Stop the Death Sentence for the Colorado River in Grand Canyon National Park

COMMENTS NEEDED BY NOVEMBER 1, 2002!

Grand Canyon National Park is undertaking the development of a management plan for the Colorado River throughout its boundaries. This 240-mile wilderness caliber river corridor has been devastated by the impacts of Glen Canyon Dam . All native insect species are gone, as are four of eight native fish, otters, muskrats, and the native vegetation in high water zones. Despite this decline, NPS claims it will only address issues of Glen Canyon Dam that affect recreation, giving little consideration to the river's ecology. So they need to hear from you.

Furthermore, this river wilderness has been transformed into a floating, motorized cash register for commercial river companies. Commercial operators are granted 80% of the access for those who can afford to pay, while the general public must wait twenty years to self-guide a trip through the Canyon.

Your input is urgently needed to remedy these and a number of other problems plaguing this artery of one of the world's most famous parks.

The National Park Service will be accepting written comments from the public through September 15, 2002, to help frame the scope of this new Colorado River Management Plan. They will also host public meetings in Salt Lake City, Denver, Phoenix, Flagstaff, and Las Vegas.

With these comments in hand, the Park Service will then spend the next 18 months developing a plan that will be presented in a draft environmental impact statement. However, without a strong voice from the public now, the Park Service will ignore these critical issues and embark on a pre-determined course to leave things much the way they are.

As Mr. Rob Elliott of American Outdoors and Arizona Rafting Adventures has stated to Congress, a regulated river experience is more important than Grand Canyon's native ecosystem. "Recreationally, the difference comes in the sediments and water temperature. Pre dam, or post draining Lake Powell, the water temperature in August would be 80 degrees and 10% of it would be mud. There would be lots of flies, no way to get clean, and no cold water to help perishable foods make it through the canyon for two weeks. Not a pretty picture. As an environmentalist and river runner who regards Grand Canyon as home, I and my customers rather like the river environment and species diversity which has evolved downstream from the dam the way it is today."

Such sentiment appears consistent with a new effort known as "Firewalk." By not challenging the significant problems caused by Glen Canyon Dam, by not fighting against the use of motors which violates the Wilderness Act, nor by demanding significant reductions in commercial permit allocations to accommodate those who desire a self-guided river running experiences, the Firewalk group is working to ensure

the Park Service promotes little change such that the commercialization of the river continues to flourish while its ecosystem continues to perish.

Your help is urgently needed now. There are three ways for you to participate:

1. Download the simple questionnaire from the National Park Service;

2. Craft your own letter, and

3. Attend one of the five public scoping meetings (dates & locations below).

Regardless of your chosen mode of participation, let the Park Service know that you want a Colorado River Management Plan that will:

1. Bring the Park in compliance with the National Park Service Organic Act by developing a plan to restore the ecological integrity lost to Grand Canyon as a result of the operations of Glen Canyon Dam including: restoration of flows, sediment and natural water temperature; a recovery program for all native species known to exist in the Canyon prior to the operation of Glen Canyon Dam, and the eradication of all alien species that are impacting natives.

2. Comply with the recommendations of the Park's 1977 Wilderness proposal, and manage the river corridor as outlined in the 1964 Wilderness Act. Ensure that all management decisions reflect "minimum requirement" in terms of Park Service and visitor impact as prescribed in the Wilderness Act.

3. Phase out the use of motorized river transport so that all travel occurs at river pace. Motorized transport is unnecessary and inconsistent with the mandate that the river corridor be managed as wilderness.

4. Provide for full partnership with Native American tribes affected by the Plan, including mechanisms to protect and restore sacred sites and opportunities for Tribes to operate any concession services still deemed necessary once the Plan is complete.

5. Provide for an equitable system for individuals to access the river corridor that does not bias against those who cannot afford to buy their way onto a commercial river trip. Encourage the establishment of a waiting list for all people. Once at the top of the list, the permitee can determine how they wish to travel down river, either self-guided or with the assistance of a commercial company.

6. Following its completion, require the development of a "Needs Assessment" for concessionaire services to determine at what level such services need to continue on the river. This assessment must be completed prior to renewing any concessionaire contracts beyond 2005.

You can mail your comments to:
Linda Jalbert
Colorado River Management Plan
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023
(928) 638-7909
email:gcra-crmp.nps.gov

Colorado River Management Plan Scoping Meetings

Thursday, August 1, 2002
Denver, Colorado
Community College of Denver Downtown Campus
Tivoli Student Union Conference Center
900 Aurora Parkway

Tuesday, August 6, 2002
Salt Lake City, Utah
Salt Lake Community College-Miller Campus
Miller Training & Conference Center
9750 South 300 West

Thursday, August 8, 2002
Flagstaff, Arizona
Coconino Community College Commons
2800 S. Lone Tree Road

Tuesday, August 13, 2002
Las Vegas, Nevada
University of Nevada Las Vegas
Moyer Student Union Building
4505 Maryland Parkway

Thursday, August 15, 2002
Mesa, Arizona
Mesa Community College
Kirk Center-Navajo Room
1833 W. Southern Ave.

All meetings will be held in an open house format and there will be no formal presentations. The public is encouraged to stop by any time from 4:00 p.m. to 8:00 p.m. for information and to provide input.

Click here for additional information on the Colorado River Management Plan from the National Park Service

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Take Action 07/01/02

River Management Plan-Scoping Form Download

Click here to download a copy of the scoping form [36k PDF File]

River News 07/01/02

About Firewalk

The following is NOT SUPPORTED BY LIVING RIVERS. It is presented here so the public may be better informed on the weak river stewardship and wilderness ethics associated with some of the parties attempting to influence the River Management Plan now being developed for Grand Canyon National Park.
One members of Firewalk has sumitted additional information about the group which he asked to be posted. This and Living Rivers response can be found below.

For more information on the Firewalk initiative contact Mark Grisham, Grand Canyon River Outfitters Association, mark@gcroa.org, (928) 556-0669.

Firewalk Guiding Principles

1. In accordance with existing law and policy, the fundamental requirement of the Colorado River Management Plan is the preservation of the Colorado River corridor within the Grand Canyon as an unimpaired natural and cultural area, to the extent possible given the downstream effects of Glen Canyon Dam.

2. The revised Colorado River Management Plan should strengthen and enhance the Grand Canyon river experience as one of North America's premier wild and primitive backcountry river journeys.

3. Because demand for recreational river use substantially exceeds the level necessary to protect the resource and river experience, visitation opportunities in the Colorado River corridor within the Grand Canyon must be rationed and distributed in a sustainable and equitable manner that awards all potential users with a sense of fair treatment in relation to each other.

4. Within resource protection and visitor experience quality parameters, Grand Canyon river trip visitation opportunities should be maximized and equitably distributed to the greatest number of unique participants as practicable, while maintaining a full and diverse range of available trip styles.

5. The Grand Canyon river experience exerts a tremendous draw on potential visitors of all types of backgrounds, from across America and from around the World, including highly proficient and committed outdoor and whitewater

recreationists, to those with no previous experience in the wild, primitive, backcountry environment. Colorado River corridor management and administration must acknowledge, respect, and respond to this wide spectrum of user interest, need, and expectation.

6. Qualifying areas within Grand Canyon National Park deserve wilderness designation. The President should immediately make his recommendation to Congress in this regard. Until Congress acts upon such a recommendation, the National Park Service remains obligated to protect the suitability of all identified qualifying lands. The Colorado River within the Grand Canyon is unique, and provides outstanding visitor opportunities to experience solitude, a primitive and unconfined type of recreation, and natural quiet; therefor, its management should preserve and enhance these opportunities. A reasonable level of motorized use on the river is compatible with the Wilderness Act of 1964 as an established use under Sec. 1133(d)(1), and can be a tool used to enhance visitation, dispersal, and expanded trip opportunities. As technology advancements allow, a transition to low noise or silent, non-polluting propulsion systems suitable for Grand Canyon river operations should be implemented.

7. The revised Colorado River Management Plan should identify present activities that are inconsistent with existing Grand Canyon National Park General Management Plan "Management Objectives" for the Colorado River and establish a strategy, as well as a pragmatic implementation schedule, to mitigate such activities in a manner consistent with other priorities. Creative problem-solving opportunities may exist through active and site specific management techniques, or through adaptive management processes.

8. The Colorado River Management Plan should impose comparable rules, regulations, and policies on all user sectors to the maximum practical extent, without compromising the essential characteristics of each sector.

9. The private permit distribution system should be distinguished by simplicity, practicality, ease of use, and equality of opportunity, so NPS administration is fair, and can provide responsive customer service economically. A multiple path private river trip permit distribution system may assist the goal of achieving the best possible access to the river experience.

10. The Temporal Recreation Opportunity Spectrum, which involves variable seasonal launch scheduling, should remain a part of Colorado River management, in order to provide a variety a of visitor experience opportunities.

Comments asked to be posted by Firewalk members since Living Rivers posted this information.

Living Rivers response to Earl Perry, July 12, 2002

Earl Perry Letter to Living Rivers, July 11, 2002

River News 07/03/02

RRFW Riverwire - GRAND CANYON NEEDS YOU

As you are now aware, the dates and locations for public scoping meetings have been announced. Here are a few issues we hope you will care to write about:

WHO GETS TO GO?
The CRMP revision will specify who gets to go on Grand Canyon river trips in the future. A common argument voiced by river concessionaires is they need the lion's share of river trips to serve America. The majority of concessions trips serve the top 25% of America's income earners. Don't you deserve to go regardless of your ability to pay?

HOW MUCH PUBLIC ACCESS?
This year, as for each of the past 15 years, about 19,000 commercial passengers, 3,000 commercial crew, and 3,000 general public boaters will enjoy the Grand Canyon river experience. Motor-free wilderness management alternatives now under consideration by the National Park Service can increase visitation to the river while adding fairness in access not seen in over 30 years.

HOW LONG IS YOUR VACATION?
Since the Wilderness Act of 1964, river concessionaires have continued to use large, polluting outboard motorized tour boats in mockery of all wilderness areas in our national parks. Today, 3 out of 4 commercial passengers are only offered a 5 night glimpse of 2/3rds of the canyon. A motor-free Colorado River will allow more Americans to experience the entire canyon in 11 to 12 days, at the river's pace. Rowing trips of 6 to 8 days will allow a more intimate experience with part of the canyon.
Look for additional information about the issue and the process coming from River Runners for Wilderness. Please take a few minutes to consider the issues and get involved.

Grand Canyon needs your help to protect it from self-serving commercial interests. Send comments or make them in person at one of the 4 scoping sessions. For more information on these sessions, visit www.nps.gov/grca/crmp

To comment by mail:
CRMP Team,
Grand Canyon National Park,
PO Box 129,
Grand Canyon, AZ 86023
or by email: grca_crmp@nps.com

RIVERWIRE is a free service to the boating community from River Runners For Wilderness. Participation is FREE (and required!). Send your e-mail address to riverwire@rrfw.org and we'll add you to the RRFW RIVERWIRE e-mail list. RRFW is a project of Living Rivers. Visit our website at www.rrfw.org

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River News 07/05/02

RRFW Riverwire - DO WE NEED RIVER CONCESSIONAIRES?

Do we need river concessionaires in Grand Canyon National Park? Maybe not. What if the 16 concessionaires operating on the Colorado River in Grand Canyon National Park were changed into Incidental Business Permits (IBPs)? This flexible model allows for businesses to offer support services from food packs to consulting to guiding in a very competitive climate to meet the various needs of backcountry wilderness travelers from Boundary Waters to Grand Canyon.
The analogy is in hunting. Once the hunter draws a permit, they can hire a hunting guide. The same applies to GCNP backcountry, where once an individual receives a permit to backpack, they can seek out a guide to accompany them. The guide holds a National Park authorized IBP. GCNP can issue as many IBPs as there are companies thinking they would like to provide services to the market. Such open competition allows the greatest economic good to the regional economy.

WHAT ABOUT VISITORS IN NEED OF ASSISTANCE TO RUN THE RIVER?

Nearly all river travelers use support services, whether it is shuttle services for a non-commercial trip, or a gourmet guided trip on a tour boat. Wouldn't it make more sense to allow folks to contract just for the services they need whether it's a commercial-style trip for a family that is willing to provide and cook their own food, or a noncommercial group that needs only a cook or boatman? There would be an explosion of employment opportunities for experienced river staff and substantially more sales tax dollars in the coffers of northern Arizona.

River concessions have actively blocked park wilderness protection for the last 30 years. Wouldn't it be best to have businesses that support the park's wilderness resource instead of attempt to exclude the river from wilderness protection? The present river concessionaires use their financial and political might to change the course of river management and block much needed reform in the Grand Canyon.

A new river support services paradigm could be a reality with YOUR HELP. Please take a few minutes to consider the issues and get involved. Protect Grand Canyon from entrenched commercial interests. Send your comments by September 20, 2002 or make them in person at one of the 4 scoping sessions. To comment by mail, send your thoughts, along with your name and address, to:

CRMP Team
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023

or by email: grca_crmp@nps.gov

For more information on the scoping workshops, visit www.nps.gov/grca/crmp

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Letter to LR 07/11/02

from Earl Perry of Firewalk

"Such sentiment is consistent with a new effort known as "Firewalk." By not challenging the significant problems caused by Glen Canyon Dam, by not fighting against the use of motors which violates the Wilderness Act, nor by demanding significant reductions in commercial permit allocations to accommodate those who desire a self-guided river running experiences, the Firewalk group is working with the Park Service to promote little change so that the commercialization of the river continues to flourish while its ecosystem continues to perish." From: Living Rivers Action Alert, July 3, 2002"

To: John Weisheit, Living Rivers

You have not gotten this right, and I expect you to promulgate the note which follows:

Firewalk convened to see if people of good will on all sides of the issue could agree on steps that would provide private boaters with more access to the Grand Canyon, while improving both ecological and sociological aspects of the river experience in Grand Canyon. Some members of the working group are outfitters, some members of Grand Canyon Private Boaters, some members of Grand Canyon River Guides, and some of us wear many hats.

1. As a group we are not taking a position on Glen Canyon Dam. As individuals, some of us have been working on the Glen Canyon Dam issue since long before you ran the first of your hundreds of 1-day sport-boat motor trips through Cataract and on Lake Powell. We will continue to do so, as individuals. I would also note that as a group we are not taking positions on freeing Tibet, world hunger, or Animal Rights. Increasing non-commmercial access, bringing fairness to the system, without violating the preservation mandate of the Park Service, is the job we set ourselves.

2. You can certainly argue that the use of motors violates the spirit of a wilderness, but it does not violate the Wilderness Act. See section 4(A)1(d)(1) "Within wilderness areas designated by this Act the use of aircraft or motorboats, where these uses have already become established, may be permitted to continue

subject to such restrictions as the Secretary of Agriculture deems desirable." Why do you think the Middle Fork has so many lodges, the Selway airstrips, the Salmon jetboats? The law clearly provides that conflicting uses can be grandfathered in. Motor use in Grand Canyon predates the Wilderness Act. Congress will choose whether or not to continue motor use, if it acts on a wilderness designation. If you don't like it, bitch where it counts -- your Congressional delegation. You may win this one based on values, but you are not going to win it based on the law as it is currently written.

