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Glen Knowles
Bureau of Reclamation
Environmental Resources Division
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Re: Draft Environmental Assessment Non-Native Fish Control Downstream from Glen Canyon Dam

Dear Glen,

Living Rivers/Colorado Riverkeeper (LR) and Center for BIological Diversity (CBD) provide the following comments to the Bureau of Reclamation (Reclamation) for a proposal to control non-native fish in the Colorado River downstream from Glen Canyon Dam from 2011 to 2020.

The purpose of the action is to minimize the negative impacts of competition and predation on an endangered fish, the humpback chub in Grand Canyon. The action is needed because competition and predation by rainbow trout and brown trout are reducing survival and recruitment of young humpback chub and threatening the potential recovery of the species. Rainbow trout and brown trout are not native to the Colorado River Basin and have been introduced into the region and are managed as sport fish.

THE MANDATE OF THE 1995 EIS TO PRESERVE NON-NATIVE TROUT IN GLEN CANYON IS FLAWED AND MUST BE ELIMINATED

In 1962 the promoters of stocking trout into the Colorado River system intentionally applied 20,000 gallons of the poison rotenone into the upper Green River with the sole purpose of annihilating "trash fish," both native and non-native, so that hatchery trout could then be introduced to dominate the higher trophic levels of the ecosystem. The reason behind this action to create a designer ecosystem for trout was to generate revenue from recreational sport fishing.

When people like Robert Miller, who first described the humpback chub in 1946, and Wallace Stegner brought this tragedy to the attention of Secretary Stewart Udall, an order was given to all Interior employees to cease and desist from any further acts of genocide against the gene pool of native fish species. In 1966, Mr. Udall began the process to create a national policy what would inevitably become the Endangered Species Act of 1973. In 1967 the Department of Interior (DOI) designated the humpback chub and the Colorado pikeminnow as endangered species.

Despite this incident and a federal mandate to reverse course and proactively remove jeopardy for endangered species, the existence of the non-native trout in the Colorado River basin remains sanctioned, especially in the tailrace behind every major dam built by the Department of the Interior. The reason for this contradiction is the same as before, to generate revenue from recreational fishing, even though hundreds of millions of dollars have been spent on the recovery programs for endangered fish. The acceptance of this irony and contradiction is actually quite stunning.

This irony is expressed in the 1995 Environmental Impact Statement (EIS) of Glen Canyon Dam operations, which aptly demonstrates one of many major flaws in the document, and in this case that a non-native fish species has a defender in the Adaptive Management Program (AMP) even as the species is systematically being removed below the mouth of the Paria River. The action and costs of mechanical removal will be perpetual, as long as trout exist and breed above the Paria River.

It is admirable that the EIS writers wished that Interior could be all things to all people, but these wishes are indeed working against the greater purpose of removing jeopardy for endangered native fish and restoring their ecosystem in an effective and well-reasoned manner. LR and CBD ask that the money and resources that are presently used to preserve trout populations above the mouth of the Paria River in Glen Canyon be transferred to trout removal and fish monitoring programs.

Once this is accomplished, we hope that extirpated native species will finally be re-introduced to occupy their rightful place in the ecosystem, which has been a prime objective of the Adaptive Management Program (AMP) for 15-years.

MANAGEMENT OF DISCHARGE, TEMPERATURE, AND SEDIMENT FOR RECOVERY WILL REMAIN UNADDRESSED BY AMP

In 1993 five ichthyologists that are all very well-known by AMP members, namely Robert Clarkson, Owen Gorman, Dennis Kubly, Paul Marsh and Richard Valdez, wrote a paper called Management of Discharge, Temperature, and Sediment in Grand Canyon for Native Fishes[1].

The writers make it very clear that their document is altruistic and does not weigh into politics and economics. It is a document that basically says, this is how you recover

[1] http://www.riversimulator.org/Resources/GCDAMP/GCDAMPchronicle/Clarkson1994.pdf

native species and their habitat so that extirpated species can be reintroduced into the Colorado River below Glen Canyon Dam. The simplicity and straight-forwardness of the document is actually a refreshing read.

The suite of recommendations from the writers are as follows, 1) mechanical removal of non-native fish, 2) match the historic hydrograph as much as possible (seasonally adjusted steady flows), 3) mechanically modify the temperature of the river (selective withdrawal), 4) mechanically augment the system with sediment. Of these four recommendations only one has been implemented, namely mechanical removal of non-native fish and in 2003.

Obviously, politics and economics is why the other three recommendations have yet to be implemented, and this EA makes it very clear that mechanical removal of fish is the only formative recommendation that will be embraced in the next ten-years.

This is unfortunate, but above all it demonstrates that AMP is unwilling to fulfill it's obligations to re-introduce extirpated species as quickly as the ecosystem in Grand Canyon was altered, which are outlined in primary documents such as Desired Future Conditions[2], the Management Plans for Grand Canyon National Park, and the 2006 Management Policies of the National Park Service (summary for AMP[3]).

Attention to this requirement has been pushed so far off into the future that it has become an issue of non-compliance; for 15-years, the river has not been properly prepared by AMP to receive brood stock of Colorado pikeminnow, razorback sucker, bonytail chub and roundtail chub.

DEPARTMENT OF INTERIOR IS NON-COMPLIANT AND MUST INITIATE A PROGRAMMATIC EIS

LR and CBD first asked for a Supplemental EIS[4] to strengthen the native fish recovery program seven years ago, which was ignored. Despite our lawsuit in 2006[5] and the lawsuit of Grand Canyon Trust in 2007[6], nothing has changed. In fact, we think the AMP has become less compliant toward meeting its responsibilities under the 1993 Grand Canyon Protection Act and subsequent Biological Opinions. For example, the EIS that will soon be prepared will be inadequately funded and fast-tracked, depriving the resource of the assessment and scope necessary to consider and evaluate the range of alternatives that could meet its objectives. It's a forgone conclusion that all

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[2] http://www.riversimulator.org/Resources/GCDAMP/GCDAMPchronicle/DesiredFutureConditions2010.pdf

[3] http://www.usbr.gov/uc/rm/amp/amwg/mtgs/10aug24/Attach_15f.pdf

[4] http://www.livingrivers.org/archives/article.cfm?NewsID=567

[5] http://www.livingrivers.org/pdfs/ComplaintFeb2006.pdf

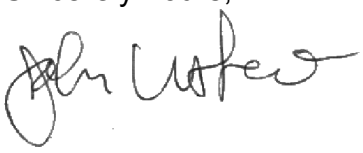
[6] http://www.livingrivers.org/Legal/GCT/GCTcomplaintDec2007.pdf

AMP is going to do in the next ten-years is remove some trout, run a few HFEs if the river is sand enriched, and provide fall steady flows. These actions are unlikely to improve the long-term habitat conditions for native fish and will thus merely prolong the period within which the AMP keep Interior out of compliance.

CONCLUSION: DOI MUST INITIATE A PROGRAMMATIC BASIN-WIDE ENVIRONMENTAL IMPACT STATEMENT

As we stated in the Environmental Assessment for High Flow Experiments our organizations request that a basin-wide Programmatic Environmental Impact Statement be initiated as quickly as possible in order to address the cumulative impacts more broadly and more effectively.

Sincerely Yours,



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