# United States Department of the Interior

OFFICE OF THE SECRETARY
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December 20, 2007

To: Members, Glen Canyon Dam Adaptive Management Work Group

From: Brenda W. Burman, Deputy Assistant Secretary – Water and Science
Secretary's Designee for the Glen Canyon Dam Adaptive Management Work Group

Subject: Status and Recommendations for a Potential Spring 2008 Glen Canyon Dam High-Flow Test

As you know, the Department has been actively considering a high-flow test at Glen Canyon Dam for over a year. The potential experiment is under consideration in light of unique, sediment-enriched conditions in the Grand Canyon as a result of intense storms over the past 18 months.

I had the opportunity to speak with nearly all of the AMWG members in consultation November 29 and wanted to provide you with an update regarding those conversations and the Department's consideration of the potential high-flow test. For informational purposes, a short summary of the range of AMWG member input that we received is as follows:

- Some members sought DOI feedback on what scheduled 2008 activities would not take place if a 2008 high-flow test were undertaken, due to staff or budget limitations.
- Many members noted that the current sediment-enriched condition presents a unique opportunity for resource protection, advancement of understanding and demonstration of a commitment to adaptive management.
- Some members noted that an early 2008 high flow test is very timely, given existing degraded beach conditions in the Grand Canyon.
- We received comments that the potential experiment is well planned, given the significant improvement in GCMRC's science plan over the past year.
- Members noted the appropriateness of the test, given the value that Americans place on protection of the Grand Canyon.
- Other members noted that the planning for the potential test is currently incomplete in that there needs to be additional outreach and inclusion of Tribal concerns and perspectives, especially regarding cultural sites in the Grand Canyon.
- Some members felt that the potential benefits of the experiment have been overstated, especially with respect to experimental elements linked to the conservation of the endangered humpback chub.

- Some felt that a high flow experiment is premature, at this time, given the lack of a full and complete synthesis of 2004 test results.
- Some entities felt that the current structure of the proposed test is inconsistent with a 2001 Appropriations Act provision - due to unmitigated financial impacts on hydropower production associated with the proposed test.
- A number of entities expressed concerns based on legal grounds involving provisions of federal law, and provisions of the 1996 Record of Decision (and 1997 Glen Canyon Operating Criteria) addressing "Beach-Habitat Building flows."
- We heard that the test would have adverse economic impacts on the Lee's Ferry Fishing Guides & the motel economy near Lee's Ferry in light of the current proposed timing (March 2008).
- Some entities thought that the current proposal was inconsistent with the "more balanced" approach contained in the 2002 integrated BHBF, fish suppression flows and non-native control approach.
- Some expressed the view that while high-flow testing may be desirable, there was "no urgency" to undertake a test in early 2008 because of the anticipated retention of current sediment volumes through 2009 due to the expected pattern and volume of flow releases from Glen Canyon Dam over the next year.

Earlier this month, the DOI Glen Canyon Dam Policy Group met to consider the Department's approach to the potential high-flow test.

The Policy Group discussed and considered the factual circumstances and the comments of the AMWG representatives. Ultimately, the Policy Group made three decisions: 1) DOI agencies should actively proceed with environmental compliance activities for a potential test; 2) GCMRC should actively work to prepare for such a test, though such efforts must recognize that the high flow experiment is only a proposal at this time, and no decision will be made on whether to proceed until completion of appropriate environmental compliance; and, 3) we should seek to identify approaches that could minimize potential adverse impacts as a result of the potential test. To be clear, DOI has not yet made a final decision as to whether to proceed with a test, and a final decision on this question will await preparation and completion of appropriate environmental compliance documents and further consideration of the pending GCMRC Science Plan.

I very much appreciate the time you all took to share your views on this potential opportunity to gain important information regarding the resources downstream of Glen Canyon Dam. The input was thoughtful, well-considered and constructive, and will improve the quality of the Department's upcoming decision.

I look forward to seeing you all soon, and wish all of you a Happy Holiday season.