3. The working group is not "demanding significant reductions in commercial permit allocations to accommodate those who desire a self-guided river running experiences." It is evaluating a range of scenarios that we obtained by getting the ideas of outfitters, non-commercial boaters, and wilderness advocates. Some of these alternatives involve -- no motors
   -- increasing private use at the expense of commercial use
   -- increasing private and commercial use
   -- equalizing private and commercial use
   We are evaluating the effects of increasing/decreasing launches, user days, changing season structures, changing group sizes, and changing/creating alternative user sectors. We will expose fully the consequences of each alternative we examine.

4. We are not working with the Park Service; they are and will be working on their own to produce the plan required by settling the GCPBA lawsuit they asked for. They're aware of what we're doing, and they'll get a copy of anything we produce. At that point our ideas will stand or fall based on whether they embody sound planning and a spirit of temperate fairness. So will yours.

As a working group, we're not going to "demand" anything. We got together to manifest a spirit of reasoned cooperation and dispassionate examination of the widest range of alternatives we could find, to see if we can improve the situation for both sectors.

John, if you are going to function as a reporter, get your facts straight first. Then consider whether you advance a spirit of dialog by trumpeting factoids, falsehoods, and soundbytes.

Earl Perry

Boater 40 years, river guide 8, NPS recreation planner 2, NPS river manager 3, hydrologist 2.

John's Response to Earl

River News 07/12/02

RRFW Riverwire – DOES 'FIREWALK' TALK FOR YOU?

You may be aware that the 16 river concessioners in Grand Canyon formed the Grand Canyon River Outfitters Association (GCROA) several years ago to represent commercial interests in the Colorado River Management Plan planning process. GCROA's paid Executive Director organized a group of selected representatives of interested parties to present an alternative access plan to Grand Canyon National Park Planners. This group is called "Firewalk".

Some of the proposed solutions of FireWalk are:

- Non-commercial boaters will agree to travel on a schedule.
- Trips of 18 to 21 days will be eliminated since they are seen as the cause of campsite crowding.
- A reasonable level of motorized use is compatible with the Wilderness Act.
- Concessions services will give up some user days during peak (summer) months.
- Concessions services will expand commercial use into the shoulder season (spring and fall) to retain their total allocation.

The Wilderness Act clearly states that motors are not allowed in wilderness except in very limited circumstances (i.e. transportation to reach private property), whether its category is "proposed/study", "recommended", "potential" or "designated". Stay tuned to future Riverwires for more on the Wilderness Act.

You might be interested in Firewalk's participant list. They are:

- Mark Grisham, Executive Director, Grand Canyon River Outfitters Association
- Les Hibbert , Wilderness River Adventures
- Richard Quartaroli, President, Grand Canyon River Guides
- Drifter Smith, Board of Directors, Grand Canyon River Guides
- Jason Robertson, Access Director American Whitewater & Board Member, Grand Canyon Private Boaters Association,
- Richard Martin, President, Grand Canyon Private Boaters Association
- Destry Jarvis, Retired National Park Service
- Tom Robison, Director of Government Affairs, Grand Canyon Trust
- Earl Perry, non-commercial boater, retired River Ranger
- Ben Harding, non-commercial boater, river activist
- Jeffery Cross, Science Center Director, Grand Canyon National Park
- Linda Jalbert, Recreation Planner, Grand Canyon National Park.

Is your voice represented here, or do you feel non-commercial boaters have given up too much access and wilderness protection already? Firewalk's scenario could be a reality without YOUR HELP. Please take a few minutes to consider the issues and get

involved. Grand Canyon needs your help to protect it from self-serving commercial interests seeking to hurry up your Grand Canyon experience. Your comments are accepted through September 20, 2002. You can send comments or make them in person at one of the 4 scoping sessions.

To comment by mail, send your thoughts, along with your name and address, to:
CRMP Team
Grand Canyon National Park
PO Box 129
Grand Canyon, AZ 86023
or by email: grca_crmp@nps.gov

or attend one of 4 public scoping meetings. For more information on these sessions, visit www.nps.gov/grca/crmp

RIVERWIRE is a free service to the boating community from River Runners For Wilderness. Participation is FREE (and required!). Send your e-mail address to riverwire@rrfw.org and we'll add you to the RRFW RIVERWIRE e-mail list. RRFW is a project of Living Rivers. Visit our website at www.rrfw.org

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LR Letter 07/12/02
Response to Earl Perry

Hi Earl,
I appreciate your letter. It was not our intent to anger you. Our intent is to advocate for ecological integrity of the Colorado River. Here is what the CRMP of 1989 states as its first goal.

"To preserve the natural resources and environmental processes of the Colorado River corridor and the associated riparian and river environment."

It is really too bad that the Park Service has decided to take a backward step in this regard. What I, and others, see is an RMP that is being driven by human recreation issues. It is fine for recreation to be a component of the RMP, but not when it excludes biological integrity.

I am involved with Colorado River issues because a world class ecosystem is about to collapse. I see the potential for the ecosystem to be destroyed by an upstream dam built in Navajo sandstone. I will not be accountable for the continuation of a river management scheme that dismisses biological impairment. Four of eight native fish are already gone and two more are on their way; native insects are gone...you know how bad it is. The Organic Act compels the Park Service to act. It's not and so I will. The river must come first, our recreation on it second. I'm pleased that a growing number of river runners are joining me in adopting such an ethic.

Furthermore, the dam does tie into recreation issues too. This pertains to the sediment problems related to the reservoir arms at San Juan and Cataract Canyons. It's a mess out there now, creating huge problems for private and commercials alike. Such problems won't be addressed by GCNP as they are in GCNRA's basket, but they should be part of a greater boating community voice for a natural and free flowing Colorado through Cataract, San Juan, Glen an Grand Canyons.

As regards to Dave Brower (during our phone conversation). His stamp on the betterment of this planet is sound regardless of the Glen Canyon fiasco. Hindsight is 20/20. This is no single-minded issue, other than those who choose to focus on trying to get the old pretty pictures back. It's about the restoration of the most developed river in the world. It's about the tremendous waste of water and energy resources. It's getting water back to Mexico, and yes, it's also about saving the Grand Canyon. I don't care if I take another Grand Canyon River trip, but I do care if we continue to lose its native ecosystem. Others here have never even been down it, and are fighting just as hard to put the ecosystem first. Glen Canyon Dam is a key part of this, and must be addressed by the management plan. I hope you will join us in the call.

John

LR in the News 07/14/02

In Drought-Parched Arizona, Some Areas Drink Deeply

By MICHAEL JANOFSKY for New York Times

PHOENIX, July 11 -- This should be the so-called monsoon season here, when moist Pacific air brings afternoon thundershowers. But only a trace of rain has fallen since Arizona's devastating wildfires were finally contained last week, providing little relief from a statewide drought now entering a fourth year.

The lack of rain and snow has depleted ponds and reservoirs, parched ground cover, killed herds of livestock and cost hundreds of millions of dollars in agricultural revenue. The Bush administration recently declared Arizona a drought disaster area, making many farmers and ranchers eligible for low-interest loans and other aid.

"People out in the fields and people in the high country all tell me the same thing," said Ken Evans, president of the Arizona Farm Bureau, an organization of 15,000 members. "This is the worst drought in Arizona since the white man came here," hundreds of years ago.

But in a desert state that relies on its federally mandated water allotment from the Colorado River to support its rapid growth, a drought does not mean water shortages everywhere.

While ranchers in many areas are selling thousands of animals to prevent death by dehydration and some rural counties are having water trucked in, residents of Phoenix and Tucson, the state's largest cities, are free to wash their cars, soak their lawns and fill their swimming pools.

Indeed, only a few communities, like Flagstaff and Pine, have any water restrictions. Most everywhere else, water parks are open and new residential and golf course developments are forging ahead on schedule. Irrigation flows uninterrupted to alfalfa, citrus, cotton and vegetable crops in Yuma County and elsewhere. In fact, these are boom times for alfalfa growers o with grazing lands parched, cattle ranchers have been forced to buy stockpiles of feed for their hungry animals.

The reason for such disparity is the way water is delivered. The largest source is the Colorado River, which supplies Phoenix and other communities as well as farmers. Other places draw from less reliable sources -- ground water, which is available everywhere in varying amounts, and lakes and reservoirs.

The steady flow of the Colorado, which also supplies water to six other states and Mexico through contracts first negotiated in 1922, virtually assures Phoenix and Tucson all the water they need. Those two cities get 53 percent of the Colorado River water flowing into the state.

Developers say abundant water in metropolitan Phoenix is a major reason Arizona has become one of the fastest-growing states.

"In the 1960's, 80 percent of water in the state was used for agriculture, and 20 percent for residents and businesses," said John Sullivan, a senior official with the Salt River Project, which manages water into the Phoenix area from the Salt and Verde Rivers. "Now, it's 80-20 the other way. Water is there for growth."

Environmentalists argue that such a strategy might only prolong droughts.

"The development industry is not inclined to educate citizens about water conservation because it actually doesn't use all the allotment it has and worries that if it doesn't use it now, it won't have it in the future," said David Hogan, spokesman for the Center for Biological Diversity, a Tucson environmental group.

For Mr. Hogan, and free-market conservatives, the subsidized water used by farmers is more offensive, especially for cotton, which he called "grossly water intensive, especially for a crop that receives massive subsidies in other parts of the country."

Stephen Moore, president of the Club for Growth, a pro-market political action committee in Washington, said removal of subsidies, allowing the price of water to rise, would eliminate shortages and be "the best way to encourage conservation."

In any case, conservationists say officials in drought-prone states are doing too little to prevent shortages. Lisa Force, program director for Living Rivers, a Western nonprofit group that works to restore waterways, said recent low-rainfall years in the Southwest may now be the norm, not aberrations, and states need to adapt. Arizona officials, she

said, "totally have their heads buried in the sand." In neighboring New Mexico, for example, which is entitled to only a small share of water from the Colorado River projects, water restrictions are widespread.

For now, Arizona officials say any argument over surplus and need cannot be resolved by the current water network. Don Lavelle, a spokesman for the State Department of Water Resources, said even if there were restrictions in Phoenix and other cities, the water saved could not be diverted to other arid areas, because no canals or pipelines have been built to reach them.

Droughts will always harm areas that depend more on ground water and runoff, he said. That is the case now, with rainfall at 10 percent of normal statewide and lakes and reservoirs well below 30-year averages.

"Some towns are always on the edge with water problems because of their location," Mr. Lavelle said, describing conditions that are even worse across the northern tier of Arizona, where underground geologic fractures make water tables less dependable even in the best of times.

Those areas have been affected the most by drought, the brunt of it borne by cattle ranchers, who make up about 40 percent of the state's annual $6 billion to $7 billion agriculture industry.

As grazing lands dry up, cattlemen are selling animals to out-of-state buyers or surrendering them to slaughterhouses at bargain prices. A recent survey by the Arizona Cattlemen's Association found that the drought depleted the cattle stock over all by about 20 percent since 1996, a loss of about 60,000 animals. State officials predict that an additional 47,000 animals will be lost this year.

As residents of northeast Arizona, Navajo Indians have also been hurt by the drought.

Alex DiNatale, the Navajo Nation hydrologist, said most of the reservation's 7,500 ponds have dried up, deep-water aquifers are empty and as many as 10,000 animals have died this year from dehydration, malnutrition and auto accidents that occur when animals eat roadside plants. Navajos have begun selling animals to auction houses.

One sheep, Mr. DiNatale said, might normally sell for $85, but some herders are selling sheep now for $7.50. "And that's a good option," he said.

Wildlife is suffering, too. Brian Wakeling, the big game management supervisor for the state Department of Game and Fish, said alarming numbers of wildlife are unable to survive the first few months of life. Survival rates for prong-horned antelope, normally up to 40 percent of those born, are under 10 percent in some parts of the state. The rate for elk, normally 40 to 50 percent, has fallen below 20 percent.

A land-management group, the Diablo Trust, has begun hauling hundreds of thousands of gallons of water into areas around Flagstaff to save as many animals as possible.

"We've never seen anything like this," said Mandy Metzger, the trust's director. "Every time we dump a load of water, 100 to 200 elk show up. It's a tinderbox out there."

LR in the News 07/30/02

Watering down Valley's lifestyle

The Arizona Republic

Go to an Arizona Diamondbacks game this summer and you might spot D-Baxter, the team's mascot, tossing you a T-shirt emblazoned with messages about using water wisely.

If you have kids in school, chances are at least one will bring home a brochure or a door hanger that offers creative ways to save water around the house.
And don't be surprised if you're strolling through Gilbert and you find yourself face to face with a giant blue latex water drop handing out blue fortune cookies filled with exhortations like: "Be in the know, save H{2}O."

What you won't find are the kind of mandatory water restrictions being imposed in other drought-stricken Western cities.

Even as runoff-starved reservoirs northeast of Phoenix fall to nearly record levels, triggering a Stage 1 drought based on a regional management plan adopted six years ago, Valley cities have decided not to require water conservation this year. Instead, they have opted to turn up the volume on informational programs already in place.

"We're in better positions to ride out a drought than most big cities," said Tom Babcock, chief water resource specialist for the city of Phoenix. "We're accustomed to not getting a lot of rainfall and the state has invested heavily in projects to impound water and then deliver it."

But while the Valley faces no immediate shortages - the canal importing water from the Colorado River is full and underground supplies are adequate for communities that rely on them - some people who monitor water use say cities need to consider the longer view, especially in a fast-growing desert prone to droughts.

"Major metropolitan areas don't think they need to worry about water," said David Bainbridge, coordinator of the environmental studies program at Alliant International University in San Diego. "They think there's plenty more they can take. But that does nothing to create a sustainable supply."

Lisa Force, Arizona program director for Living Rivers, said evidence is mounting that the region could be entering a prolonged dry spell, one that would leave the Southwest with less water for years to come.

The Colorado River, which offers metropolitan Phoenix a comfortable buffer from dry years, is running this summer at its second-lowest level on record.

If the drought persists through the fall and winter, some cities will face tough decisions next year. Salt River Project, whose reservoirs on the Salt and Verde rivers have been hard-hit by the lack of mountain snow, will decide in September whether to reduce allocations to its customers.

That could mean higher rates as providers turn to the more expensive water from the Central Arizona Project.

Meanwhile, Valley cities have adopted a nearly unanimous approach to water use: Preach conservation as a lifestyle, year in and year out and teach people to manage their water carefully whether there's a drought or a flood.

At the core is the "Water: Use It Wisely" advertising campaign, which started in Mesa and has expanded to include nearly a dozen communities.

"We were all sending out our own different messages before," said Karen Warner, a water conservation specialist for Scottsdale. "So we decided we need to send out the same message. It makes sense to unify."

