



27 May, 2012

Secretary of Interior
Honorable Ken Salazar
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Re: Glen Canyon Dam Long-Term Experimental and Management Plan Environmental Impact Statement (LTEMP)

Dear Secretary Salazar,

While we appreciate your confidence in the LTEMP process as noted in Assistant Secretary Castle's letter¹ of April 23, 2012 responding to our letter² of April 2, 2012, we offer more examples to further demonstrate that Interior's confidence in this initiative is unwarranted and that you should intervene and review this process immediately. The EIS team continues to offer a weak level of organization and professionalism revealing a lack of commitment to the serious nature of the work before them, and the future impact it may have on one of the world's most beloved natural treasures.

- 1) The hastily organized Flagstaff meeting on alternatives noted in our previous letter indeed turned out to be poorly attended and far less productive than it could have been had more notice and preparation been afforded. As was typical, the attendees were mostly members of the Adaptive Management Working Group and the Technical Working Group. In general, it was merely another meeting of the same faces that gather regularly in Flagstaff—faces that are largely responsible for the flawed decision making creating the problems the LTEMP is to address. The only additional voices were several people reinforcing those "recreation" activities already represented by longstanding AMP members and friendly to the continued operation of Glen Canyon Dam for water storage and power purposes.

¹ <http://www.livingrivers.org/pdfs/SalazarResponse23April2012.pdf>

² <http://www.livingrivers.org/pdfs/LRtoSalazar2April2012.pdf>

- 2) Now, it has been announced³ that the public can still submit potential alternatives until July 2nd. If that's the case, why did the alternative's meeting need to happen on only two week's notice back in the month of March? Why was the alternatives' meeting not calendared after July 2nd, and/or concurrent with the with any other official cut-off dates for such public submissions? Both the workshop and the submission date seem arbitrarily planned. The public would have been far better served with more time to prepare and potentially attend the workshop, as well as exposure to the full range of alternatives submitted. There was no reason this could not have occurred.
- 3) The same is true for the recently announced Science Meeting of August 22nd and 23rd. The information that theoretically will be presented at this meeting (no agenda in circulation as yet) would have been much more valuable during scoping. There is no new science being generated by the EIS team, so this will all be background. It should have been presented well before close of the public comment period. It's timing following the alternatives submission points again toward bias to support/oppose specific alternatives. Here again, like the alternative's workshop, there was no mention of such a meeting when the overall process was conceived, and thus no opportunity for the public to question its timing.

Interior's position, that because some of the above activities go beyond NEPA requirements, illustrates the competence and commitment of the EIS team is misguided. First, given the level of ecological devastation Glen Canyon Dam has visited upon the river ecosystem of this premier asset of international heritage, the public, as should Interior, demands nothing but the best in terms of professionalism and organizational competency in managing the LTEMP EIS process. Merely ticking-off NEPA boxes should not be the baseline by which the EIS team's outputs are evaluated. Additionally, regardless of such extra-credit standing in Interior's eyes, just because such additives exist, does warrant granting a pass to the process as a whole, especially since their haphazard planning and execution raises question regarding core competencies.

Second, as pointed out in both scoping comments and our previous correspondence with you, the process has been designed and implemented such that a thorough review of alternatives will not be taking place. In fact the team stated specifically, without cause or justification, that anything relating to the decommissioning of Glen Canyon Dam would not be evaluated. Such premature and unsupported conclusions stands in direct contrast to the spirit and intent of NEPA as regards to alternatives' evaluation. Can Interior and the EIS team prove that the continued operation of Glen Canyon Dam can under any scenario not avert the continued destruction of Grand Canyon's river ecosystem? Can interior guarantee the public that Glen Canyon Dam can continue to deliver the water and power benefits the EIS team so staunchly advocates, such that a frank public discussion can occur about the ecological sacrifices the public is sanctioning as a result of these supposed long-term water and power benefits? And if those long-term water and power benefits are so key, what are their alternatives vis-a-

³ http://ltempeis.anl.gov/documents/docs/LTEMP_Schedule_Announced_May2012.pdf

vis protection and restoration of the Grand Canyon river ecosystem, which after all, is the stated intent of this EIS process? So again, systematically excluding decommissioning as a viable alternative during scoping and identified biases exhibited toward the continued operation of the Adaptive Management Process illustrates that no, the team is not fully committed to the spirit of NEPA, and the Grand Canyon river ecosystem will continue to suffer as a result.

Furthermore, Ms. Castle's response to us regarding balancing "a complex set of interests" gives us great pause. Nowhere in her letter on your behalf did she even mention Grand Canyon National Park, the Colorado River, or the ecosystem in question. Clearly it appears Interior's leadership itself is lacking appropriate direction and fortitude regarding what the core issues are or to assure the public that Interior's leadership is committed to addressing these issues.

This whole process continues to be created on the fly. This is not what taxpayers nor the Grand Canyon deserves. We continue to doubt the capability and integrity of the EIS team to adequately fulfill their mandate when they can't even seem to organize a coherent process from which to incorporate and utilize input from the public.

So we once again request that you suspend this process until a new team can be assembled that is willing to put the public and the public resource first as opposed to furthering the same processes and procedures that have led to the damages their efforts are suppose to remedy.

Sincerely,

/s/John Weisheit
John Weisheit
Living Rivers, Conservation Director

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