



TO: Glen Canyon Dam Adaptive Management Work Group
FROM: John McClow, Colorado AMWG representative
DATE: September 12, 2017
RE: Colorado's comments on final draft of GCDAMP Triennial Work Plan

Colorado appreciates the opportunity to submit the following comments regarding the Glen Canyon Dam Adaptive Management Program (GCDAMP) Triennial Work Plan (TWP) and Budget for the consideration of the Glen Canyon Dam Adaptive Management Workgroup (AMWG). Colorado's Technical Work Group (TWG) representative abstained from voting to recommend the TWP to the AMWG because of the concerns articulated below.

Colorado's core concern regarding several of the projects in the TWP is a matter of the direction of the Grand Canyon Protection Act (GCPA) regarding non-flow actions. Colorado expressed that concern in a November 14, 2016 comment letter on the Final Environmental Impact Statement (FEIS) for the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP):

The GCPA is specific to developing criteria and operating plans for dam operations consistent with key provisions of the Law of the River to help protect, mitigate impacts to, and improve resources in the Grand Canyon National Park and Glen Canyon National Recreation Area. (GCPA, Section 1804). For activities not related to flow change and dam operations, the GCPA directs the Secretary of the Interior to exercise other authorities consistent with Section 1802(b). The FEIS does not clearly identify this distinction when describing potential resource considerations and activities under the LTEMP. Colorado understands and emphasizes that the Secretary of the Interior must rely on authorities and funding sources other than the GCPA to address resource considerations such as vegetative management, promotion of aeolian sand deposits to protect cultural and historic properties, and socioeconomic values to the extent they are not related to dam operations and flow activities.

With this perspective, Colorado encourages the Bureau of Reclamation and the Grand Canyon Monitoring and Research Center (GCMRC) to identify alternative funding sources for the following projects.

- **GCMRC Project C: Riparian Vegetation Monitoring and Research** – It has been—and continues to be—Colorado's position that mitigation of actions should be through flow activities to demonstrate that the impacts to be mitigated stem from the flow actions at issue under the GCPA. However, setting aside the matter of flow vs. non-flow activities, there is no

demonstration that the activities contemplated address the limited scope of mitigating dam operations as opposed to the existence of the dam itself.

Project Element C.4 (cross-listed in Appendix 2b as C.5) proposes development of a vegetation management decision support system. This would be developed with Upper Colorado River Basin Fund (Basin Fund) monies to support vegetation treatment actions which the LTEMP ROD specifies should be implemented by the National Park Service. Colorado believes that this decision support tool should be supported by outside funding, as is the vegetation treatment actions it will inform.

- **GCMRC Project D: Geomorphic Effects of Dam Operations and Vegetation Management for Dunefields, Terraces, and Archaeological Sites** – Colorado concurs with TWG’s recommendation to eliminate funding for elements D.1, D.2, and D.3. Colorado also notes that aeolian processes depend on sand transport from sandbars, and that research is supported in other portions of the TWP.
- **GCMRC Project F: Aquatic Invertebrate Ecology** – Project F.3 supports research on bird and bat competition for aquatic prey. This research is not related to dam operations and flow activities, thus it is an inappropriate use of the Basin Fund. Colorado believes that the GCMRC should look to other funding sources.

Colorado acknowledges that the GCMRC, and thus the Secretary, have difficult decisions to make due to limited funding, staffing considerations, and competing directives and demands for research and resources. Still, Colorado encourages a thorough examination of the appropriate use of Basin Fund power revenues. We believe that Basin Fund monies which become available through reallocation of resources in the TWP should be devoted first to project elements that benefit efforts to recover the Humpback Chub.