Secretary Dirk Kempthorne  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

**RE: Protecting Sandbars Built with March 2008 High Flow Test**

Dear Secretary Kempthorne:

As members of the Glen Canyon Dam Adaptive Management Program (AMP), we are writing to provide you with a recommendation regarding the operations of Glen Canyon Dam that are needed to protect park resources in Grand Canyon National Park and Glen Canyon National Recreation Area. Although it is unusual to provide you with a recommendation that has not first been vetted through the AMP, the Bureau of Reclamation did not bring this issue to the attention of the AMP with sufficient time for discussion, and it now requires immediate attention.

In the 2008 Annual Operating Plan (AOP), the total annual releases for water year 2008 (October 2007 to September 2008) was expected to be 8.23 million acre-feet. However, the recent April forecast for inflow to Lake Powell is higher than what was expected when the AOP was developed, and equalization releases per the 2007 Interim Guidelines are now being implemented. Based on the current 24-month study, Reclamation is planning to release an additional 653,000 acre-feet between now and the end of the water year.

The monthly volumes prescribed in the 24-month study include releases of 840,000 acre-feet in July and August. These releases could result in **damaging** high fluctuating flows. The 1996 Record of Decision for the Operation of Glen Canyon Dam allow daily fluctuations up to 8000 cfs per day under a monthly release volume in excess of 800,000 acre-feet, and 6000 cfs with releases between 600,000 and 800,000 acre-feet.

The projected high fluctuating releases in July and August would be very erosive, and are likely to eliminate or significantly degrade the sandbar building that occurred during the March 2008 High Flow Test. Along with this loss of sediment is the likely loss or degradation of backwaters that are the subject of a large and expensive research effort to investigate the importance of these habitats to humpback chub and other native fish. In addition, the loss of sediment on the beaches will reduce the protection afforded to archaeological sites through aeolian transport.

We are not concerned with the annual release volume from Glen Canyon Dam. It is clear from the Grand Canyon Protection Act that the dam must be operated to meet annual water delivery obligations between the upper and lower basins. However, the Act and the committee reports are clear that, within the

constraints of meeting annual delivery obligations, the dam must be operated to protect park resources. On the floor of the Senate in October 1992, Senator McCain stated,

*“Ten years ago, the Department of the Interior reported that operations at Glen Canyon Dam were damaging resources within the Grand Canyon. The erratic release of water from the dam to meet peak electric power demands had destroyed Colorado River beaches, and harmed other natural, cultural, and recreational resources. Somewhere along the line we forgot our obligation to the canyon and to the future generations for whom we hold it in trust. In response, I introduced the Grand Canyon Protection Act to reorder those priorities--to stop the damage and legally require the dam to be operated in a manner which will protect park resources. That was 2 1/2 years ago. It's been a long haul. The fight has not always been easy. But, the stakes are high and the cause is right.”*

We respectfully request that protecting park resources be elevated to the prominent position expected by the American public for our National Parks and envisioned by Senator McCain and the others who championed and supported the Grand Canyon Protection Act.

On 5 March 2008, we were at Glen Canyon Dam to hear you proclaim,

*“Today, we are here to set the river free once again. And through this experiment we hope to enhance the habitat in the canyon and its wildlife, and learn more about these complex natural systems.”*

Unfortunately, the high fluctuating flows that are now prescribed for the remainder of this water year will likely nullify your goals for the flood release. Not only will the habitat enhancement not occur, but about all we'll learn is what we already know—high flows can be used to rebuild beaches, high fluctuating flows quickly eliminate the gains, and the resources in Grand Canyon will continue to decline. Steve Martin, the Superintendent of Grand Canyon National Park has it right that the flows proposed in the 2008 Environmental Assessment will impair, rather than improve, park resources.

We request a timely discussion of alternative monthly release patterns within the AMP and a revised decision on monthly releases that will both meet the annual water delivery obligations and protect park resources. We suggest that one likely option to conserve the newly built sandbars under equalization is to discharge stable daily flows under equal monthly volumes for the remaining months in the water year.

Sincerely,

Nikolai Lash  
Adaptive Management Work Group representative  
Grand Canyon Trust

Rick Johnson  
Technical Work Group representative  
Grand Canyon Trust

CC: Brenda Burman, John Hamill, Steve Martin, Randy Peterson, Dave Sabo, Lynn Scarlett, Steve Spangle, Larry Walkoviak