October 13, 2016

Dr. Katrina Grantz, Chief,
Adaptive Management Group
Environmental Resources Division
Upper Colorado Region Bureau of Reclamation
125 South State Street, Salt Lake City, UT 84138

Subject: Fall 206 High flow experiment, Glen Canyon Dam

Dear Katrina:

It appears the sediment requirements have been met this year for a fall high flow experiment (HFE). Sediment availability is the principal determinant in the feasibility of conducting a high flow experiment under the Development and Implementation of a Protocol for High-Flow Experimental Releases from Glen Canyon Dam, Arizona, 2011 through 2020 Environmental Assessment. The HFE Protocol is experimental in nature and is designed to achieve a better understanding of whether, how, and when to incorporate high releases into future dam operations in a manner that effectively conserves natural resources that are intimately connected to fine-sediment deposits.

In considering a HFE, the Department of the Interior Glen Canyon Leadership Team (Team) for the HFE Protocol and Non-Native Fish Control is tasked to also consider a number of key biological resource effects including aquatic food base, native and nonnative fish abundance including the Lees Ferry trout population, and the trout fishery recreation experience quality.

In considering a HFE this fall, the Team needs to fully consider that the Lee's Ferry trout fishery continues to struggle with poor angler catch rates which are impacting local businesses and angler satisfaction. We believe that it is premature to conduct another fall HFE until the following uncertainties and unresolved issues are addressed:

(1) the impact of sequential HFEs on the character, composition, and quantity of the aquatic food base. An evaluation of these questions by GCMRC based current research has been requested and anticipated to be available for the January TWG/GCMRC Annual Science Reporting Meeting;

(2) the decline in the condition of the Lee's Ferry trout fishery coincidental with the implementation of the HFE Protocol and changes subsequent to the 2015 HFE hiatus in improvements, if any, to the fishery and food base conditions;

(3) the yet to be finished and presented comprehensive written three year review of the impacts of the first three sequential fall HFEs. This report was due in 2015 and remains as of this date in an unavailable draft form; and

(4) the presence of green sunfish in the Lees Ferry reach, which caused the cancellation of a 2015 fall HFE, has reappeared. Efforts are underway for control through mechanical and possible ammonia related treatments but have as of this date not provided a level of assurance of mitigation of threats to downstream native fish.

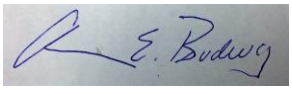
We appreciate the opportunity to provide these comments and concerns and request that they be shared with the members of the Team.

Sincerely,

Sincerely,

John Jordan
AMWG Representative

John Hamill
AMWG alternate



Chris Budwig
TWG Representative

Joe Miller
TWG alternate

cc Technical Work Group and interested parties