

January 4th 2004

To: Sara White, Environmental Compliance Officer, Grand Canyon National Park
sara_white@nps.gov P.O. Box 129 Grand Canyon, AZ 86023
Re: D18 (GRCA 8211) Bright Angel Creek Trout reduction Project
From: Mark Steffen, Glen Canyon Dam Adaptive Management Work Group Member
Representing: The Federation of Flyfishers and The Northern Arizona Flycasters

I strongly oppose the National Park Service plan to kill trout in Bright Angel Creek. I have fished for trout in Bright Angel Creek since 1988. I would very much appreciate your attention and consideration and response to the following questions, comments and suggestions.

- Fishermen have witnessed Park Rangers trap and remove Native Beavers and dismantle Beaver Dams, in Bright Angel Creek. How has the removal of Beavers and Beaver Ponds, from Bright Angel Creek effected fish habitat?

- Did Native Flannel Mouth Suckers utilize the Beaver Ponds during the spring and summer as calm, warm water refuge areas?

- Did Native Flannel Mouth suckers eat trout eggs and trout fry in Bright Angel Creek?

- Did the removal of Beaver Dams from Bright Angel Creek make the creek's fish habitat more vulnerable to damage from winter and spring snow melt floods?

- Did the Park comply with NEPA before removing Beavers from Bright Angel Creek?

- Does the removal of water from Bright Angel Creek for human use throughout the Park have an impact on fish habitat?

- How much water IS removed from Bright Angel Creek for human use? How has this amount of water varied seasonally and over the last few decades?

- According to the Park Scoping Letter there are "Large Numbers" of the COMMON, not threatened, not endangered, Speckled Dace in Grand Canyon creeks, except for Bright Angel Creek. Why is it so important to have more Speckled Dace in Bright Angel Creek, at the expense of a trout fishery utilized by Park visitors for over 75 years?

- Sport fishing groups are supporting the Grand Canyon Monitoring and Research Center's current four year project, that has killed 11,500 trout in the first year, in 17 miles of the Colorado River surrounding the mouth of the Little Colorado River. The Little Colorado River provides the only water in the Grand Canyon warm enough for the Endangered Species Humpback Chub to live and reproduce. Why is this project NOT an adequate amount of trout killing to protect the Humpback Chub?

- How were Native fish in the Grand Canyon effected by the EIS experimental flows of 1990 and 1991 which destroyed the aquatic food base of the river and starved to death up to 80% of the trout at Lees Ferry and in the Grand Canyon?

- How have all fish in Grand Canyon been effected by continuing experimental flows which have prevented the recovery of the aquatic food base to pre-1990 conditions?

I would like the Park to consider the following alternatives to destruction of the Bright Angel Creek Trout Fishery:

1: The Grand Canyon Monitoring and Research Center trout killing project is adequate to protect the Humpback Chub.

2: Re-introduce Beavers to Bright Angel Creek to restore fish habitat.

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3: Stop removing water from Bright Angel Creek for human use.

4: Use a weir at Bright Angel Creek to tag some spawning run trout. Track these tagged fish to see if they migrate to the area of the Grand Canyon where the Humpback Chub live. The Grand Canyon Monitoring Research Center would then kill these fish and knowledge could be gained about fish movement in the Grand Canyon.

5: Concentrate and increase efforts to kill Non-native fish, including Carp, catfish and bullheads, in the Little Colorado River, which is the ONLY currently suitable warm water habitat for the warm water Humpback Chub. New methods need to be developed to kill the very hard to catch Carp.

6: Consider that when the Temperature Control Device on Glen Canyon Dam becomes operable, Trout and Chubs will co-exist if the water is warm enough for both. Evidence shows that Chubs will outcompete Trout when conditions are suitable for both. Chubs are much better adapted than Trout for locating food in muddy water. The Colorado River below the Little Colorado River is very often muddy.

7: The Park should immediately remove and raise at least some of the Endangered Species Humpback Chubs in a warm water refuge, at least until the Temperature Control Device becomes operable and the river becomes more hospitable to warm water fish. Also, the warmer water may bring much more dangerous predators from Lake Mead, such as Stripped Bass and Smallmouth Bass which could quickly decimate the Chubs, increasing the need for a safe refuge somewhere for the Humpback Chub.

Please show some restraint and consider many other actions before destroying the Bright Angel Creek Fishery, which has been enjoyed tremendously by Park visitors for over 75 years.

Thank you for your consideration of these questions, comments, and alternatives.

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