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Secretary Dirk Kempthorne
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

October 16, 2007

RE: MINORITY REPORT - Rationale for a WY 2008 experimental BHBF

Dear Secretary Kempthorne:

As a recreational stakeholder of the Glen Canyon Dam Adaptive Management Program (AMP), we are writing to recommend that you conduct a Beach-Habitat Building Flow (BHBF) in WY 2008. At this time, there is a large amount of sediment in the river throughout the Grand Canyon but it is below water level and of little value to the ecosystem. **We believe that a strategically-timed BHBF early in 2008 will rebuild sand bars and test critical hypotheses on how to best operate the dam for endangered species, eroded cultural sites, sandbar habitats, and increased recreational use.**

Sediment conditions due to recent inflows from the Paria River and the Little Colorado River are nearly 2.5 times the amount previously deemed adequate to trigger an experimental beach habitat building test. In fact, the conditions are more enriched now than at any other time since at least 1998 (GCMRC memo, August 21, 2007). Large storms in October 2006 and summer 2007 generated tributary floods, which delivered enormous volumes of fine sediment from the Paria and Little Colorado Rivers and numerous small tributaries. Subsequent dam releases have been modest enough to distribute this sediment load into hundreds of eddies throughout the length of Grand Canyon while minimizing sediment transport to Lake Mead. The river channel is perfectly primed to test a major unanswered question, ‘Can the dam be re-operated to restore essential natural, cultural, and scenic landscape features of the river ecosystem in Grand Canyon?’

Since the BHBF is a common element to all alternatives in the Long Term Experimental Plan (LTEP), it makes sense to scientifically refine and optimize our understanding of this tool. **A BHBF is the only feasible way to move the channel sand up into the riparian zone where it can provide critical protection for multiple resources.** The present BHBF design bypasses about 0.25 million acre feet (maf) past the turbines, which is only 3% of an 8.23 maf minimum release year. This seems to us a small expenditure for a potentially major benefit. **It is unlikely there will be a chance to run such a highly enriched test again for many years.** This is a crucial opportunity to further hone the efficacy and design of these experimental flows to ensure a successful outcome of the LTEP.

We would also like to emphasize the simple monetary value of the sediment in place compared to the replacement costs from a sediment augmentation pipeline around the dam. **Using the BOR estimates for capital costs (amortized over a 40-year life) and annual operating costs, one million tons of sand might cost \$11 million to deliver to Lees Ferry. Thus, the current amount of sand has a replacement value of more than \$27 million.** We consider that the river ecosystem presently has “money in the bank” to leverage for the immeasurable values of the river ecosystem. The alternative is to slowly and progressively send it (“spend it”) downstream to Lake Mead where it can only decrease reservoir storage and inhibit navigation for the Hualapai Tribe and river-rafting industry. We think it wise to utilize tributary sediment before resorting to more severe and costly means to achieve program goals.

Sufficiently high sediment conditions existed in fall 2006 for the Grand Canyon Monitoring and Research Center (GCMRC) to recommend a BHBF in 2007. The TWG concurred at their November, 2006 meeting. At that time, the AMWG declined to adopt the TWG recommendation for a BHBF and instead asserted the need for an “off-the-shelf” science plan before any additional BHBFs could go forward. The TWG has now approved GCMRC’s BHBF Science plan as technically sound, at the October 2-3, 2007 meeting.

In our 10 years serving in the AMP, we have seen many of the strengths and weaknesses of this approach to providing advice to the Secretary. Sometimes we stakeholders get stuck in “paralysis through analysis,” which inhibits forward momentum toward our program goals. This is where Interior needs to step in to provide leadership as directed by the Grand Canyon Protection Act of 1992.

Grand Canyon River Guides appreciates your commitment to focus on the most important short and long-term resource management issues facing the AMP, and commends your desire to continue the adaptive management approach to experimentation designed to benefit downstream resources. **We stand poised at a critical juncture, and we urge you to take immediate action in support of a Beach Habitat Building Flow in 2008. Time is of the essence to advance our scientific knowledge, refine the BHBF tool, and protect the natural, cultural and recreational values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established.**

Sincerely,

Andre Potochnik, PhD
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Grand Canyon River Guides, Inc.

John O’Brien
Technical Work Group representative
Grand Canyon River Guides, Inc.

Lynn Hamilton
Executive Director
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cc: Brenda Burman, Secretary’s Designee for AMP
Linda Whetton – Bureau of Reclamation
Technical Work Group Stakeholders
Adaptive Management Program Stakeholders
John Hamill – Grand Canyon Monitoring & Research Center