

From: Dennis Kubly
To: Barger, Mary; Dongoske, Kurt; Greiner, Lloyd; Henderson, Norm; Johnson, Rick; Kincaid, Chris; Knowles, Glen; McMullen, Ken; Ostler, Don; Persons, Bill; Steven Begay; Stevens, Larry
Date: Mon, Jun 6, 2005 10:53 AM
Subject: Fwd: Revised Draft FY 2006 Budgets (EXP vs NONEXP), Responses to Questions/Comments from BAHG and Cover Me

BAHG,

Please find attached budget spreadsheets for the proposed GCDAMP nonexperimental and experimental FY06 budgets, comments/responses from GCMRC, and a cover letter from Ted Melis, Acting Chief of GCMRC, explaining changes made since the TWG last saw the budget along with reasons for those changes. We intend to send these out to the full TWG this Friday, June 10, along with workplans, but I wanted to give you the opportunity to review first. The nonexperimental and experimental budgets contained in these spreadsheets are the result of extensive discussions between GCMRC and BAHG. I think those BAHG members who were able to participate in these discussions are willing to recommend these budgets to the TWG, but I recognize that not all BAHG members were able to participate. If you are a BAHG member who has not been able to participate, please review these spreadsheets and provide me with any major issues that you discover with the proposed budgets. Minor differences of opinion can be addressed at the TWG meeting. I will need your comments and questions by close of business Wednesday, June 8. Sorry for the fast turnaround.

Dennis,

The following are my concerns regarding the revised draft fy 2006 budgets and work plan. My concerns, in part, reflect the discussion that occurred during the BAHG teleconference on 31 May 2005. I have identified three issues for concern and trust that these issues will be mentioned during the BAHG's presentation before the TWG in two weeks and will also be incorporated into the TWG mailing.

1) Integrated archaeological site monitoring - this program is the development of the GCMRC's archaeological site monitoring that will occur over the next 4 years. It proposes to evaluate site condition, rates of erosion at sites, and linkages between a site's deteriorating condition and dam operations. My concerns here are multi-fold. First, the Center's conceptualized monitoring program for archaeological sites appears to be more extensive than is necessary. That is, currently the BOR is developing a treatment plan for the 160 archaeological sites that are located between Lees Ferry and Diamond Creek. These 160 sites are ones that are situated between the river and a 97,000 cfs lateral flow extent and represent those sites that have the highest potential to be most affected by dam operations. The evaluation of the National Register significance of these sites, their current condition regarding integrity, and the necessary treatment, ranging from preservation techniques to data recovery, will be implemented and completed within the next 5 years. Once this is completed the need to monitor these sites and the number of sites to monitor will be greatly reduced. Therefore, the need for a archaeological site monitoring program as outlined in the FY06 work plan may be more extensive than necessary.

Secondly, it is questionable whether archaeological site monitoring above a 97,000 cfs flow level is within the purview of the Adaptive Management Program because it is doubtful that dam operations have much to do with the preservation or erosion of those sites. Moreover, the lateral extent for the other resources covered by this program do not generally extend above a 100,000 cfs. I am also disinclined to support the funding of weather stations to detect how much wind and rain play a part of archaeological site erosion or stabilization because they are processes that are beyond the influence of this program.

I do support a continued archaeological site monitoring program but one that is continually reduced each year as a result of the implementation of the treatment program. The monitoring program should be one that is cooperatively designed between the NPS and GCMRC, with NPS performing the monitoring. I am however against subjecting and locking the AMP into the currently proposed archaeological site

monitoring program for a period of 4 years at the tune of \$375,000/year to only evaluate its effectiveness after the 4 year period. To paraphrase Jeff Lovich, this is the Christmas tree of archaeological site monitoring and not the appropriate one for this program.

2) Integrated Tribal Values Monitoring Project - Similar to the archaeological site monitoring this project is conceptual at best. The description of this project does not define how the tribal monitoring efforts will be incorporated into the GCMRC's monitoring efforts. Similarly, it also indicates that "experts" from NAU will be involved in developing the tribal monitoring programs. What is unclear is how much of the funding for this project is going to the NAU "experts" and how much is being provided to the individual tribes to develop their own effective and credible monitoring programs. It is also unclear if the individual tribes were consulted about the development of this project and whether they are providing current support. Without full tribal support for this program the likelihood of the AMP receiving a useful product is marginal. Additionally, if the entire amount allocated for this project is ultimately used to fund the NAU participation then, I fear, that the monitoring component will end up being a theoretical statement and not much of a product that is useful for the tribes. The Center has allotted \$250,000.00 for this project, one wonders how they arrived at this figure, were the tribes involved in determining this amount, and how will this amount be allocated between NAU and the tribes? Also, earlier this year the Center asked the tribes to present tribal monitoring program proposals before the TWG. What is the status of those proposals and how do these proposals articulate with this project?

3) The Grand Canyon National Park is requesting \$100,000.00/year to cover their personnel position (FTE) that reviews and grants research permits. The NPS believes, based on their presentation at the last AMWG meeting, that they have AMWG concurrence for this request based on the lack of voiced AMWG objection. I am not sure that I would interpret the AMWG silence for concurrence, rather I think this is an issue that should be directly presented before the AMWG for a recommendation.

The NPS claims that they receive about 150 permit request each year and that approximately 41% are related to GCMRC projects and that this justifies their request. I am in agreement with other stakeholders who have voiced their position that the AMP should only fund the time of the NPS personnel that is directly related to reviewing those permit requests that are associated with the GCMRC. At one level it seems to me that the NPS is asking the AMP to fund an inherent responsibility of a federal land manager which is to review permit requests. As stated during the teleconference call, it would seem appropriate for the NPS to internally cover this cost, given the millions of dollars of specific and useful resource science information they receive from the AMP each year.

Thank you for the opportunity to express my concerns. If there is anything in my comments that is unclear please don't hesitate to contact me for clarification.

Kurt Dongoske
Cultural Resource Representative
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