

Brenda Burman, Secretary's Designee
Glen Canyon Dam Adaptive Management Program
Department of the Interior, MS-6640 MIB
1849 C Street NW
Washington DC 20240

July 16, 2008

RE: Technical Work Group Minority Report regarding FY09 Budget line item, BIO 2.R16.09 "Mainstem Coldwater Fish Control - New Initiative".

Dear Ms. Burman,

This report is on behalf of Anglers and Angling Interests who oppose a "New Initiative" at this time to kill coldwater sport fish (Trout) in the Grand Canyon.

This report is not intended to indiscriminately or generally disparage the intentions or the motivations of GCDAMP stakeholders, USGS scientists, private contracting collaborating scientists, NPS bureaucrats, Reclamation bureaucrats or others who support government projects killing trout in the Grand Canyon.

This report is a list of reasons for opposition to the new initiative and includes observations, concerns, trout killing consequences (intended and unintended), precedent consequences, NEPA inadequacies, all related to the new initiative and to the similar experiment of killing trout in 2003-2006.

- 1- The "New Initiative" is falsely labeled as "Cold Water Fish Control". The only goals listed are to "Calculate the abundance of Rainbow Trout" and to "Reduce the abundance of Rainbow Trout" "in the mainstem Colorado River in the reach of the confluence of the Little Colorado River". This project as written in the budget and the workplan is blatantly discriminatory against trout even though in implementation other non-native fish will be killed as they were also killed in the similar project during 2003-2006. If this new project was a straight forward general project to eliminate ALL non-native fish in a limited area designated for native fish, this project would be less offensive.
- 2- Anglers and the general public were told that the original trout killing project from 2003-2006 would be done for four years and then stopped for four years for analysis. This was a promise now broken.
- 3- The original trout killing was initiated primarily due to a lot of false information, inaccurate science and hyperbole generated by various government agencies and spread by environmental groups including false statements that humpback chubs had declined to as low as 1,000 individuals in the Grand Canyon (USGS data) when the chubs likely were stable at 4 or 5,000. Also it was stated falsely by USGS that chubs had

declined from over 15,000 in the 1980s when actually they were less than 10,000 in the 1980s (FWS data, Czaplá). The number of trout in the Grand Canyon was grossly overstated by USGS to be "Over a Million", a number spread nation wide by the Grand Canyon Trust in newspaper articles. The USGS predicted that there were 70,000 trout in the ten mile area of the Colorado River where they planned to kill them. Even with a stated killing efficiency of 90%, USGS only killed 20,000 trout in four years and 24 trout killing trips. Less than 1% of Rainbow Trout stomachs contained fish (mostly not chubs) even though scientists had predicted since 1995 or earlier that trout "consumed over 500,000 young chubs per year" (Rich Valdez). If chubs actually did decline since the 1980s, there are many possible explanations including the 1990-91 experimental flows for sediment studies that repeatedly destroyed the aquatic plants and insects that chubs and trout rely upon. Trout populations and the Marble Canyon/Lees Ferry area economy declined catastrophically in 1991. The government Trout killing has resulted in Trout becoming a fall guy for bureaucrats to use to "do something" and also a fund raising/law suit opportunity for environmental groups.

- 4- The NEPA compliance for the "New Initiative" was grossly inadequate and was buried as a part of the compliance done for the recent High Flow Test and included only a 15 day public comment period. Recent fish monitoring literature cited in the High Flow Test EA and BA has not been made available even when requested from Reclamation and USGS.
- 5- The precedent created by killing trout in the Colorado River around the confluence with the Little Colorado River has led to NPS and Reclamation proposals to kill trout elsewhere including Bright Angel Creek and other creeks that are too cold for chubs. They have presented no evidence that trout from those areas migrate to the Little Colorado River area.
- 6- Chubs are a warm water fish living mainly in the spring fed warm water of the Little Colorado River. Trout do not enter the Little Colorado River. Killing trout will open a niche that could become occupied by fish such as carp, catfish, bass and others that would enter the Little Colorado River, competing and preying on chubs in their warm water home.
- 7- Killing trout around the Little Colorado River led to the presumably unforeseen consequence of several environmental groups threatening to sue the Arizona Game Fish if they stocked any trout to support the Lees Ferry Trout Fishery. The FWS and the NPS have also created impediments to Arizona Game and Fish management of the Lees Ferry Trout Fishery.

Sincerely,

Mark Steffen, Federation of Fly Fishers, AMWG/TWG recreation stakeholder,
Glen Canyon Dam Adaptive Management Program