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Mr. Dennis Kubly & Mr. Glen Knowles  
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Re: Comments by Living Rivers and Center for Biological Diversity for Revised Environmental Assessment of High Flow Experiment Protocol and Non-Native Fish Control.

Dear Dennis & Glen,

The Grand Canyon Protection Act (GCPA) was passed in 1992 and states the values of the national park will be improved. The revised EA released on July 5, 2011 admits that the most that can be achieved at the end of the experimental plan, under normal hydrologic conditions, is an overall sediment gain of 92,000 metric tons. Of course, more than 92,000 metric tons of sediment has already been lost from the ecosystem since 1992, and so the existing imbalance will not be properly addressed by the proposed protocol. To honor the GCPA at the minimum level, a gain of about 3 to 4 million metric tons by 2020 is actually what is required to demonstrate an improvement to the ecosystem values in the national park.

We understand the current high releases from Glen Canyon Dam, to comply with the Interim Guidelines of 2007, will export 4.3 million metric tons<sup>1</sup> of sediment from the river riparian ecosystem by the end of water year 2011. It is reasonable to conclude that this rate of export will continue through water year 2012, according to the projected monthly releases of the most recent 24-month study.<sup>2</sup>

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<sup>1</sup> <http://www.riversimulator.org/Resources/GCDAMP/AMP1999toPresent/TWG/2011/TWG2011June/GramsSedimentJune2011.pdf>

<sup>2</sup> <http://www.usbr.gov/uc/water/crsp/studies/index.html>

This high rate of sediment export that is occurring on the eve of initiating the proposed protocol, makes success all the more unlikely to occur at the conclusion of the experiment in 2020.

As we stated in our comments of March 2011, a more aggressive strategy is required to satisfy the mandates of the GCPA. We insist that the new information provided since March further strengthens our argument. We again ask that the protocol be completely abandoned. A new strategy should be implemented that will eventually demonstrate real ecosystem improvements to be accomplished in much smaller time-frames. In March we suggested the study and implementation of alternative strategies, namely selective withdrawal, seasonally adjusted steady flows, mechanical sediment augmentation and dam decommissioning.

Equalizing and balancing flows are currently causing harm to the Grand Canyon ecosystem. It is obvious that the Interim Guidelines of 2007 defeats the purpose of the Grand Canyon Protection Act. When one component of the Law of the River defeats another component of river law, then it is reasonable to conclude that the desired stability of values in this national park cannot be achieved in the next decade, let alone improved.

We are also concerned about how these higher volume monthly releases and cooler water temperatures are likely to impact the food web, sandbar habitat, and the productivity of humpback chub populations. Monitoring the conditions of humpback chub recruitment and their critical habitat in the next 18 months must be robust and transparent.

If harm to these species is demonstrated, then we insist there will be a need to begin a reconsultation of dam operations according to Interim Guidelines. It is indeed unfortunate that a temperature control device at Glen Canyon Dam and a sediment augmentation scheme was not implemented long before the signing of the 2007 ROD for Interim Guidelines. Had this occurred, the ecosystem impacts of Interim Guidelines would likely not be as severe.

Sincerely yours,

John Weisheit  
Conservation Director  
Living Rivers

Taylor Mckinnon  
Public Lands Campaigns Director  
Center for Biological Diversity