Cities also develop their own programs. Among them:

- School programs, aimed at instilling a conservation ethic at an early age, one that kids can pass along to their parents. Avondale uses magic in its show to keep kids interested.
- Water audits, in which homeowners can learn how much water they use and how they can use it more efficiently. Scottsdale will attach a monitor to water meters if the residents ask and show them exactly where their water goes.
- Publicity campaigns, such as Gilbert's, which includes the giant water drop and the fortune cookies. The water drop, actually town employee Lisa Hemphill, has proved popular so far.
- Rebates for installing desert landscaping or low-water-use plumbing fixtures. Although many cities offer such rewards, Phoenix passed because they weren't cost-effective, Babcock said.

David Mansfield, Scottsdale's water resource manager, said his city and others have accomplished a lot without forcing residents to change their lifestyle. Raising awareness is an important first step.

"We've never had to go to a restricted- water-use environment," Mansfield said. "We don't see that as a necessity for our community. That doesn't mean we can't ever get there; this winter is an important winter for all of us."

Phoenix recently adopted a revised drought plan that would be triggered if conditions worsen and other cities are working to create similar plans. The goal, said Esmie Avila, a water resource analyst for Avondale, is to establish consistent drought measures so all of the cities can coordinate their response.

"We're not absolutely sure we need to do drought response," Babcock said, "but we want to be there so the city is leading instead of following. We're making all the preparations even while we're crossing our fingers we won't get there."

Republic writers Edythe Jensen and Yvonne Wingett contributed to this story.

Reach the reporter at shaun.mckinnon@arizonarepublic.com or (602) 444-8632.

Media Advisory 07/30/02

Grand Canyon native fish to launch Habitat Security Tour in Denver
Demanding National Park Service action to restore Colorado River

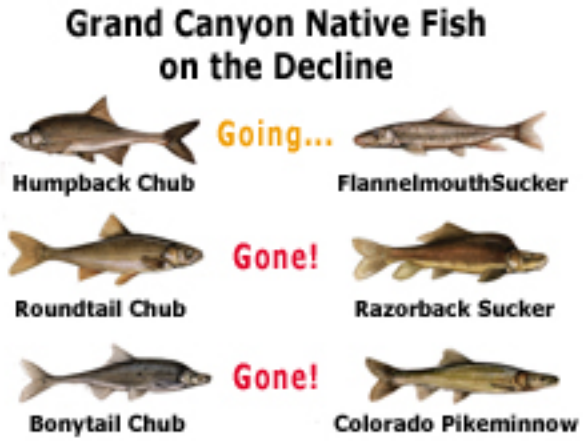
Contact:

Lisa Force: Living Rivers Denver Office, 303-237-2269/602-321-1753 mobile
Owen Lammers: Living Rivers Utah Office, 435-259-1063/435-260-2590 mobile

Endangered fish frustrated with the devastation of Grand Canyon's native ecosystem will participate in a National Park Service-sponsored public meeting on Thursday, August 1, 2002, 4:00-8:00 p.m., Community College of Denver Downtown Campus, Tivoli Student Union Conference Center, 900 Auraria Parkway (see below for more information). They will be demanding that the new Colorado River Management Plan now being developed by the Park Service make the security of their habitat its primary objective.

It's appalling that the National Park Service has ignored its principle responsibility to protect the natural integrity of this world renowned river corridor," says Lisa Force, program director for Living Rivers in Denver. "The Park Service has allowed Grand Canyon's entire food base to be altered, causing the loss of all native insect species, elimination of half the native fish species and the disappearance of mammals such as otters and muskrats."

Force and representatives of other environmental groups will be dressed as Grand Canyon native fish during the Denver meeting, and speak on behalf of the habitat loss these fish have experienced. Living Rivers will then take this habitat security message on the road to four other Park Service meetings on Grand Canyon taking place in Salt Lake City, Flagstaff, Las Vegas and Phoenix later in the month.



Fish which have gone extinct in Grand Canyon include the razorback sucker, bonytail chub, roundtail chub and Colorado pikeminnow. The humpback chub and flannelmouth sucker are in serious decline, as may also be the case for the bluehead sucker. The only Grand Canyon native fish believed to be surviving with sufficient numbers is the speckled dace.

"The Park Service has forgotten its mission, concentrating primarily on managing people while the habitat and native species these people come to visit disappear," says Ed Dobson, a Sierra Club board member. "Ever since the operation of Glen Canyon Dam upstream of Grand Canyon, Grand Canyon's river habit has been experiencing a long, slow death."

This decline is occurring because

- ninety five percent of the sediment and nutrients that once flowed into Grand Canyon is now trapped behind Glen Canyon Dam;
- seasonal flow fluctuations critical for building beaches and spawning habitat no longer occurs, and
- water released from the dam is nearly a constant 46 degrees F, whereas the native system requires temperatures in excess of 80 degrees.

"Whether impacts to the Canyon's ecological integrity result from activities inside or outside Grand Canyon, the Park Service is obligated by law to address them," adds Dr. Brent Blackwelder, President of Friends of the Earth. "Glen Canyon Dam is the major threat to the health of Grand Canyon, and reversing its impacts must be the core objective of the new river management plan."

Living Rivers, the Sierra Club and Friends of the Earth are part of a growing nationwide network of environmental and social justice groups calling for immediate action by the National Park Service and the Bureau of Reclamation, which operates Glen Canyon Dam, to reverse the ecological decline in Grand Canyon. Specifically these 85 groups are calling for:

- The restoration of natural sediment and nutrient flows from the main stem Colorado into Grand Canyon.

- The restoration of natural flow regimes to properly transport this sediment within Grand Canyon, when and where it belongs.

- The restoration of natural seasonally variable water temperatures in the main stem Colorado through Grand Canyon.

- Development of a restoration and recovery program for the Colorado River corridor in Grand Canyon that includes the recovery of all species known to be native to Grand Canyon prior to the operation of Glen Canyon Dam.

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Directions to Community College of Denver in downtown Denver: From I-25 exit on Auraria Parkway. Auraria Campus is on your left. (Pepsi Sports Center is on your right.) From I-70, exit onto I-25 SOUTH, then exit on Auraria Parkway. Tivoli Student Union has a tall smokestack. Parking for Tivoli Student Union surrounds the building and is $1.25 per half hour; however if you let them know you are there for the NPS meeting they should validate your parking. For additional information regarding location and parking, call (303) 556-2600. (For those coming from out of town, Aurora is an east suburb of Denver and has nothing to do with Auraria Campus.)

Other stops to include:

<u>Tuesday, August 6, 2002, 4:00 p.m. - 8:00 p.m.</u>
Salt Lake City, Utah
Salt Lake Community College-Miller Campus
Miller Training & Conference Center
9750 South 300 West

<u>Thursday, August 8, 2002, 4:00 p.m. - 8:00 p.m.</u>
Flagstaff, Arizona
Coconino Community College Commons
2800 S. Lone Tree Road

Tuesday, August 13, 2002, 4:00 p.m. - 8:00 p.m.
Las Vegas, Nevada
University of Nevada Las Vegas
Moyer Student Union Building
4505 Maryland Parkway

Thursday, August 15, 2002, 4:00 p.m. - 8:00 p.m.
Mesa, Arizona
Mesa Community College
Kirk Center-Navajo Room
1833 W. Southern Ave.

River News 07/30/02

Colorado River Management Plan Talking Points

Preserve and protect wilderness character of the Colorado River unimpaired for future use and enjoyment as wilderness.

The NPS asks "What would we choose to have the river be like in the future." Twenty two years ago the Park Service, with overwhelming public support, proposed the Colorado River in Grand Canyon for Wilderness designation. Until Congress acts on the proposal, the agency is required to provide the same level of protection for "proposed wilderness" as congressionally designated wilderness. What should the river be like in the future? *Tell the Park Service the river should be forever Wilderness!*

Park Values
The Park Service again asks, "will natural and cultural resources be in the same condition they are today or will they be different in the future?" Laws applicable to Grand Canyon National Park demand protection of natural and cultural resources. *The agency should protect all of the great Park's intact biological communities, natural process, and archeological treasures.*

The Experience
The Park Service wants to know what river trips should be like. Tell the agency to provide recreational opportunities consistent with the preservation of the river's natural and cultural resources and wilderness character. *Tell them to provide outstanding opportunities for solitude and a primitive recreational experience without the use of motorboats.*

The experience offered should reflect the unique character of the Grand Canyon - our country's longest whitewater wilderness. The roar of a rapid, the quiet trill of a canyon wren, and relaxed conversation, in concert with the river's flow are part and parcel of the wilderness experience. Such tranquility should not drown in clamor of crowds or the racket of an outboard motor.

Who Should Go?
Currently, the general public, citizens who don't need the corporate river outfitters, must wait up to 20 years to obtain a permit to run a river trip on their own. Profit obsessed concessionaires control over 70% of river access and offer expensive river tours generally costing more than Caribbean cruises of comparable length. These pricey trips remain beyond the reach of most Americans, including youth and educational groups. *Tell the National Park Service to reform its current concession services and provide fairer access and affordable trips to include a broader representation of citizens.*

Distributing use throughout the seasons would reduce crowding and congestion along the wilderness river. Providing fair and affordable access would not decrease the number of river runners, but it would increase our opportunity to enjoy an experience only the Grand Canyon wilderness can provide. *Tell the Park Service to provide us with a qualitatively better experience, a wilderness experience.*

Motorboats
Motors are generally prohibited in wilderness, as they should be. Motorboats are not as safe as oar-powered craft, nor do they provide economical trips as claimed by some river concessionaires. They simply generate higher profits for the corporations by crowding more people on noisy boats rushing through the Canyon. *Tell the Park Service to remove motors from the river.*

Helicopters
The use of helicopters should be limited to life and health-threatening emergencies, or essential administrative imperatives. Each season over 10,000 recreational passengers fly on or off the river by helicopter, creating a noisy, potentially hazardous carnival atmosphere within the Canyon's wilderness. All of this activity occurs near the base of Whitmore Trail, a mile-long trail offering alternative hiking and mule access the rim. *Tell the Park Service to eliminate noisy, intrusive helicopter passenger exchanges.*

Dam Operation
Glen Canyon Dam, located upstream of Grand Canyon National Park, dramatically impacted the Park's river corridor. Flow release decisions made by the interdisciplinary Adaptive Management Workgroup, ultimately constrained by electric power interests, have not always protected Grand Canyon's natural and cultural values. For example, the populations of endangered species, such as the humpback chub, continue to precipitously decline. The National Park Service must assume greater involvement and responsibility for dam operations. *Tell the Park Service to not pass the buck to agencies with less preservation conscience "for their consideration."*

LR in the News 08/01/02
Glen Canyon Dam in spotlight as NPS revises Grand Canyon plan

The Land Letter
Dan Berman

Environmentalists are preparing to push for the restoration of the Colorado River as the National Park Service holds its first public meeting today in Denver on its effort to revamp the environmental impact statement for the Colorado River Management Plan for Grand Canyon National Park.

NPS must complete the EIS by the end of 2004, and environmentalists are hoping it will address the perilous state of the Colorado River, especially the impact of Glen Canyon Dam, which is blocking nearly 95 percent of sediment and nutrients that formerly flowed down the river into the Grand Canyon.

"They need to address the ecological integrity of the river, and what the river needs right now is its sediment back," said Owen Lammers, executive director of Living Rivers.

Environmentalists say the dam is devastating the river and the Grand Canyon. Aside from the sediment issue, the water from the dam is released at 46 degrees Farenheit and does not reach the 80 degree level needed to maintain the habitat. This means native fish species like the humpback chub are harmed in favor of non-native species, environmental groups say.

"The Park Service has forgotten its mission, concentrating primarily on managing people while the habitat and native species these people come to visit disappear," said Ed Dobson of the Sierra Club. "Ever since the operation of Glen Canyon Dam upstream of Grand Canyon, the Grand Canyon's river habitat has been experiencing a long, slow death."

"The first thing we're looking for is for the park service to realize it needs to take on these issues," Lammers said. As for solutions, Living Rivers supports decommissioning the dam, but Lammers said BuRec could construct a truck bridge to haul sediment out from behind the dam as well as increase water flows from the river on a permanent basis.

As it stands, the Glen Canyon Dam Adaptive Management Work Group, a 25-member consortium of state and federal government agencies, Native American tribes, environmental groups, recreation interests and power companies recommended at its April meeting a test flood from the dam similar to one attempted in 1996.

But Lammers calls the test flow "a waste of time," adding that it will not have any long-term impact on the Colorado River ecosystem. "They can go and introduce a natural flow regime right now," Lammers said. "Doing this for a few hours is not what the system needs. It needs to be done 24-7-365." Lammers added the test flow only serves to give BuRec good publicity. "At least they can say 'were trying,' but the data indicates they've done this before and nothing has happened." Restoring the water flow from the dam to match the water entering Lake Powell is "something they can do tomorrow," Lammers said.

The test flow is subject to approval by Interior Secretary Gale Norton, who is expected to make a decision by the end of August, according to BuRec Spokesman Doug Hendricks.

Over 70 environmental groups signed a petition in June asking BuRec and NPS to restore the Colorado River and the Grand Canyon. "The demise of this canyon, one of the seven natural wonders of the world, symbolizes the unnecessary impacts brought upon rivers throughout the West by BuRec's environmentally and culturally destructive policies designed to optimize water delivery," the declaration said.

The groups called upon the federal government to: restore sediment and nutrient flows into the Grand Canyon, natural flows within the canyon, and more naturally variable water temperatures; develop a restoration and recovery plan for all Grand Canyon species; eradicate alien species that compete or prey on native species in the canyon; and define the Colorado River through the canyon as wilderness, thereby ending the use of personal watercraft.

Additionally, Living Rivers and other environmental groups are "well underway" in preparing legal action against the federal government for failing to address the declining Colorado River ecosystem. "The fact that the scoping process is underway is in no way impeding us from pursuing legal action on this matter," Lammers said.

LR Letter 08/01/02

Colorado River Management Plan: LR Scoping Comments

August 1, 2002
Joseph F. Alston, Superintendent Grand Canyon National Park P.O. Box 129 Grand Canyon, AZ 86023

Dear Superintendent Alston:

Living Rivers appreciates the opportunity to provide scoping comments for the Colorado River Management Plan (CRMP). This is a critical time in the ecological history of Grand Canyon's river corridor. The corridor has experienced extensive changes over the past 40 years, largely as a result of operations at Glen Canyon Dam. Some of these changes are causing potentially irreversible damage to this world-renowned ecosystem. As the National Park Service is the agency with the sole responsibility to protect the river's natural integrity for present and future generations, it is vital that the new CRMP outline strategies to reverse the damage that has been occurring and to restore the river's native habitat, species and natural processes.

The current CRMP, completed in 1989, states as its first goal, "To preserve the natural resources and environmental processes of the Colorado River corridor and the associated riparian and river environment." The Park Service has clearly failed in its efforts to fulfill this goal. The natural resources in the river corridor are now much worse off than before CRMP was developed. The principle fish species the Park Service and other agencies have been working to protect, the humpback chub, has declined more than 75% to just 2000 adult fish. Nothing has been done to address the need to recover

the four native fish that have become extinct in the canyon: razorback sucker, bonytail chub, roundtail chub and Colorado pikeminnow. The Park Service has also been negligent in ensuring that two other species, the flannemouth sucker and bluehead sucker, are not suffering the same fate.

