

**A Letter to Mr. Wayne Pullan, Glen Canyon Dam Adaptive Management Program Designee
for the Honorable Deb Haaland, Secretary of the Interior:
27 October 2021**

We, the undersigned, work through our organizations and governments to ensure the ecological, cultural, and recreational integrity of the Colorado River ecosystem (CRE) as stakeholders in the Glen Canyon Dam Adaptive Management Program (AMP). We greatly appreciate the collaborative, science-based approach of the AMP to management of the Colorado River ecosystem (CRE) influenced by Glen Canyon Dam through Glen and Grand Canyons. We thank the AMP for its recent high flow experiment (HFE) informational report [Final Recommendation Regarding a Fall 2021 High Flow Experiment (HFE) at Glen Canyon Dam, November 2021, dated September 28, 2021] and the informational session provided by Reclamation and the AMP Planning and Implementation (PI) Team, which decided against conducting an autumn 2021 HFE. We also appreciate the discussion held through the Technical Work Group (TWG) on 14 October 2021. However, we wish to express our concern with several issues surrounding this decision process.

1. AMP Tribal, environmental, and recreational stakeholders were not involved in the final decision on the potential for a 2021 HFE. To more fully realize the goals of the 1992 Grand Canyon Protection Act, we call on the AMWG to address the inequalities of stakeholder representation on the PI Team, and to support greater transparency in its decision-making. Our contributions and perspectives were not represented in this decision, and we feel we have been disenfranchised from this decision process. While we do not necessarily disagree with the PI Team's decision, we wish to be involved, and not excluded from, these important decisions in the future. Consequently and collectively, we request that the AMWG include all AMP stakeholder voices in such decisions, thereby moving towards the kind of consensus that is core to its role in advising the Secretary. If inclusion of our voices can only be achieved through a National Environmental Policy Act process, we request that the Secretary consider including our voices on the PI Team during the AMP's next NEPA-related effort.

2. Depletion of the Basin Fund was one of the primary reasons that the 2021 HFE was denied, yet future funding for the AMP is to come from appropriated funds, thus not draining the Basin Fund. Therefore, this reason for denying an HFE does not appear to be valid. Furthermore, we question the merit of a decision-making process wherein the Basin Fund's fiscal health outweighs the multiple benefits of an HFE on the CRE's ecological, cultural, and recreational resources. Most troubling, the HFE Informational Report recognizes the poor condition of the Basin Fund now and well into the future, regardless of whether an HFE is conducted or not. We are deeply concerned that this focus on the Basin Fund establishes a rationale and precedent to prohibit HFE's in the future.

3. We have additional concerns about the precedent set by the decision to forego a 2021 HFE. In 2021 the Paria River delivered the second highest amount of sand since recording began, exceeding the sediment trigger for an HFE. The CRE is now primed for an HFE to store that sediment at higher elevations, replenishing the now-depleted shallow shoreline habitats and camping beaches that support native fish and recreational camping, respectively. Sedimentological data provided by the USGS Grand Canyon Monitoring and Research Center supports this conclusion. Furthermore, with low flows likely for the next two or more years, the benefits of a winter 2021 or a springtime 2022 HFE would be long-lasting. Ultimately, we are concerned that the precedent set by the decision to forego an HFE is based primarily on considerations put forth by power generation and water interests, and that the mandates of the 1992 Grand Canyon Protection Act were insufficiently weighed in this decision. We believe that a more balanced approach that gives equal weight to all valued resources can be achieved without undue strain on important water and power resources.
4. We are further concerned that the AMP is insufficiently flexible in its adaptive management capacity: the AMP needs to be able to accommodate unforeseen but advantageous changes that arise. Predictions about how much snow will fall in the Rocky Mountains this coming winter are highly speculative, but the PI Team decision did not reflect consideration of contingencies. For example, above-normal winter flows should promote consideration of a springtime HFE. If flows are normal or slightly below average, a within-powerplant high flow (such as that conducted in March 2021) might be feasible. But if winter inflows are below normal, then a high flow may be precluded, despite the depleted condition of many Grand Canyon camping beaches. Unfortunately, the PI Team's decision apparently did not consider such options. This issue of administrative flexibility is important in adaptive management, and is in keeping with Dr. Petty's memorandum, encouraging the AMP to include both flow and non-flow management options in its recommendations to the Secretary. Adaptive CRE management demands such flexibility, as opportunities for improving resource stewardship may arise unexpectedly.
5. Lastly, the LTEMP sediment accounting periods have long been recognized as inadequate for the task of adaptive CRE management, a problem that constrains achievement of AMP goals. The present winter and springtime accounting periods preclude sufficient sediment from accruing in the channel to allow for a springtime HFE. This occurs despite the fact that natural historical floods occurred during springtime, and CRE species and processes are adapted to those springtime spates. CRE shorelines and sandbars benefit most from springtime high flows by rejuvenating camping beaches and shoreline habitats just prior to the onset of summer native fish spawning and recreational uses, respectively. The AMP has been repeatedly briefed by GCMRC and several stakeholders on the need and importance of seasonally appropriate, sediment-triggered HFEs, but the AMWG has not acted adaptively to rectify this error in the LTEMP. Therefore, we request that the AMWG

include this subject in its next meeting, and provide adequate time for a discussion to explain, work to resolve, and adaptively rectify this impediment within the LTEMP.

We comment on the above issues to help ensure that the AMP and the Secretary continue to respect, incorporate, and benefit from the perspectives of all of its stakeholders. We intend to continue to work together to ensure consensus on adaptive management issues and help the AMP make the best science-based recommendation to the Secretary.

Signatories to this Letter:

Kelly Burke, Executive Director of Grand Canyon Wildlands Council

David Brown, Grand Canyon River Guides

Peter Bungart, Hualapai Tribe

Daniel Bullets, Southern Paiute Consortium

Kevin Dahl, National Parks Conservation Association

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