

January 31, 2012

Submitted via electronic form at:

<http://parkplanning.nps.gov/commentForm.cfm?documentID=43768>

re: Glen Canyon LTEMP EIS Scoping Comments

To Whom It May Concern:

American Whitewater appreciates having the opportunity to provide comments during the scoping period for the National Park Service and U.S. Bureau of Reclamation's Glen Canyon Dam Long Term Experimental and Management Plan Environmental Impact Statement (LTEMP EIS). On January 10th, 2012, American Whitewater submitted joint comments with Grand Canyon River Guides, Grand Canyon River Runners Association, Grand Canyon River Outfitters Association, and Grand Canyon Private Boaters Association. We incorporate those comments by reference, and submit the following additional comments regarding the operation of Glen Canyon Dam.

American Whitewater is a national 501(c)(3) non-profit organization that works to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely. Through our combined membership and affiliate clubs, we represent the conservation interests of tens of thousands of whitewater enthusiasts nationwide. As avid whitewater recreationists, we place a high value on protecting and restoring naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and cultural connections. Our membership highly values the Colorado River, particularly as it flows through Grand Canyon National Park. As a result, we have a direct interest in seeing the Colorado River below Glen Canyon Dam be managed in a way that complies with the Grand Canyon Protection Act of 1992, uses sound science to restore the river and its natural hydrograph, protects and recovers endangered species, and ensures a positive recreation experience for all who visit the river.

**CONSIDERING ECOLOGY, CULTURAL, AND RECREATION VALUES IN
MANAGEMENT DECISIONS**

The Grand Canyon Protection Act ("GCPA") requires the Secretary to "operate Glen Canyon Dam...in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use" (GCPA, Section 1802(a)). The LTEMP EIS should ensure that all alternatives are in alignment with the GCPA, and be written with the consideration that the primary purpose of the operation of Glen Canyon Dam should look beyond maximizing hydropower interests. The underlying purpose of Glen Canyon Dam, which was authorized by the Colorado River Storage Project Act of 1956, was to regulate the flow of the Colorado River for water storage and supply. Hydropower was

listed as an “incident” of water supply purposes (see Section 1 of the Colorado River Storage Project Act – 43 U.S.C. § 620(1)).

The Colorado River and Grand Canyon is a complex ecosystem, and our understanding of it is evolving as we continue to monitor and study the area. American Whitewater supports continuing research under all alternatives, and adaptively managing the system to respond to new information throughout the next 15 to 20 years. The USGS’s Grand Canyon Monitoring and Research Center (GCMRC) has been the leading research body for the Colorado River, and as such, should play a key role in *both* developing the EIS and experimenting, monitoring and informing the Adaptive Management Work Group (AMWG) into the future. Additionally, because the AMWG is tasked with recommending management actions relating to dam operations to the Secretary of the Interior, American Whitewater supports a more balanced make-up of the AMWG in the future to reflect the ecological, cultural, and recreational values of the canyon.

Additionally, numerous river systems throughout the country are managed by dam operations, and much is being learned about how to operate dams in a way that strives to restore riparian ecosystem functions as much as possible. We suggest that the GCRMC and Adaptive Management Working Group look to these other examples, learn what has worked and what hasn’t, and assess whether they would make sense for the operation of Glen Canyon Dam and the restoration of the Colorado River below the dam. For example, the rate at which flows are increased before a high flow event and then decreased afterwards can have a significant impact on the riparian system.¹ Known as the “snowmelt recession,” American Whitewater has either successfully used, or is currently advocating for, this model on California’s McCloud, Feather, and Yuba/Bear rivers, and Colorado’s Upper Colorado and Dolores rivers. We support seeing flow regimes similar in intent, which mimic the natural hydrograph, considered in the discussions of High Flow Events below Glen Canyon Dam.

SEDIMENT/FLOWS

As was mentioned in our joint letter, one our primary concerns relates to the restoration and maintenance of the Colorado River’s sandbars and beaches. Glen Canyon Dam blocks approximately 90% of the potential sediment load in the river, which has had a significant impact on numerous values, including habitat for federally listed endangered species and other wildlife, beaches for hikers and whitewater enthusiasts, and protection for cultural resources.

In our joint letter, we ask that the LTEMP take maximum advantage of natural sediment augmentation opportunities from the Paria and Little Colorado River watersheds and test the best-case scenario presented in the article, “*Is There Enough Sand? Evaluating the Fate of Grand Canyon Sandbars*”, *GSA Today*, Volume 18, Issue 8, August 2008. Additionally, American Whitewater supports the finalization of the High Flow Experimental Protocol Environmental Assessment so that it can be incorporated into the alternatives considered in the LTEMP EIS. Since 1996, the GCMRC has studied three high flow events to enhance sediment build-up on beaches, which have proven to be beneficial for beach building. More beach building

¹ See Yarnell, S, Viers, J and Mount, J. 2010. Ecology and Management of the Spring Snowmelt Recession, *BioScience*, Vol. 60 No. 2. Available at: http://watershed.ucdavis.edu/pdf/Yarnell_etal_Bio Science2010.pdf

flows should be studied in the future, with recreational safety in mind. Additionally, adaptive management actions should consider the larger picture, examining whether the distribution of sediment is meeting the downstream values and goals rather than just focusing on the volume of sediment.

The GCPA also requires the operation of Glen Canyon Dam to be consistent with the “Law of the River”, providing water resources to the Colorado River Basin States. These flows include “equalization” flows between Lake Powell and Lake Mead. The LTEMP EIS should take a proactive approach in recognizing that these flows may be necessary in the future, and develop a way to implement them while giving full consideration to downstream values.

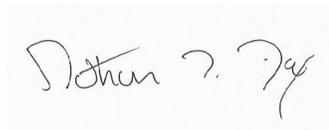
ALTERNATIVES

Future management decisions about hydropower and water supply need to be implemented in a way that does not harm, and when possible, protects, restores and enhances the ecological, cultural and recreational values of the Colorado River below Glen Canyon Dam. American Whitewater believes that *all* Alternatives considered in the LTEMP EIS should:

- Meet the intent of the Grand Canyon Protection Act of 1992, which requires that Glen Canyon Dam be operated in a way that “protect(s), mitigate(s) adverse impacts to, and improve(s) the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use” (GCPA Section 1802(a)).
- Comply with National Park Service Management Policy 1.4.7.1 (2006), which does not allow uses that would cause unacceptable impacts to park resources and values.
- Be based on solid scientific research and include experimentation and adaptive management into the future;
- Include flows that restore, enhance, and protect beach habitat and sandbars;
- Look beyond mass sediment balances and examine whether the sediment benefits, protects and enhances downstream values;
- Improve the quality of the recreational resources of the river, and insures their protection into the future.

Thank you for considering our additional comments and original letter. We appreciate your work on the operation of Glen Canyon Dam and look forward to the Draft LTEMP EIS.

Sincerely,



Nathan Fey
Colorado Stewardship Director



Megan Hooker
Associate Stewardship Director