This decline in native fish populations is just one indicator of the extensive ecological damage taking place in Grand Canyon's river corridor which the Park Service is neglecting. The entire food base for the river ecosystem has been dramatically altered. A green alga (cladophora) has displaced the natural carbon food base. None of the river's indigenous aquatic insects exist in the Canyon any longer. Otters and muskrats are now gone from the canyon and native riparian vegetation is disappearing from the high water zones or is stunted due to the lack of nutrients and the invasion of competing non-native plants. Most, if not all, of these changes are a direct result of the operations of Glen Canyon Dam. These changes include:

* Ninety-five percent of the sediment and nutrients that once flowed into Grand Canyon's riverine ecosystem are now trapped behind Glen Canyon Dam causing the beaches to erode away and the native vegetation to disappear, disrupting the historic food base.
* Seasonal water temperatures that previously fluctuated from freezing to 80 degrees Fahrenheit, now range from 43 to 55 degrees, eliminating the warm water temperatures necessary to trigger native animal reproduction and fostering non-native fish species at the expense of native species.
* Natural flows which fluctuated seasonally from 3,000 to 90,000 cubic feet per second now fluctuate only from 8,000 to 20,000, cubic feet per second, creating a near static flow regime for an ecosystem that is adapted to and dependent upon the dynamic pre-dam flow.

These changes represent a significant violation of the National Park Service's Organic Act (1916) which requires that the National Park Service preserve its lands unimpaired for the enjoyment of current and future generations. The lack of any substantive action of late also represents a violation of the intent of the 1992 Grand Canyon Protection Act.

The Organic Act and the establishment of Grand Canyon National Park pre-date the decision to construct Glen Canyon Dam. Whereas numerous alternatives exist to provide for the societal needs associated with Glen Canyon Dam, there are no alternatives to the unique ecosystem that is the river corridor through Grand Canyon National Park. Moreover, the Organic Act compels the Park Service to act even if impacts result from activities taking place outside its boundaries, as is the case with Glen Canyon Dam.

Grand Canyon National Park cannot abdicate to the Adaptive Management Work Group (AMWG) its responsibility for management decisions pertaining to the ecological integrity of the river corridor even when such decisions relate to Glen Canyon Dam outside park boundaries. It is the Park Service's responsibility to uphold the Organic Act, not the responsibility of the Bureau of Reclamation, Western Area Power Administration or any of the other AMWG participants. Furthermore, the AMWG has not demonstrated

an ability to provide any lasting benefits to the Grand Canyon ecosystem. As noted above, AMWG and the Park Service have failed in the principle mission to recover populations of humpback chub at the Little Colorado River. Populations in the Little Colorado River have declined 75% and no gains have been made in the establishment of a second population of humpback chub in the Colorado River mainstem. While the Park Service is fully within its rights to participate in the AMWG, the Park Service alone has the responsibility to ensure the future integrity of Grand Canyon's native river ecosystem.

As guardians of this critical component of world heritage, it is vital that the Park Service through the CRMP address all aspects of river management, especially the impacts to the integrity of the Park's native ecology caused by the operation of Glen Canyon Dam. Specifically, the CRMP must address mechanisms to:

* Restore essential sediment and nutrient flows from the mainstem Colorado River into Grand Canyon.
* Restore natural flow regimes to properly transport this sediment within Grand Canyon, when and where the sediment belongs.
* Restore natural seasonally variable water temperatures in the mainstem Colorado River through Grand Canyon.
* Develop a restoration and recovery program for the Colorado River corridor in Grand Canyon that includes the full recovery of all species known to be native to Grand Canyon prior to the operation of Glen Canyon Dam.
* Implement a non-native eradication program to minimize alien species in the Grand Canyon River corridor with a priority on those that prey on, compete with or otherwise impair the health of native plants and animals.

We recognize that there are a variety of issues which the Park Service may be asked to address within the CRMP. However, none can be more important than those which relate directly to the Park Service's mandate as prescribed in the 1916 Organic Act. Without the natural ecological integrity of the river which carved it, Grand Canyon itself loses its integrity as does the Park Service. The principle objective of the new CRMP must be the restoration and recovery of the natural processes and native species to Grand Canyon's river corridor.

Thank you for the opportunity to submit these scoping comments.

Sincerely,

Owen Lammers Executive Director

LR in the News 08/04/02

Critics: Canyon river plan ignores dam

By GARY GHIOTO for Arizona Daily Sun

Opponents of Glen Canyon Dam and supporters of wilderness designation for Grand Canyon National Park are outraged that the National Park Service isn't considering the issues in the revised Colorado River Management Plan.

Sue Gunn of The Wilderness Society says the Park Service is mandated to manage the river as wilderness -- that translates to no outboard motors.

That's because park officials recommended to Congress more than two decades ago that the river and more than 950,000 acres of Grand Canyon National Park be considered a wilderness area.

Though the designation is in legislative limbo, Park Service regulations are clear that until Congress acts, the river must be considered wilderness, Gunn said.

Grand Canyon National Park Superintendent Joseph Alston said no action will be taken on the wilderness designation until Congress acts. He said the river corridor will be managed under current backcountry regulations that protect natural and cultural resources.

"We did agree to look at the issue of motors versus nonmotors and that's sort of central to the whole wilderness issue as it relates to the Colorado River corridor through Grand Canyon," Alston said. "So we will tackle that issue and the outcome of that will, in large part, direct how the river is viewed in terms of wilderness as it relates to the backcountry management plan."

Gunn said that's not enough.

"That's pretty myopic and I think it shortchanges the American people in terms of that experience of being on that river," Gunn responded. "I personally think there is a concerted effort inside the Park Service to eviscerate the wilderness program."

The Wilderness Society, the National Parks Conservation Association and the Arizona Wilderness Coalition were among a dozen conservation groups who recently wrote Park Service Director Fran Mainella and criticized the management plan process.

The groups said holding public meetings in five Southwestern cities is "unfair to the American public" and limits the range of discussion on the pending management plan. Meetings should be scheduled in Los Angeles, San Francisco, Washington, D.C., and New York City, Gunn said.

"The Grand Canyon is a national, an international icon. When you talk about parks ... the average American thinks of the Grand Canyon. I get the feeling this is a skewed setup," Gunn said.

Alston said there is plenty of opportunity for people on the East and West coasts to comment on the plan. Letters and e-mails are being accepted by the Park Service on a special Web site and an extensive mailing list also will solicit comments, he said.

Meanwhile, groups like Living Rivers, which wants Lake Powell drained, and the Flagstaff Activist Network are blasting the Park Service's decision not to consider the environmental impact of Glen Canyon Dam in the management plan.

Owen Lammers, executive director of Living Rivers, said ignoring the consequences of Glen Canyon Dam is a "death sentence" for the river and endangered species like the humpback chub. FAN and Living Rivers says the Park Service must "assume greater involvement and responsibility for dam operations."

Alston said the dam, which is run by the Bureau of Reclamation, is "outside the scope" of the Park Service and the management plan.

"They're choosing the wrong forum. We don't have the discretion to change the operation of the dam or the flow rate of the dam," he said.

On the Net:

The Wilderness Society: www.wilderness.org

Living Rivers: www.livingrivers.net

Flagstaff Activist Network: www.flagstaffactivist.org.

LR in the News 08/09/02

Hundreds Float River Ideas

Thursday's Colorado River Management Plan meeting draws a packed house over motors, permit, and wilderness.

By Gary Ghioto for Arizona Daily Sun

Hundreds of Flagstaff-area residents came to Coconino Community College Thursday to speak out on a pending National Park Service plan to manage the Colorado River for the next 20 years.

Grand Canyon National Park officials are trying to determine who should get access to the river, whether motorized rafts and boats should continue to ply the river, and how to divvy up trips between commercial and private boaters.

The crowd featured the full spectrum of the Colorado River community: owners and guides from commercial rafting and boating companies, do-it-yourself river runners, environmentalists and wilderness advocates.

Flagstaff is home to many of the commercial outfitters who carry rafters down the river, and they were out in force to defend their permit allocation and right to use motors. Public comments gathered in Flagstaff and from other sessions in Salt Lake City, Denver, Las Vegas and Mesa will be included in the National Park Service's environmental assessment that will be released in 2004.

"We had a reasonable turnout in Denver, a good turnout in Salt Lake City and this looks like another good turnout," said Joseph F. Alston, superintendent of Grand Canyon National Park, as he fielded questions from people attending the meeting.

Alston said the issues in the meetings have revolved around the allocation of permits for private and commercial boaters, the use of outboard motors on the river and the long waiting list for private permits.

"We've heard a lot and we're giving serious consideration to a lot of good ideas," he said.

National Park Service staff and posters provided detailed information about how permits are issued for the 23,000 private and commercial boaters each year. They also took comments from the public about the fate of motorized travel on the river and the use of helicopters to ferry river runners back and forth to Las Vegas.

19-Year Waiting List

Park officials say the average wait for a private trip is 19 years. The waiting list is an emotion-laden issue between commercial and private boaters. Currently commercial outfitters receive 70 percent of river permits granted by the Park Service.

"I registered in 1990 and my trip came up in 1999. I got on when I was a graduate student and I didn't get my trip until I was a tenured professor," said Willie Odem, past president and current board member of the Grand Canyon Private Boaters Association.

Now Odem, a NAU professor who teaches environmental engineering, is back on the list and faces a 20-year wait.

"Part of the problem I think is that the allocation has to be shifted. But also the Park is the only agency in the country that uses this waiting list system. It's a horrible system to distribute access. It's an abomination," said Odem.

The association favors a 50-50 split of permits with commercial operators and an end to the waiting list by using a reservation system that guaratees a launch date for permit holders.

Mark Grisham, executive director of Grand Canyon River Outfitters Association, which represents the 16 firms that run Colorado River trips, acknoledged that the waiting list is flawed and should be abolished.

But figuring out how to divvy up the percentage of river permits won't be easy, said Grisham.

"Our feeling is that the private boaters community has not developed a compelling case that the current allocation system is wrong or incorrect," he said.

"You should ask them what is the basis that the National Park Service should make this decision? What is the criteria that the Park Service should use to compute the outcome and how is that criteria measured in comparable terms? When you get into that, you learn very quickly that those are very difficult questions to answer," said Grisham.

The outfitters favor a reservation system that sets "reasonable" requirements for permit applicants to follow. River runners should select a date, detail the size of the group going, identify the people in the group and put down a refundable security deposit.

The system discourages people who apply for a permit and have no serious intention or resources of going down the river.

Regarding outboard motors on the river, Grisham said motorized trips provide a high level of public access because of their shorter duration than regular float trips that can take up to 18 days.

"There's just a whole lot of people in this country who are not going to do this experience without motorized trips. They're not going to have two weeks of vacation time to come down and there is also a lot of people who are not comfortable on row boats," he said.

The advent of quieter engines and continuation of non-motor months on the river should defuse complaints over motors, he said.

Odem said the Grand Canyon Private Boaters Association favors phasing out engines over five years to give commercial outfits time to recoup their capital investment.

River Ecosystem Off the Table

Meanwhile, off the table for discussion at the meeting, much to disappointment of environmental groups, is the impact of Glen Canyon Dam on the river's endangered fish species, beaches and wildlife habitat.

Protesting that decision in classic guerilla theatre was one Owen Lammers, executive director of the environmental group Living Rivers of Moab, Utah.

Wearing a realistic headpiece depicting the extirpated razorback sucker, Lammers greeted hundreds of people entering the spacious Coconino College administration building Thursday afternoon.

Lammers and two other colleagues, one wearing an endangered humpback chub hat and another walking around inside a rubber raft and wearing an outboard motor on his head, provided comic relief to the session.

But the message from Living Rivers, a group organized several years ago with a mission to restore the Colorado River and remove Glen Canyon Dam, had a serious edge.

"We're trying to ensure that people who come to these meetings are fully aware that there is a critical issue in terms of the ecological integrity of the river corridor. Given that this is a management plan it seems logical that they would address the ecological integrity because it's in such serious decline," said Lammers.

The Glen Canyon Dam has changed river flows, eroded beaches and chilled the Colorado River water, with the result that native fish, which evolved in sediment-rich, warm waters, are either extinct or declining rapidly, he said.

Alston said the Glen Canyon Dam is out of the scope of the management plan and that the Park Service has no authority to dictate its operation.

Lammers disagreed.

"They're trying to sidestep the issue. The Park Service is the number one agency responsible for the ecological integrity of the river. They're trying to shuffle it off to the Bureau of Reclamation. They can't do that," he said.

Also off limits for the plan is discussion of merging the Colorado River Management Plan with a proposal to declare the 277-mile river corridor through Grand Canyon National Park as wilderness.

The Park Service recommended the river and nearly 1 million acres of the park be classified as wilderness. But until Congress approves a wilderness bill, there will be no merging of the wilderness in the plan, said Alston.

Tom Martin, a member of River Runners for Wilderness, said the Park Service is mandated to manage the river as a wilderness and restrict motors and excessive use of natural resources.

"When I walk around this room, what I see missing is anything to show that the park has to manage the river for its wilderness values and character," he said.

Additional public comment sessions on the Colorado River Management Plan are being held in Las Vegas on Aug. 13 and in Mesa Aug. 15. Comments can also be left on the Colorado River Management Plan Web site: www.nps.gov/gcra.crmp.

LR in the News 08/16/02

Phoenix papers on final CRMP meeting

Colorado River enthusiasts voice concerns

By Mary Jo Pitzl for The Arizona Republic

MESA - They came in shorts and sandals, skirts and T-shirts, fish heads and sarongs. People with an interest in how the Colorado River should be managed through Grand Canyon National Park milled about a conference room at Mesa Community College on Thursday evening.

The fish heads were oversized hats worn by members of Living Rivers, a group that is pressuring park officials to take into account how Glen Canyon Dam has imperiled various fish species.

Others came to weigh in on how to best allocate trips along the Colorado's 250-mile path through the Canyon.

Gaylord Staveley, in his 45th year of river-running, said park officials should freeze the waiting list for private boaters and figure out a better way to get those people on trips.

Staveley, who runs Canyoneers, a rafting company, said the problem is not that commercial operators get too many of the river's "user days" but that the park has lost control of how to best handle go-it-alone boaters.

Private boaters complain that they face waits of 19 to 20 years for a river trip and are pushing for a more equitable split of the coveted user days.

The Arizona Wilderness Coalition wants park officials to phase out motorized watercraft, which commercial operators oppose.

The coalition's Don Hoffman predicted that the loss of motors wouldn't dry up demand for river trips. "The oar trips are fuller than the motorized trips," he said.

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Private boaters call for more permits to raft Grand Canyon

Scott C. Seckel
East Valley Tribune

The struggle for a chance to raft the Colorado River through the Grand Canyon dominated a meeting in Mesa held by park officials Thursday.

The system now in place–which dates back to the late 1960s–favors commercial outfitters. Out of 120,000 river days available, outfitters get 115,500 and private boaters get 54,450.

To get a private rafting permit, boaters put their names on a waiting list which now takes about 20 years to climb.

