



April 2, 2012

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

Dear Secretary Salazar,

Living Rivers, Center for Biological Diversity and River Runners for Wilderness are writing to request your immediate intervention to reverse the poor execution by the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) Environmental Impact Statement (EIS) team to meet its responsibilities for this critical EIS process.

By following participation in the scoping process, reviewing the Summary of Scoping Comments, other EIS team materials and our recent participation in the webinar, it's clear this team is ill-equipped to manage the complexities of this assignment, so as to assure an outcome suitable to remedy the declining habitat conditions in the Colorado River corridor of Grand Canyon National Park relating to Glen Canyon Dam's operations.

We request that the current team's activities be suspended, including the upcoming Alternatives Development meeting in Flagstaff, and new leadership appointed to remedy the following concerns:

1) Clear articulation and understanding of purpose and need for this EIS

In its March 30, 2012 newsletter the EIS team expanded on the Purpose and Need for the EIS contained in the Federal Register notice of July 6, 2011. But as noted by us and others during the scoping process, the most fundamental

issues are being ignored. This EIS is needed, and thus its purpose is to correct the poor performance of the Adaptive Management Program (AMP) led by the Adaptive Management Working Group (AMWG) in executing its own responsibilities toward assuring compliance with federal laws and statutes as they pertain to the declining habitat conditions in the Colorado River corridor in Grand Canyon National Park. A nearly identical EIS process was undertaken 20 years ago to address these same problems, yet the purpose and need in no way addresses this failure and its associated impetus (need) for this new EIS process.

Therefore, a key purpose of this EIS process must be to conduct a full, independent evaluation of AMP and the decision-making process surrounding it, in order to inform the public why the AMWG has failed to achieve the charges entrusted to it and, as such, how additional public monies must now be invested to address the same problems 20 years later. Without such an evaluation of the AMP and alternatives to it, the dam operation alternatives developed through this process will not have the benefit of learning from the past mistakes, and thus destined to repeat them. A simple review of Tables 1 & 2 of the aforementioned newsletter reveals nothing that was not also addressed in the 1996 Final EIS process, so why should the public assume different results?

By way of example, during the March 27th webinar, it was explained that the EIS alternatives were unlikely to address the interim guidelines of the 2007 ROD for shortage criteria, which recently washed away significant quantities of sand and altered the prime elements of habitat during the Fall steady flows. And these guidelines replaced those in operation since 1996, which too has failed to achieve any meaningful benefit as prescribed for the Grand Canyon Protection Act.

Not until a full, independent review of the past failings of the AMP process can Interior adequately engage the public on proposed new actions to correct these failings. Again, while this was addressed during scoping, it has so far been ignored in Purpose and Need commentary by the EIS team to date and represents a fundamental flaw in methodology and understanding of the assignment before them.

2) Elimination of EIS team's pro hydro and water supply bias

Section 3.1 Purpose and Need of the March 2012 Summary of Public Scoping Comments report states as follows:

“They noted that the primary purpose of the Glen Canyon Dam should be water delivery to the lower basin, followed by the preservation and

recovery of downstream (i.e., the Colorado River corridor through Grand Canyon National Park and Glen Canyon National Recreation Area) natural resources and values; hydropower is secondary and should only be generated after the priority goals were addressed and managed.”

This is at best a weak attempt at summarizing some obscure definition of what's to be contained in this section and a dramatic mischaracterization of the public sentiment at worst. Any reasonable reading of the submitted comments emphasizes that the protection of Grand Canyon resources is the priority for this EIS process. Moreover this is supposed to be a discussion about the purpose and need for the EIS to reflect more on the impairment of Grand Canyon National Park, than the operations of Glen Canyon Dam. And were it a discussion about the dam itself, there were considerable comments about partial or full decommissioning of the facility, but this was not mentioned in the section at all. Moreover, the public's opportunity to comment on such decommissioning (the purpose and need for the dam) was dramatically impeded by the EIS Teams FAQ's unsubstantiated statement:

Will the removal of Glen Canyon Dam be considered as an LTEMP alternative? No, dam removal will not be considered because it does not fit the purpose and need of the LTEMP and would be beyond the scope of the EIS.