Private boaters want more permits set aside for them. John Dole, a Mesa resident and partner in a river gear rental company called Riverproff Outfitters, said he doesn't think the permit system is fair. "it's still skewed mightily to the commercial boaters," Dole said.

Outfitters at the meeting said that they wanted to preserve their livelihood and ensure that people without the equipment and skill can enjoy what all sides say is the experience of a lifetime.

Rob Elliott owns Arizona Rafting Adventures, a Flagstaff-based outfitting company. He said he wasn't worried about his business being affected–he said he could retire if he wanted to–but he wants "a fair process that will serve all sectors of the public."

A host of other issues were raised by a crowd of about 250 who attended the four-hour meeting, such as motors or no motors on boats, wilderness or recreational area at the Canyon, and what about saving rapidly disappearing native fish?

The meeting was one of a series being held around the West this summer to gauge public opinion on river corridor management. Current policies will be changed in about two years by a regional National Park Service director after public input.

Environmentalists protested the recreational focus of the meetings. Four native fish are extinct in the stretch of the Colorado running through the Canyon, according to Owen Lammers, executive director of the Scottsdale-based environmental advocacy group.

"What good is a river trip if they've lost the ecological integrity that made it a national park in the first place?" Lammers said.

River News 08/22/02

RRFW Riverwire - GRAND CANYON SCOPING ADDS 2 CITIES

GRAND CANYON NATIONAL PARK EXTENDS PUBLIC MEETING SCHEDULE IN REVISION OF COLORADO RIVER MANAGEMENT PLAN

On the heels of five successful open house meetings in cities throughout the West, Grand Canyon National Park Superintendent, Joseph F. Alston, today announced the Park's intent to conduct two additional public meetings in the San Francisco/Oakland and the Washington, D.C./Baltimore areas. Meeting dates and locations are forthcoming and will be posted on the Colorado River Management Plan (CRMP) Web page www.nps.gov.grca/crmp

Meetings in Denver, Colo.; Salt Lake City, Utah; Flagstaff, Ariz.; Las Vegas, Nev.; and Mesa, Ariz. were held during the first two weeks in August and drew attendance from approximately 850 people. To date the Park has received more than 3,000 comments via various public involvement venues, including the Internet, mail, hand-delivered letters and the open houses. “We were very pleased with the attendance at the open house meetings,” Alston said. “The format lent itself to helping everyone realize the complex issues we face as we prepare the draft environmental impact statement (EIS).

There was a lot of discussion we hadn’t heard in the public involvement phase before.” Alston said these meetings were added to give the public, interested organizations and agencies further opportunity to interface with Park staff, have their questions answered and submit comments. “Many other governmental agencies work with the Grand Canyon National Park,” Alston said. “The final results of this EIS could affect their dealings with the Park, so there is a lot of interest there.”

In June the Superintendent announced the initial meetings, the first stage in preparing an EIS to update the CRMP for Grand Canyon National Park. The National Park Service (NPS) is preparing the EIS for the Plan under the provisions of the National Environmental Policy Act (NEPA) of 1969.

The purpose of this EIS is to update management guidelines for the Colorado River corridor through Grand Canyon National Park. Current guidelines can be found in the 1989 CRMP. A copy of this plan, as well as background information and public comments received from past CRMP discussions, can be found on the Internet at www.nps.gov.grca/crmp.

In developing a draft CRMP/EIS, the NPS seeks public input to reaffirm previously identified agency and public issues, and to identify any new public issues and concerns. Scoping information will also be used to help narrow and define the significant environmental issues and management alternatives to be analyzed in the EIS. Public input will continue throughout the planning process. The NPS will actively seek out and consult with all interested members of the public.

During this process, the NPS will develop and evaluate alternatives to address resource protection issues, potential resource impacts, user capacities, and mitigation measures necessary or desirable to achieve the NPS mission. The NPS will review some key resource issues outside of the park’s boundaries that affect the integrity of the Grand Canyon and will consider alternatives that include no-action (the status quo), no motorized use, and varying levels of motorized and non-motorized watercraft use.

Issues to be addressed in the EIS will include, but are not limited to:

- appropriate levels of visitor use consistent with natural and cultural resource protection and preservation mandates;
- allocation of use between commercial and non-commercial groups;
- non-commercial permitting system;
- level of motorized versus non-motorized raft use;
- the range of services and opportunities provided to the public; and,

- in consultation with the Hualapai Indian Tribe and other appropriate parties, the continued use
- of helicopters to transport river passengers from the Colorado River near Whitmore Wash.

Information about this planning effort and how the public can be involved throughout the process can be found in Soundings, a newsletter available on the Internet at www.nps.gov.grca/crmp. Due to the public interest in this planning process, the NPS has decided to extend the public comment period until November 1, 2002. Comments can be submitted by any one of the following ways:

- mail to CRMP Project, Grand Canyon National Park, P.O. Box 129, Grand Canyon, Arizona 86023;
- send by electronic mail to grca_crmp@nps.gov;
- hand-deliver to Grand Canyon National Park; or
- provide at one of the public scoping meetings to be announced.

Completion of the EIS process will fulfill an agreement reached through a negotiated settlement of recent litigation between several organizations and individuals and the federal government. The settlement requires the NPS to complete this EIS by December 31, 2004. The NPS plans to restart the process to review and revise the park's 1988 Backcountry Management Plan subsequent to the completion of the CRMP. For further information on this planning process, please contact Jeffrey Cross, Director, Grand Canyon Science Center at 928-638-7759.

To be placed on the park's CRMP Newsletter mailing list, please send your request along with your email address to: grca_crmp@nps.gov.

RIVERWIRE is a free service to the boating community from River Runners For Wilderness. Participation is FREE (and required!). Send your e-mail address to riverwire@rrfw.org and we'll add you to the RRFW RIVERWIRE e-mail list. RRFW is a project of Living Rivers. Visit our website at www.rrfw.org.

River News 08/28/02

RRFW Riverwire - GUNNISON GORGE MANAGEMENT PLAN UPDATE

August 29, 2002

This year, the Bureau of Land Management's Gunnison Gorge National Conservation Area has begun a new recreational management planning process. An on-river focus group was held August 19-20. Jo Johnson of River Runners for Wilderness also represented the Grand Canyon Private Boaters Association, Colorado Whitewater Association, and private boaters in general, on the trip and and at a meeting in Montrose the following evening. Steve Christianson, GCPBA member from Utah, and

members of the Western Colorado Congress, an environmental & community group which has been very involved, also represented non-commercial interests. Local non-commercial boaters have not been heavily engaged in the planning process.

While the Gorge's 6 river outfitters, 2 walk-in fly fishing outfitters and the horse packing outfitter are good stewards of the Gorge, the river outfitters want to change current rules to get more launches, allow larger group sizes, and to limit private boater access.

In his keynote speech, noted author, teacher, and river runner Rod Nash urged participants to avoid the type of planning mistakes Grand Canyon National Park made 30 years ago and is still dealing with, and to remember that "Wilderness is a state of mind".

The outfitters suggested:

- A permit system for privates ostensibly for educational purposes, but not necessarily to limit private boater access. Currently, the fee demo form serves as a permit of sorts. Private boaters sign an agreement on the back to observe standard river rules (fire pan, toilet, etc.).
- A limit on private boater and fisher access, particularly during stone fly hatch/high water, with no decrease or possibly even an expansion in commercial launches. Currently, there is no limit on private boaters/fishers although BLM's target maximum is 75 people. During about 10 days in June the limit is exceeded, sometimes by quite a bit.
- 50 to 100% more launches for outfitted services. A large portion of commercial launches go unused, and outfitters say there is not enough flexibility in scheduling launches. Outfitters have a total of 2 launches per day, but are free to trade launches among themselves.
- Larger group sizes than the current 12 (which includes guides) (a number supported by the BLM's campsite survey) because commercial vans carry 15 passengers.
- To change their permit renewals to avoid the Chaffee/Gunnison County entertainment tax which is calculated on permit term.
- To keep outfitter permit renewals at 5 years so they don't have to go through a re-bidding process every year.

For those unfamiliar with the Gunnison Gorge, it is a 14 mile run through a small designated wilderness downstream of the Black Canyon of the Gunnison. The road stops 1 mile above the Gorge at Chukkar Trail, and gear is horse packed and backpacked in from there, which does limit access. Camps are reserved at the put in: first-come, first- served. While the camps do look very used, the corridor is clean and pristine, and the whitewater is technical (up to class III-IV). Boaters and hikers use different campsites.

Private boater representatives made these points in response to outfitter proposals:

- Rules should be applied evenly across sectors. For example, there should be no reserving of bigger camps for commercial use only as is now being done elsewhere, is not fair to non-commercial boaters.
- Permits have historically led to limits on access. Non-commercial boaters are, for the most part, acting responsibly, so why impose more restrictions on their access, especially in light of commercial use allocations presently going unused?
- Because demand cannot be measured, the only fair way to distribute access is by having all boaters stand in the same line to reserve space on the river. They chose how they go after making their reservation. A new paradigm for access is needed—it is unfair and unrealistic to limit non-commercial boating when 35% to 50% of commercial launches have gone unused in each of the last 9 years.

Karen Tucker, BLM Gunnison Gorge Manager, is spearheading a truly impressive effort to include all stakeholders and all points of view. If it is humanly possible, the result will be a finely crafted plan that protects the resource and truly reflects the public's wishes on recreational issues. The BLM has hired a planning contractor, Tetra Tech of Boulder, to assist with the effort.

To get more information or comment on the plan, please visit their website at www.gunnison-gorge-eis.com. Comments need to be made as soon as possible.To get more information about the area and see a great slide show of the gorge, visit www.co.blm.gov/ggnca.

You can also contact Jo Johnson at jo@rrfw.org for more information. RIVERWIRE is a free service to the boating community from River Runners For Wilderness. Participation is FREE (and required!).

Send your e-mail address to riverwire@rrfw.org and we'll add you to the RRFW RIVERWIRE e-mail list. RRFW is a project of Living Rivers. Visit our website at www.rrfw.org

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River News 08/29/02

OAR TRIPS JUST AS SAFE AS POWERBOAT TRIPS IN GRAND CANYON

Reprinted from The Wilderness Society Fact Sheet, August 2002
For the past 50 years, concessionaires have dominated access to the Colorado River. By switching overwhelmingly to powerboat tours, they are pushing visitors down the canyon at an accelerated pace to improve their profits. However, racing through the canyon diminishes the wilderness experience of the river. Concessionaires currently hold 80% of the permits, and are responsible for increasing the congestion and noise. The National Park Service is starting a new Colorado River Management Plan. This process provides an opportunity to restore the wilderness qualities of the Colorado River.

MYTH - The concessionaires claim that a powerboat tour is the only safe way to experience the Colorado River.

REBUTTAL - This is simply not true; perpetuation of this myth helps concessionaires maintain their control over Colorado River management. Oar trips on the Colorado River are as safe, if not safer than powerboat tours. The fact is that “commercial motor trip fatality frequency is 2.7-fold higher than that on commercial oar-powered trips .” Scientific studies have proven that a motor does not protect you from injuries in the Grand Canyon. Rafting the Colorado River is safe; here are the facts on injury and mortality on Grand Canyon river trips.

- Overall, running the Colorado River is not a risky endeavor. The chance of injury during Colorado River trip is very low. Current risk is 2.36 injuries per thousand and mortality risk is 0.004 percent.(1)
- Studies indicate that the lower risk of fatality on oar-powered rafting trips may be influenced by the passenger:guide ratio. This ratio is much lower on oar-powered rafting trips than on powerboat tours. Therefore, the oar-powered trips are safer since a lower passenger:guide ratio results in better supervised passengers and less chance for injury.(2)
- The most deadly hazard in the Grand Canyon is heat illness. It can strike visitors anywhere in the canyon, but most cases of heat stroke occur in visitors hiking in the National Park backcountry and not on river trips.(3)
- Studies of injuries have found that there is no difference in injury rates between commercial (primarily powerboat) tours and self-guided (primarily oar) trips.(4)
- Injury frequency on Grand Canyon rafting trips is very low. A passenger has a greater overall injury risk playing golf than rafting the Grand Canyon.(5)
- The mean age of injured passengers was lower than the mean age of passengers. Therefore, elderly passengers are not at any greater risk of injury; no matter what type of rafting experience they choose.(6)
- The majority of reported injuries occur while the rafters are engaged in off- river activities. Therefore, playing, hiking, drinking alcohol, etc around camp is more dangerous than running the river on a commercial oar trip.(7)

References:

1. Myers, Thomas M.; Christopher C. Becker; and Lawrence E. Stevens. Fateful Journey: Injury and Death on Colorado River Trips in Grand Canyon. Flagstaff, AZ: Red Lake Books, 1999. p. 135.
2. Ibid. p. 158.
3. Ibid. p.135.
4. Ibid. p. 39.
5. Ibid. p. 113.
6. Ibid. p. 58.
7. Ibid. p. 137.

River News 08/30/02

WHO RAFTS THE COLORADO RIVER THROUGH THE GRAND CANYON?

Reprinted from The Wilderness Society Fact sheet, August 2002.

Proponents of powerboat tours through the Grand Canyon insist they are necessary to provide the majority of the American population access to the river. However, the facts show that all ages can enjoy self-guided rafting trips and that pricey powerboats tours are only available to the wealthy few.

Commercial passengers hire a rafting company to take them through the canyon. The company rows (or powers) the boat, takes care of navigation and trip preparation, cooks the meals, and is responsible for first aid. In contrast, self-guided trips generally are 'led' by a person with extensive rafting experience, often on the Colorado River, and the group shares responsibility for rowing, navigation, cooking, and first aid. The vast majority of self-guided trips are oar-powered.

The Park Service and Bureau of Reclamation have commissioned several studies to look at the differences between these user groups. The studies were then used for determining permit allocation on the river. Based on this information, here are some facts about the user groups:

The studies revealed:

- Forty seven percent of commercial passengers have a household income over $100,000 while only 12% of the national population have a household income over $100,000. The household income of self-guided boaters in very close to the national average (within 5%).(1)
- A motorboat tour of the Grand Canyon costs ~$300/day, a steep price tag for the average American.(2)
- Currently, 24% of powerboat tour passengers, 74% of oar-powered commercial passengers, and 85% of self-guided boaters believe the canyon would be more of a wilderness if motors were phased out.(3)
- Age is not an impediment to enjoying an oar-powered journey. Both passengers on commercial tours and self-guided rafters range in age between 10 to 82 years old.(4)
- Most commercial passengers do not experience the full Grand Canyon, entering or leaving the river trip at Phantom Ranch or by helicopter at Whitmore Wash . In contrast, all self-guided boaters take the time to experience the entire canyon.(5)

- Self-guided paddlers and commercial oar passengers tend to experience more of the wilderness qualities of the Grand Canyon by staying longer at attractions and spending more time on the river.(6)

References:
1. Jonas, Lilian. “Historic Profile of Colorado River Users: An Overview and Integration of Existing Data.” Submitted to Grand Canyon National Park, Grand Canyon Science Center – Research Office.
2. 1998 Shelby study
3. Ibid.
4. Myers, Thomas; Christopher Becker; and Lawrence Stevens. Fateful Journey: Injury and Death on Colorado River Trips in Grand Canyon. Flagstaff, AZ: Red Lake Books, 1999.
5. Jonas, Lilian. “Historic Profile of Colorado River Users: An Overview and Integration of Existing Data.” Submitted to Grand Canyon National Park, Grand Canyon Science Center – Research Office.
6. Ibid.

River News 08/30/02

OUTFITTER MYTHS YOU SHOULD KNOW ABOUT

Myth: The new plan will reduce the number of people able to take a river trip.
Correction: The current plan was set up and has been run in such a way that tens of thousands of people have been prevented from running the river over the past 20 years. A plan based on wilderness principles and fair access for all could increase visitation.

Myth: The river environment is now being used to full capacity.

Correction: The Grand Canyon could handle more people if wilderness policy was enforced. Social contacts would be diminished if launches were no longer bunched on weekends.

Myth: The new plan will prevent old, young, and the disabled from taking trips.

Fact: The current plan grossly favors large motorized rafts that are more difficult to use by old, young, and disabled people. Rowing trips have a higher crew to passenger ratio, and utilize more accessible craft. Research shows that people of all ages and capabilities use, and prefer, rowing trips.

Myth: The river will be restricted to an elite few under new proposals.

Fact: Under the current plan, half of commercial passengers come from upper income brackets (over $100,000 per year). Currently, motorized commercial trips are exorbitantly expensive. The new plan must emphasize visitation by a much broader spectrum of users.

Living Rivers Currents 9/01/02

Volume 2, Number 5, September 2002

The Articles

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Living Rivers Currents 09/01/02

Sedimenal Journey Challenegs BuRec's Birthday

Volume 2, Number 5, September 2002

As the last of the fireworks exploded over the Bureau of Reclamation's (BuRec) $600,000 centennial party at Hoover Dam, a ceremony of a much different sort was underway 250 miles upstream. A river restoration crew labored well into the next morning to deliver three tons of sediment to Grand Canyon's suffering river ecosystem. With the last grains of sediment deposited, Living River's first Sediment-al Journey was proclaimed a success.

Five nights earlier it all began at a rally on the banks of a free-flowing Colorado above Canyonlands National Park. Accompanied by music, dancing and calls for river restoration, a brigade of activists loaded 300 bags (25-pounds each) of sediment from a sandbar in the middle of the river. The bags were paddled ashore and loaded into a dump truck emblazoned with banners reading "Reclaim the Bureau," and "Return the Sediment, Return the Flow, Save Grand Canyon from Glen Canyon Dam."

The caravan then began its journey downstream supported by 85 envi-ironmental and social justice groups demanding immediate action by BuRec to correct the damage Glen Canyon Dam has caused to Grand Canyon's river ecosystem. More sediment was gathered at the Journey's second rally at Antelope Point, on the Navajo reservation adjacent to Lake Powell reservoir. Max Goldtooth, a Navajo medicineman and water activist stated, "We've not taken care of our rivers and that's why we're having these droughts. Our offerings are blocked in their journey to the ocean by these dams."

The next day road vehicles were abandoned for a flotilla of nine boats to float the 15 miles of the Colorado River below Glen Canyon Dam. Just as the native fish are no longer able to survive in Grand Canyon, we too shivered in the 46 degree water released from the dam. The lack of natural sediment was also fully evident in the crystal clear water. But amidst the 800-foot sheer walls of this, the un-inundated section of Glen Canyon, we made the first offering of sediment back to the river.

Sediment was scheduled to be deposited following the conclusion of a rally held early in the day at Lee's Ferry, the launch location for Grand Canyon river trips, but the National Park Service banned the release of any of our sediment. "It's obscure why they want to arrest me for attempting to comply with the Grand Canyon Protection Act, and for attempting to do my part to heal the river," said Dr. Brent Blackwelder, President of Friends of the Earth.

Following a rally in Grand Canyon National Park the next day, the Journey held its final event at Hoover Dam, a few hours in advance of the BuRec's centennial celebration. Visitors to the dam were treated to river restoration melodies, dancing fish and the truth about the impacts of BuRec's devastation of the Colorado. "It's time for BuRec to get on with the task of decommissioning Glen Canyon Dam," the Sierra Club's Marcia Hanscom told the crowd gathered at Hoover Dam. "Grand Canyon deserves better and so does the Colorado River."

That was the message picked-up by the media at each stop along the 700-mile journey. So although our truckload of sediment, which was finally delivered to the Grand Canyon later that evening represented just .000003% of the amount which it should naturally receive, it represented a significant step toward building public awareness and interest in the reform of the Bureau of Reclamation and restoration on the Colorado River.

Living Rivers Currents 09/01/02

Navajo Dam: BuRec Says "No" to Decommissioning

Volume 2, Number 5, September 2002

The Bureau of Reclamation (BuRec) has released its draft plan for the re-operation of Navajo Dam, the largest dam on the San Juan River. Under requirements of the Fish and Wildlife Service to take steps to reverse the decline of native Razorback Sucker and Colorado Pikeminnow habitat in the San Juan, BuRec is proposing flow recommendations to reduce the likelihood that the river will run dry, as it nearly has with increasing frequency.

In assessing the decommissioning alternative proposed by Living Rivers and others, BuRec states "It would result in the loss of reservoir storage needed to allow for contract

water deliveries to the San Juan-Chama Project, the NIIP [Navajo Indian Irrigation Project] and other contractors...”

The NIIP has yet to be fully completed, and has been a money loser from the start. The Navajo Nation could generate far more revenue were it to sell water to users downstream, than to continue with the NIIP. The San Juan-Chama water is primarily used to supplement Rio Grande instream flows for endangered Silvery Minnow. Rio Grande water users should get their own water budgets in line, not divert water from the San Juan, which has its own instream flow needs to protect endangered fish.

BuRec is recommending that flow levels out of Navajo Dam be as low as 250 cubic feet per second. With increasing diversions occurring over the 171-mile river corridor downstream of the dam, Living Rivers believes this will not be enough water to prevent stream dewatering.

Comments on the Draft EIS will be accepted until November 4, 2002. For additional information contact Living Rivers.

Living Rivers Currents 09/01/02

Grand Canyon: LR Takes on New River Managment Plan

Volume 2, Number 5, September 2002

The National Park Service (NPS) is getting underway on rewriting its management plan for the Colorado River through Grand Canyon National Park. With four of the Canyon’s eight native fish species extinct, two more headed in that direction and little action on behalf of the Park Service to uphold the Endangered Species Act against the impacts of Glen Canyon Dam, Living Rivers initiated an organizing effort to demand that this new plan address the declining ecological integrity of the river.

When first announced, NPS implied that this new river plan would principally focus on human recreation on the river and defer all comments pertaining to river ecology to the Bureau of Reclamation’s Adaptive Management Program for Glen Canyon Dam. This runs counter to the first goal of its existing 1989 plan, “To preserve the natural resources and environmental processes of the Colorado River corridor and the associated riparian and river environment.”

"The Park Service’s failure to preserve natural process is rationale to elevate this objective to the highest priority, not to eliminate it from their management objectives altogether,” said John Weisheit, Living Rivers Conservation Director. Weisheit and other Living Rivers staff and volunteers took this message on the road for two weeks in

August. Dubbed the “Habitat Security Tour,” the crew conducted outreach at public meetings pertaining to the river management plan in Denver, Salt Lake City, Flagstaff, Las Vegas and Phoenix.

Clad in life-like endangered fish costumes of Humpback Chubs and Razorback Suckers, and sporting Living Rivers Habitat Security jumpsuits, participants were greeted with a friendly message about the need for swift action on behalf of NPS to reverse the native habitat decline in Grand Canyon’s river corridor.

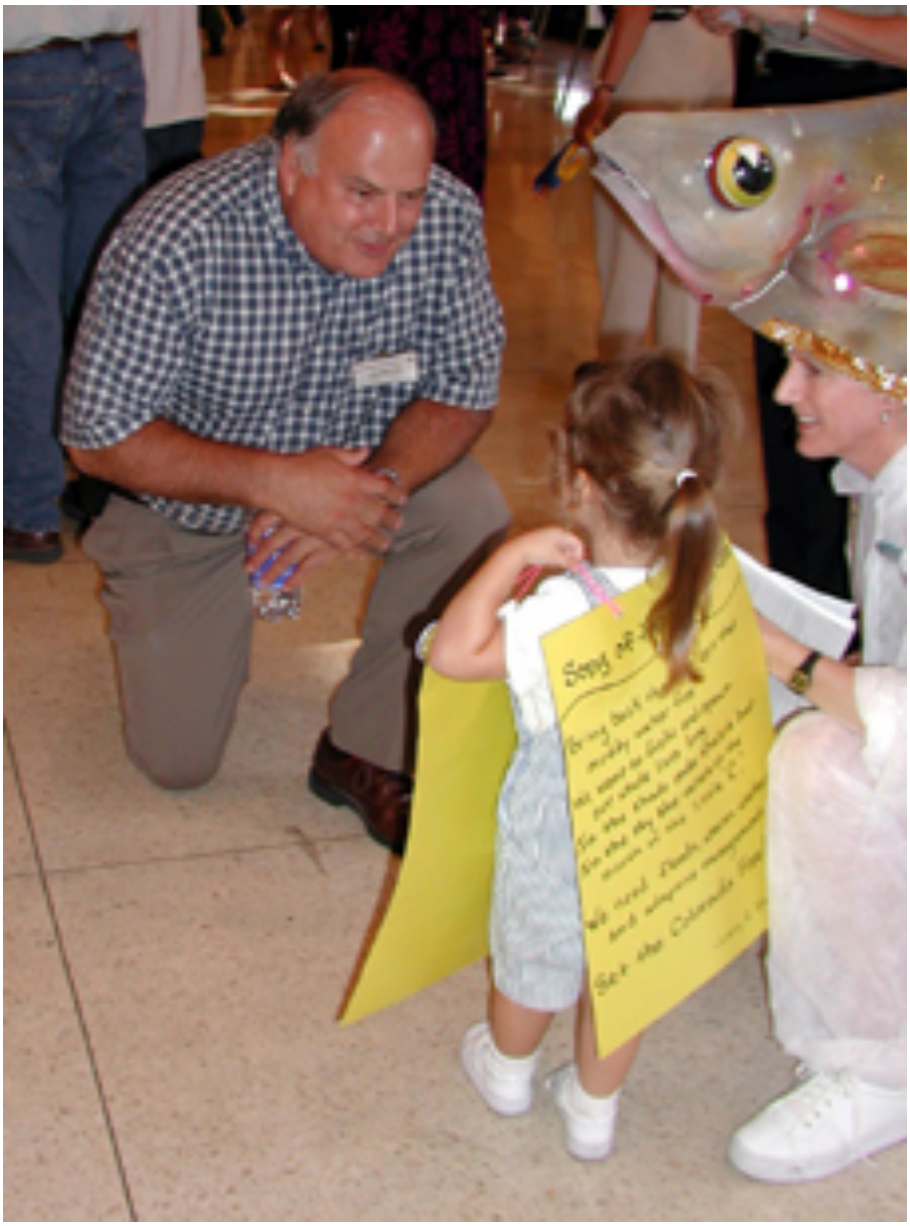
“You’re certainly getting your message out,” said Joe Alston, Superintendent of Grand Canyon National Park, and “We want you to know that we do care about the fish.”

In the letter delivered to Mr. Alston, in Denver, Living Rivers also reinforced that the ecological changes occurring in Grand Canyon’s river corridor represent a significant violation of the NPS’s Organic Act (1916) which requires that NPS preserve its lands unimpaired for the enjoyment of current and future generations. Specifically the letter demanded that the new river management plan identify means to:

- Restore essential sediment and nutrient flows from the mainstem Colorado River into Grand Canyon.
- Restore natural flow regimes to properly transport this sediment within Grand Canyon, when and where the sediment belongs.
- Restore natural seasonally variable water temperatures in the mainstem Colorado River through Grand Canyon.
- Develop a restoration and recovery program for the Colorado River corridor in Grand Canyon that includes the full recovery of all species known to be native to Grand Canyon prior to the operation of Glen Canyon Dam.
- Implement a non-native eradication program to minimize alien species in the Grand Canyon River corridor with a priority on those that prey on, compete with, or otherwise impair the health of native plants and animals.

To further this effort, Living Rivers has also helped to form the Grand Canyon Wilderness Alliance, a nationwide coalition working to ensure this new river management plan addressees a range of issues. In addition to ecological integrity, high on the Alliance’s list is ensuring the river corridor is managed as wilderness, eliminating the use of motorized rafts, and improving access for private river runners, who currently must wait up to 20 years to run the river as commercial outfitters are given 80 percent of the permits.

Public comments on the proposed scope of the Grand Canyon River Management Plan are being accepted until November 1, and additional public meetings are scheduled for Washington DC and San Francisco. Please send letters demanding that the Park Service address the river’s ecological integrity in the plan. Direct them to: Colorado River Management Plan, Grand Canyon National Park, PO Box 129, Grand Canyon, AZ 86023. Email: grca_crmp@nps.gov



More Information:
Scoping comments: Grand Canyon Wilderness Alliance

Living Rivers Currents 09/01/02

Fossil Creek: APS Files for Surrender

Volume 2, Number 5, September 2002

Arizona Public Service Company (APS) has filed with the Federal Energy Regulatory Commission (FERC) a long-awaited “application to surrender” its license for operating the Childs-Irving Hydropower Plants at Fossil Creek. The Application to Surrender

marks perhaps the most significant milestone yet in Living Rivers battle to restore Fossil Creek and the surrounding riparian habitat.

The Childs and Irving plants are 90 and 100 years old respectively and draw the entire flow of Fossil Creek out of the stream bed and into a series of penstocks, flumes and tunnels for hydropower production. The plants produce a minuscule amount of power in comparison to the major damage they wreak on Fossil Creek, a perennial stream in the central Arizona desert.

The United States Forest Service (USFS)however is somewhat concerned. “Although the Forest Service strongly supports the goal of surrender and decommissioning to restore full stream flow to Fossil Creek, the Forest Service opposes certain provisions of the settlement agreement.” Of particular concern is the USFS’s request that “Additional or different structures are retained in the project site.” Before the agreement was signed, each of the significant 52 components of the plants was considered, studied and its removal or retention painstakingly negotiated. To reopen these negotiations would be an unnecessary bureaucratic burden.

Living Rivers and the other environmental groups involved in the initial negotiations are still highly engaged and prepared to battle for nothing less than the initial goal: full flows to Fossil Creek. No compromise is acceptable.

Living Rivers Currents >09/01/02

Climate Change: Uncertainty for the Colorado

Volume 2, Number 5, September 2002

The Environmental Protection Agency (EPA) and the United States Geological Survey (USGS) have published studies concerning global climate change and how these predicted changes could affect our future water supplies. As the Colorado River is the major supplier of water for 30 million people, these important studies forecast scenarios for both a severe sustained drought and also for years of severe flooding.
The results suggest the following for the Colorado River basin:

- streamflow can increase or decrease by as much as 30 percent
- the 400-year average virgin streamflow for the Colorado River at Lee’s Ferry in northern Arizona totals 13.5 million acre-feet per year (16.4 was the original projection)
- the 20th Century was a wetter century than normal, with an approximate 20 percent higher yield
- high magnitude floods can stress spillway mechanisms and overflows will damage areas of development; dam failures are possible.