Full or partial dam decommissioning is a reasonable alternative to be explored, especially as the no-dam baseline is something that must also be understood prior to the evaluation of any alternatives, which thankfully was noted in the Summary of Comments.

Are we to assume that other alternatives will be summarily dropped as well, such as Run of the River and Seasonally Adjusted Steady Flows? Does this also include dropping science-based prescriptions, such as building a Temperature Control Device or implementing Mechanical Sediment Augmentation?

Also germane to this Purpose and Need, but not reflected in Summary of Comments, was how the overall attitude of commenters was far more opposed to the generation of hydroelectric power. The EIS process that concluded in 1996 provided a suite of comments that were much more willing to give hydropower the benefit of the doubt, trusting that flow alternatives could be devised in order to bring about habitat improvements in Grand Canyon and as expressed in the purpose and need for that initial EIS. But nearly 20 years hence, the public comments as a whole are far more strident in regards to putting the Grand Canyon resource first, not to mention the significant number of comments referencing full and partial dam

decommissioning. Regardless of ones interpretation of these different sample sets, it's undeniable that the sentiment in 2012 is much stronger for doing whatever it takes to improve the habitat conditions in Grand Canyon's river corridor first, then address how and if Glen Canyon Dam should be operated. This is a significant shift that the EIS team has completely omitted in their assessment.

The error in such an omission magnified when given the following statement in the Summary of Comments, Section 3.3.2 Hydropower:

Comments recognized that hydropower provides a clean, low-cost source of energy that can be relied upon for long-term, stable production of domestic energy.

Here again, this is a gross exaggeration of the general pool of comments, not to mention a farcical statement coming from the EIS team. While some commenters may be mistaken that in some instances large hydropower provides a "clean" source of energy, it's plainly obvious that in this context as illustrated by this exercise alone, that hydropower from Glen Canyon Dam is not clean at all. Glen Canyon Dam, as with all large dams, have routinely devastated downstream ecosystems, not to mention destroyed the habit conditions their reservoirs occupy. To state without exception that "commenters recognize ..." implies that not only the group as a whole supports this view which as noted above does not, but that the EIS team itself has reached this conclusion and is further biasing the process with its choice of language and unsubstantiated conclusions.

3) Improved communications to adequately engage the public in this process

Such biased behavior by the EIS team is precisely the type of actions that have lead to the disenfranchisement of the public toward this process to date. In 1989 more than 17,000 written scoping comments were received. In 2012 less than 500 scoping comments were received. Such a drop off in no way illustrates that the public is uninterested, as evidenced by the details of those comments that were received. No, the decline has much more to do with the failure of the AMP process to date, combined with its associated complexities that have created public confusion and frustration deterring participation. We've heard this repeatedly during the scoping process by both individuals and representative of various stakeholder groups.

The public has no belief that this process will yield any change, and as noted above, the EIS team's actions to date have only worked to perpetuate this sentiment. Again, the webinar: it was not only poorly attended, but included

virtually the same representatives one would find at a meeting of AMWG. Moreover, the dialogue and topics were largely geared toward that audience as well. Now, with only 2 weeks notice, the public has been asked to take part in a 2-day meeting on alternatives in Flagstaff, Arizona where no substantive agenda has been put forth. Even were the public not invited, such lack of organization and planning demonstrates the lack of professionalism with which the EIS team is treating their assignment. So once again, why should the public care when the outcome seems pre-determined to merely mimic the mistakes of the past? Were the EIS Team serious about its charges they would have been out in front on this issue and communicating to the public why they can expect this process to be different, but instead it's really just more of the same.

Combined, the culture, direction and approach exhibited by the EIS gives the public little hope that this process will yield the analysis and findings necessary to meet the urgent needs of the declining habitat conditions within Grand Canyon National Park's river corridor. They merely reflect, as forecasted in our scoping comments of February 2007 (LTEP) and January 2012 (LTEMP), that the EIS team has no serious interest in addressing the true purpose and need for this EIS, and merely leave it up to the courts to enforce should the public be so inclined.

We urgently request that you intervene in this matter by suspending the EIS team's activities until these key problems are remedied.

Sincerely,

John Weisheit
Living Rivers



Robin Silver
Center for Biological Diversity

Jo Johnson
River Runners for Wilderness