The above data does not compliment the “Law of the River,” the working document that governs the allocations and delivery systems for the seven states of the Colorado River basin and Mexico. Nature’s variations and man’s miscalculations will make it more and more difficult to plan for the long-term management of our water resources.

The data suggest that in the last 400 years there have been many severe sustained droughts in the Colorado River basin, with the longest occurring about 1579-1598. During that 20-year cycle it has been estimated that a 20 percent reduction in streamflow occurred for the Colorado River basin. Within that 20-year period there was a five-year cycle where streamflow was reduced by 34 percent. Says Robert Webb at the USGS Desert Lab in Tucson, “It is impossible to predict the weather for the next 20 years. We do know that as more and more people become dependent upon the available surface water and as our groundwater reserves become depleted, that it is going to be harder and harder to project and meet our upcoming operation plans.”

In modeling the affects of a severe sustained drought, it has been demonstrated that current water allocations will especially stress the upper basin states because their water rights are largely junior to those of the lower basin. The lower basin will be affected in another costly scenario: an increase in the salinity of their water at levels above legal standards and the associated costs to mitigate that increase.

A severe sustained drought for the Colorado River basin will also bring reservoir levels to near dry conditions and will effectively reduce hydropower by as much as 36 percent. However, it was noted in the reports that such a reduction in electricity would not cause major disruptions for most regional power grids. For Lake Powell, reservoir levels would drop 230 feet to the elevation of the generator’s intake pipes (penstocks) and would subsequently leave boat ramps and marinas high and dry. Compounding the situation would be the 30 miles of sediment plugs for both the Colorado and San Juan River arms.

According to John Dohrenwend, a retired USGS surficial geomorphologist, “As the rivers erode through these sediment deposits, the sand and silt will be mobilized and deposited closer to other reservoir facilities, including Glen Canyon Dam. Such sediment transport would significantly diminish the life expectancy of Lake Powell reservoir.” Because of the legal mandate to deliver on average 8.23 million acre-feet of water per year to the lower basin, Lake Mead reservoir levels would not be as drastically reduced. However, Lake Mead is still projected to experience diminished reservoir levels that would have similar sediment impacts on its water quality and recreational access.

Since 1942 there has been a reduction of sediment inputs into the reservoirs of the Colorado River basin. Current storage of normal erosional materials now occurs in the side streams and arroyos of the Colorado, Green and San Juan Rivers. Large destructive floods, such as occurred from about 1862 to 1941, will eventually transport this stored sediment into the many reservoirs of the basin. The deposition and storage of this sediment would greatly reduce the water storage capabilities of the reservoirs and consequently tax the flood control features of the dams. Catastrophic flood events

have been projected to even remove dams, which would consequently destroy the water delivery structures downstream. With no infrastructure to deliver water to the farms and metropolitan areas of the Southwest, the region's economic base would be severely compromised.

Richard Hereford of the USGS at Flagstaff, notes that, "Based on the remains of flood deposits in the vicinity of Lee's Ferry, Arizona, we know that streamflows of 500,000 cubic feet per second have occurred in our historic times." Glen Canyon Dam is designed to bypass flood flows but much depends on the duration of the flood, the volume of the flood and how much reservoir storage is available. In 1983, when the reservoir was full, spillway damage did occur when the total discharge at the dam was only 92,600 cfs, which also caused millions of dollars in flood damage to the lower basin.

With the scientific information currently available on climatic scenarios, obviously the current system of water allocation and delivery systems in the thirsty West is seriously flawed. It is therefore absolutely necessary to continue the process that will modify the various aspects of water law, policy and infrastructure with rigor and vigilance.

Living Rivers Currents 09/01/02

BuRec Commissioner John Keys Wants to Hear from You!

Volume 2, Number 5, September 2002

At the end of September BuRec will release a draft environmental assessment for experimental operations of Glen Canyon Dam to restore native fish habitat in Grand Canyon. In 1996 such tests failed and these will too. Join Living Rivers and the Grand Canyon Coalition in telling BuRec to stop testing, and start fixing, the Grand Canyon. Meetings are to be announced for Phoenix and Flagstaff. Living Rivers Habitat Security Force will be there. Check Living Rivers website for details, including advise on, and where to send in your comment letters.

River News 09/11/02

RRFW Riverwire – OUTFITTER POLICY ACT STAGES A COMEBACK

September 11, 2002

HR 2386, the Outfitter Policy Act, is scheduled for House Resources Committee "mark-up" tomorrow. Please call your congressperson in regards to this bill. This is especially important if your congressperson is on the Resources Committee (list at end). It is important that Congress know that this bill is controversial and that it severely hampers land managers and the public.

The RRFW is opposed to the Outfitter Policy Act of 2001 (HR. 2386) because the bill fundamentally alters the laws governing the management of our public lands, provides new privileges to one class of recreational user at the expense of the general public and other users, restricts the powers of federal land managers to best manage lands for multiple use, and puts non-profit institutional organizations at a disadvantage when seeking to conduct educational and recreational outings for their members.
Opposition to HR. 2386

This bill reduces land agency discretion in management of public lands and limits public and non-commercial use of public lands as the bill would --

1) Burden federal land managers to guarantee "reasonable opportunity" for profits to commercial outfitters using public lands. This will result in: o "Grandfathering" commercial outfitter use in areas where high recreational demand mandates restrictions on public recreation access, thereby creating disproportionate use of scarce public resources by a select group o Limiting the number of authorized outfitters so that each has a better chance to make a profit, thereby limiting public choice and the benefits of healthy outfitter competition o Granting outfitters potentially greater access to federal lands than the public

2) Elevate commercial outfitter permits to a legal status greater than other types of federal permits, allowing permits to be transferred, inherited or sold and restricting the ability of land managers to modify, enforce or revoke permits

3) Continue to leave the status of institutional groups and non-commercial outfitters ambiguous, allowing different interpretations of the rules in different land agency jurisdictions

The favoritism provided to commercial outfitters coupled with the continued uncertain definition of institutional groups would reduce or eliminate outings by non-profit civic, children, and environmental education groups in our nation's most popular recreation areas. Even volunteer-led outings would be reduced or eliminated.

While there may be a need for reform of current permitting polices, there should be a clarification of the permitting process for non-profit institutional groups - an area not explicitly addressed by the current legislation.

House Resources Committee Members

Neil Abercrombie, (Dem.) Hawaii 1st 1502 LHOB 202-225-2726

Anibal Acevedo-Vila , (Dem.) Puerto Rico Resident Commissioner 126 CHOB 202-225-2615

Ken Calvert, (Rep.) California 43rd 2201 RHOB 202-225-1986

Chris Cannon, (Rep.) Utah 3rd 118 CHOB 202-225-7751

Brad Carson, Oklahoma 2nd 317 CHOB 202-225-2701

Donna M. Christian-Christensen, M.D., (Dem.) Virgin Islands Delegate 1510 LHOB 202-225-1790

Barbara Cubin, (Rep.) Wyoming At Large 1114 LHOB 202-225-2311

Peter DeFazio, (Dem.) Oregon 4th 2134 RHOB 202-225-6416

Calvin M. Dooley, (Dem.) California 20th 1201 LHOB 202-225-3341

John J. Duncan, Jr., (Rep.) Tennessee 2nd 2400 RHOB 202-225-5435

Eni F.H. Faleomavaega, (Dem.) American Samoa Delegate 2422 RHOB 202-225-8577

Jeff Flake, (Rep.) Arizona 1st 512 CHOB 202-225-2635

Elton Gallegly, (Rep.) California 23rd 2427 RHOB 202-225-5811

Jim Gibbons, (Rep.) Nevada 2nd 100 CHOB 202-225-6155

Wayne T. Gilchrest, (Rep.) Maryland 1st 2245 RHOB 202-225-5311

James V. Hansen, (Rep.) Utah 1st, Chairman 242 CHOB 202-225-0453

J.D. Hayworth, (Rep.) Arizona 6th 2434 RHOB 202-225-2190

Joel Hefley, (Rep.) Colorado 5th 2230 RHOB 202-225-4422

TIM HOLDEN, (Dem.) Pennsylvania 6th 2417 RHOB 202-225-5546

Rush Holt, (Dem.) New Jersey 12th 1630 LHOB 202-225-5801

Jay Inslee, (Dem.) Washington 1st 308 CHOB 202-225-6311

Walter B. Jones, Jr., (Rep.) North Carolina 3rd 422 CHOB 202-225-3415

Dale E. Kildee, (Dem.) Michigan 9th 2107 RHOB 202-225-3611

Ron Kind, (Dem.) Wisconsin 3rd 1713 LHOB 202-225-5506

Edward J. Markey, (Dem.) Massachusetts 7th 2108 RHOB 202-2252836

Scott McInnis, (Rep.) Colorado 3rd 320 CHOB 202-225-4761

Betty McCollum, (Dem.) Minnesota 4th 1029 LHOB 202-225-6631

George Miller, California 7th 2205 RHOB 202-225-2095

Grace F. Napolitano, (Dem.) California 34th 1609 LHOB 202-225-5256

Solomon P. Ortiz, (Dem.) Texas 27th 2304 RHOB 202-225-7742

Tom Osborne, (Rep.) Nebraska 3rd 507 CHOB 202-225-6435

C.L. (Butch) Otter, (Rep.) Idaho 1st 1711 LHOB 202-225-6611

Frank Pallone, Jr., (Dem.) New Jersey 6th 420 CHOB 202-225-4671

John E. Peterson, (Rep.) Pennsylvania 5th 307 CHOB 202-225-5121

Richard Pombo, (Rep.) California 11th 2411 RHOB 202-225-1947

George P. Radanovich, (Rep.) California 19th 123 CHOB 202-225-4540

Nick Joe Rahall, II, (Dem.) West Virginia 3rd, Ranking Democrat 2307 RHOB 202-225-3452

Dennis Rehberg, (Rep.) Montana At Large 516 CHOB 202-225-3211

Jim Saxton, (Rep.) New Jersey 3rd 339 CHOB 202-225-4765

Bob Schaffer, (Rep.) Colorado 4th 212 CHOB 202-225-4676

Michael K. Simpson, (Rep.) Idaho 2nd 1440 LHOB 202-225-5531

River News 09/12/02

RRFW Brochure Now Online!

Check out the RRFW Brochure in Adobe Acrobat Format (note: you need the free Adobe Acrobat Reader at Acrobat Reader)

To see the inside:RRFW Brochure Inside [257kb PDF File]
To see the outside:RRFW Brochure Outside [209kb PDF File]

The files open in portait view. Click on the "rotate" menu, and chose "clockwise" to see the pages in landscape view in Acrobat Reader 5.

Take Action 09/23/02

Save San Juan River endangered fish: Decommission Navajo Dam!

The status of the endangered fish of the San Juan River has become supercritical. In 1992, fishery biologists working on the San Juan River were unable to find any adult Razorback Suckers and only about 100 adult Colorado Pikeminnows. Now, no adult fish of either species can be found. All because of the operations of Navajo Dam.
The Bureau of Reclamation has released a Draft Environmental Impact Statement (DEIS) proposing flow modifications for Navajo Dam, but this is too little, too late. Your input is urgently needed to demand that BuRec more comprehensively address and recommend the decommissioning alternative referenced in the DEIS so that it can comply with the law and recover the endangered fish of the San Juan River.

- Navajo Dam caused the inundation of critical breeding habitat, and blocks the natural migration route to rearing habitat 100 miles downstream. The major issue is not flows, but this loss of habitat and the river's natural dynamic processes. San Juan River endangered fish must be able to spawn high enough in the river channel, such that hatchlings can become sufficiently strong prior to be flushed into Lake Powell reservoir and consumed by non-native fish. The only way to remedy this situation is to move forward with the decommissioning alternative for Navajo Dam.

- The San Juan River's other critical native fish nursery habitat was inundated by Lake Powell reservoir. Therefore, a comprehensive EIS of the decommissioning of Glen Canyon Dam must also be undertaken to ensure the recovery of San Juan River endangered fish.

- The preferred alternative of a minimum flow of 250 cfs (cubic feet per second) outlined in the DEIS is unhealthy. It will degrade the water quality and promote the growth of algae, which depletes oxygen necessary for viable native San Juan fish habitat, were such habitat in existence.

- The 500 cfs minimum alternative, although theoretically better than the 250 cfs preferred alternative, does not address the loss of historic spawning habitat high enough up in the river channel to allow for native fish to sufficiently mature before the river propels them into Lake Powell reservoir.

- These proposed alternatives were based on experiments that yielded no demonstrated recovery of native fish, and are based solely on meeting water delivery contracts within the San Juan system and to maintain non-native trout habitat for sport fisherman.

- The DEIS does not sufficiently evaluate the impacts of potential future diversions on endangered fish habitat. The Animas-La Plata Project, Navajo-Gallup pipeline and further expansion of the Navajo Indian Irrigation Project will significantly

reduce flows necessary for recovery of San Juan River endangered fish habitat.

- The decommissioning of Navajo Dam will provide a net financial gain to Federal taxpayers, as the primary beneficiary of Navajo Dam is the Navajo Indian Irrigation Project, which receives subsides averaging $1.5 million annually because of the project's inefficiencies.

- The DEIS makes no provisions for addressing the predation of native fish by non-native fish such as Catfish and Stripped Bass.

- The DEIS makes no provisions for mitigating the impacts on endangered fish habitat from pollutants found in the river, such as PCBs, mercury, DDT, selenium, chlorine and chlordane.

For over ten years the San Juan River Basin Recovery Implementation Program has failed to restore a self-sustaining native fish population in the San Juan River as it flows through New Mexico, Colorado and Utah, and these new proposals offer more of the same.

Restoration of the river ecosystem can be implemented by simply creating programs that conserve water in our communities and farms. Such programs will save money, taxes and increase productivity while saving the natural and cultural heritage of the San Juan River.

Direct your comments by December 4, 2002 to:

Mr. Ken Beck
Bureau of Reclamation
Western Colorado Area Office
Southern Division
835 East Second Avenue
Suite 400
Durango, Colorado 81301

Email:kbeck@uc.usbr.gov
Fax: (970) 385-6539 Telephone: (970) 385-6558

Take Action

Say NO to new Glen Canyon Dam operations

The Bureau of Reclamation (BuRec) will soon be releasing a draft environmental assessment proposing new operating requirements for Glen Canyon Dam. BuRec's objective is to convince the public that it is working hard to stop the decline of the

Humpback Chub, which is about to become the fifth Colorado River endangered fish to go extinct in Grand Canyon National Park since the completion of Glen Canyon Dam. Your input is needed to tell BuRec that you are not so easily fooled, that its proposed tinkering with Glen Canyon Dam will not be enough to protect these fish, and that BuRec has been ignoring the law by not establishing a second population of Humpback Chub in the mainstem Colorado River in Grand Canyon National Park.

- BuRec has been experimenting with Glen Canyon Dam for more than six years. Over this time period Humpback Chub populations have declined from 8,000 to 2,000 adult fish. Furthermore, four other fish, Colorado Pikeminnow, Bonytail Chub, Roundtail Chub and Razorback Sucker, are already extinct. Nonetheless, BuRec has been widely promoting its efforts as successful, and indicative of a commitment to endangered fish recovery, when nothing could be further from the truth. BuRec must stop misleading the public and report on the true impacts of its dam operations on native fish habitat in Grand Canyon National Park.

- The flows being proposed only allow for minor changes in Glen Canyon Dam's operations, all of which could be overruled by electricity producing interests. BuRec must immediately implement operational guidelines for Glen Canyon Dam consistent with the 1996 biological opinion of the Fish and Wildlife Service calling for low, seasonally adjusted steady flows, and that such flows cannot be interrupted by any interests other than those agencies scientifically responsible for the recovery of the Humpback Chub.

- BuRec continues to ignore the a 1996 law requiring that a second population of Humpback Chub be established in Grand Canyon National Park. At present, only one population has been able to survive by moving to the Little Colorado River, in what historically has not been its native habitat. Therefore, in addition to addressing flows from the dam to influence habitat near the Little Colorado River, BuRec must meet the natural sediment, nutrient and water temperature needs to re-establish a second population of Humpback Chub in the Colorado River in Grand Canyon National Park.

- BuRec must complete a new Environmental Impact Statement on the reoperations of Glen Canyon Dam that addresses the full range of issues associated with the recovery of endangered Humpback Chub, and the full range of alternatives to resolve them, including the decommissioning of the dam.

Direct your comments to:

Mr. Michael Gabaldon
Deputy Director of Operations
U.S. Bureau of Reclamation
Department of Interior
1849 'C' Street, NW
Washington, DC 20240

email: mgabaldon@usbr.gov
fax: (202) 513-0308

LR Letter 9/25/02

Requesting expanded public participation for review of Glen Canyon Dam experimental flows

Mr. Michael Gabaldon
Deputy Director of Operations
U.S. Bureau of Reclamation
Department of Interior
1849 'C' Street, NW
Washington, DC 20240
Via Fax: 202-513-0308
RE: AMWG Public Participation

Dear Mr. Gabaldon,

Yesterday, the Bureau of Reclamation (BuRec) announced public meetings and its comment period for the Draft Environmental Assessment (DEA) of the proposed experimental flows from Glen Canyon Dam. BuRec has unnecessarily compressed the calendar for this public comment period, and in the process, further reinforced the continued disregard the Adaptive Management Working Group (AMWG) has for appropriate public participation.

1. The public has been given only 8/9 days notice for the upcoming public meetings (Flagstaff, AZ on October 2 and Phoenix, AZ on October 3). At minimum the public should be given 30 days notice of upcoming meetings.
2. The public will not be able to obtain the DEA, for which the public meetings are about, until the first of the two meetings. The DEA should be available for at least two weeks in advance of the first public meeting.
3. The public has only 18 days following the release of the DEA to submit comments. The public should have 30 days following the final public meeting to submit comments, or at minimum, 30 days following the public release of the DEA.
4. BuRec has scheduled the public meetings on the exact same days BuRec will be holding similar meetings on the Draft Environmental Impact Statement for the reoperations of Navajo Dam on the San Jaun River, making it difficult for members of the public to attend both.

To address these concerns, we respectfully request that you:

1. Add additional public meetings in Phoenix and Flagstaff with at least 30 days advance notice.
2. Extend the public comment period to 30 days after the final public meeting.
3. Require the AMWG to adopt and adhere to reasonable policies for ensuring adequate time for the public to participate in NEPA processes, such as commenting on the proposed experimental flows.

As the monsoon season in the watershed of the Paria River will have nearly passed, prior to any final decision being issued on this matter, there is no compelling reason not to extend the public participation process to accommodate a more reasonable schedule.

Furthermore, as was outlined in Living River's letter to you of January 18, 2002, the lack of attention to public participation by the AMWG is of major concern to us and the eight other organizations that signed the letter. You assured us that public comment was indeed a requirement of the AMWG process and that we would receive a timely response, yet none has been received.

As also mentioned in the January 18 letter, AMWG has a tremendous public responsibility for ensuring the future health and vitality of Grand Canyon's river ecosystem. As such, we appreciate the opportunity to participate in the upcoming meetings. We are concerned, however, that this ongoing disregard for making reasonable allowances for public input, and ignoring that input once received, continues to plague the effectiveness of the AMWG.

We look forward both to your response concerning this request to expand the public participation process for the experimental flows, and to our letter of January 18, 2002.

Sincerely,

Owen Lammers
Executive Director

cc: Hon. Gale Norton, Secretary of the Interior Hon. John Keys, Commissioner, U.S. Bureau of Reclamation
Mr. Rick Gold, Director, Upper Colorado Region, U.S. Bureau of Reclamation
Mr. Robert Johnston, Director, Lower Colorado Region, U.S. Bureau of Reclamation
Mr. Joseph Alston, Superintendent, Grand Canyon National Park
Ms. Kitty Roberts, Superintendent, Glen Canyon National Recreation Area
Mr. Denny Fenn, Director, Grand Canyon Monitoring & Research Center

LR Press Release 09/25/02

New dam flows to further fish extinction in Grand Canyon
Public Played for fools by Interior Department

Contact:

Owen Lammers 435-259-1063
Lisa Force 480-990-7839

Yesterday the Bureau of Reclamation (BuRec) announced plans to solicit public comments on proposed experimental operating guidelines for Glen Canyon Dam under the guise of restoring endangered fish habitat in Grand Canyon National Park. Should the plan be implemented as proposed the endangered fish in question, the humpback chub, will likely be extinct before they can complete their multi-year experimentation.

"This is nothing more than the latest act in a six year-long charade by BuRec, and the water and power interest that control the operations of Glen Canyon Dam, to pretend that they are serious about reversing the extensive damage this dam has caused to one of the world's most famous national parks," says Living River's executive director Owen Lammers.

Since 1996, the Department of Interior has been required to establish viable populations of endangered humpback chub in two sections of the Colorado River in Grand Canyon National Park. But despite much fanfare surrounding this proposed and past experiments at Glen Canyon Dam, they have only succeeded in administering to the decline of the one remaining population. As of the summer of 2001, just 2,000 adult humpback chub remained in Grand Canyon, down from more than 8,000 when their experiments began.

Since BuRec and its supporters continue to only partially address some of the major variables impeding native fish recovery in Grand Canyon, the list of extinct native fish in Grand Canyon will soon increase from four to five. The razorback sucker, bonytail chub, roundtail chub and Colorado pikeminnow are already extinct in Grand Canyon due to the operations of Glen Canyon Dam.

- The current proposal will not reintroduce any of the 100 million tons of the sediment and nutrients critical for native fish habitat. It will only, if successful, reposition the minimal sediment remaining in the Canyon.
- The current proposal will not fully simulate the natural rivers flow through the dam, only partially mimic a high water event over a few days and in the dead of winter when natural flows would be quite low.

- The current proposal will not address the need to increase the river's water temperature, the major factor impeding native fish reproduction due to gonad suppression, as dam operations dropped the river's temperature to 46 degrees.

"They just want to tell the public, 'we tried,' and then go back to operating the dam however they wish once the fish are extinct," adds Lammers.

Living Rivers is also concerned with the accelerated public review process for this new proposal. Barely a week's notice was given for public meetings scheduled for Flagstaff and Phoenix, Arizona next week, and the public will only have 18 days to review and submit comments on the draft proposal's draft environmental assessment. Living Rivers has asked that this process be extended.

LR in the News 10/01/02

U.S. wants to flood Canyon to save native fish

By Shaun McKinnon for The Arizona Republic

Federal officials want to flood the Grand Canyon and evict thousands of non-native fish from the Colorado River next year in a repeat of a controversial 1996 experiment that produced inconclusive results and temporary benefits.

The U.S. Bureau of Reclamation will present its proposal at public briefing sessions this week in Phoenix and Flagstaff, outlining a plan scientists hope will begin to mend an ecosystem bruised more than 40 years ago by the construction of Glen Canyon Dam.

The two-year experiment calls for artificial floods similar to one staged in 1996 aimed at rebuilding some of the riverbanks and beach habitats along the canyon floor.

Scientists also would remove as many as 20,000 non-native rainbow and brown trout from the river in an effort to improve conditions for endangered native fish such as the humpback chub, whose numbers have dwindled from 8,000 to about 2,000 since the mid-1990s. The trout are thought to prey on the chub.

The experiments are part of a long-term goal of correcting problems created by the dam, including the loss of natural sediment, a drop in water temperature and the introduction of non-native fish. The floods, for example, attempt to mimic temporarily the natural behavior of the river, whose flows once fluctuated significantly over a year's time.

A 1996 flood, presided over by former Arizona Gov. Bruce Babbitt, then-Interior secretary, appeared to shore up some of the damaged beaches with few of the side effects predicted by critics.

Later studies suggested the flood's effects were short-lived and did little to help the endangered fish.

Several environmental groups say the latest plan is too little too late, especially for the chub and other species struggling to survive in their altered environment.

Owen Lammers, executive director of Living Rivers, called the proposal "the latest act in a six-year-long charade" by the bureau and water and power interests whose inattention has threatened the river's ecosystem.

"They just want to tell the public, 'we tried,' and then go back to operating the dam however they wish once the fish are extinct," Lammers said.

He said the experiments fail to reintroduce any new sediments and nutrients critical for native fish habitat and don't address the need to raise water temperatures below the dam. Native fish struggle to survive in the colder river, while the non-native predators thrive.

Nikolai Ramsey, program officer for Flagstaff-based Grand Canyon Trust, said the experiments will produce benefits, but delays in their start have compromised the overall goals.

Changes in the river's flow should have begun in early September to properly prepare the river for a full-scale artificial flood, Ramsey said. He also worries that the government has lost sight of the endangered fish, which continue to die.

"We should be putting our efforts more strongly into saving the chub," Ramsey said. "This is a fish that has lived in the Colorado River and only the Colorado River for 2 million years and now is close to extinction because of what we've done to the river."

Ramsey predicts stiff opposition to the government's plan from both environmentalists and others with a stake in the river, including sport fishery groups.

The timing and scale of the experiments will hinge in part on weather conditions in the coming months. Drought choked summer runoff from the Paria River, a tributary of the Colorado that in normal years would have shifted sand and sediment downstream into position for the artificial floods. Scientists don't yet know if there's enough to stage a flood by January.

Randy Peterson, manager of the bureau's upper-Colorado environmental resources division, said that plans allow scientists to adjust the schedule for the larger floods, which send water gushing through Glen Canyon Dam's rarely used bypass tubes. Those floods would take place as soon as the Paria delivers enough sand and sediment.

The fish relocation could begin as early as January, when above-normal flows from the dam would be used to disrupt spawning. Later in the year, biologists would use electrical charges to stun the fish at various spots along the river. The non-native fish would be removed and relocated, while native species would be left in the river.

Media Advisory 10/01/02

River and Navajo activists call for Decommissioning of Navajo Dam
San Juan River endangerd fish in jeopardy because of Dam

Contact:
John Weisheit (435) 259-1063; Mobile (435) 260-2590
Lisa Force (480) 990-7839

The status of the endangered fish of the San Juan River has become supercritical despite efforts of the San Juan River Basin Recovery Implementation Program, which started in 1992. At that time fishery biologists working on the San Juan River were unable to find any adult Razorback Suckers and only about 100 adult Colorado Pikeminnows. Now, ten years later, even adult Pikeminnows cannot be readily found by the scientists and for what natural reproduction does occur, the numbers are very discouraging for those who care about the plight of these endangered fish.

"We are on the verge of completely losing the natural heritage of the San Juan River", says John Weisheit, Living Rivers conservation director, "and unless something is done very quickly the San Juan River will become a graveyard rather than a productive nursery for these unique native fish."

The Bureau of Reclamation (BuRec) has released a Draft Environmental Impact Statement (DEIS) proposing flow modifications for Navajo Dam to help in the recovery of habitat for these native fish species, but this can't work.

The major issue is not flows from the dam, but the loss of habitat and the river's natural dynamic processes. San Juan River endangered fish must be able to spawn high enough in the river channel, such that hatchlings can become sufficiently strong prior to being flushed into Lake Powell reservoir and consumed by non-native fish. "The only way to remedy this situation is to move forward with the decommissioning alternative for Navajo Dam," adds Weisheit.

Also not comprehensively addressed in the DEIS are the issues concerning the traditional medicine people of the Navajo Nation. Says Thomas Morris of the Diné Medicinemens Association, "Navajo Dam has flooded and desecrated many of our sacred and holy sites. The traditional ways of the Diné have not been respected and these sacred sites must be restored. The traditional people have not been consulted in this public process and we look forward to a future meeting to seriously discuss what is good for the long-term interests of the Diné people, including productive alternatives for the Navajo Indian Irrigation Project and the Navajo - Gallup pipeline.

Other defficiencies in BuRec's analysis include:

- The other critical native fish nursery habitat in the San Juan river was inundated by Lake Powell reservoir. Therefore, a comprehensive Environmental Impact Statement of the decommissioning of Glen Canyon Dam must also be undertaken to properly evaluate recovery options for San Juan River endangered fish.

- BuRec's proposed alternatives were based on experiments that yielded no demonstrated recovery of native fish, and are based solely on meeting water delivery contracts within the San Juan system and to maintain non-native trout habitat for sport fisherman.

- BuRec does not sufficiently evaluate the impacts of potential future diversions on endangered fish habitat. The Animas-La Plata Project, Navajo-Gallup pipeline and further expansion of the Navajo Indian Irrigation Project will significantly reduce flows necessary for recovery of San Juan River endangered fish habitat.

- The decommissioning of Navajo Dam will provide a net financial gain to Federal taxpayers, as the primary beneficiary of Navajo Dam is the Navajo Indian Irrigation Project, which receives subsides averaging $1.5 million annually because of the project's inefficiencies.

- BuRec makes no provisions for addressing the predation of native fish by non-native fish such as Catfish and Stripped Bass.

- BuRec makes no provisions for mitigating the impacts on endangered fish habitat from pollutants found in the river, such as PCBs, mercury, DDT, selenium, chlorine and chlordane.

The San Juan River Basin Recovery Implementation Program has failed to restore a self-sustaining native fish population in the San Juan River as it flows through New Mexico, Colorado and Utah, and these new proposals offer more of the same.

Restoration of the river ecosystem can be implemented by simply creating programs that conserve water in our communities and farms. Such programs will save money, taxes and increase productivity while saving the natural and cultural heritage of the San Juan River.

Living Rivers Currents 10/01/02

Desalting Plant: Future Still Uncertain

Since it was built in 1977, the Yuma Desalting Plant (YDP) has loomed as the primary threat to the Cienega de Santa Clara, a 14,000-acre wetland in the Colordo River delta that survives on agricultural runoff from the US. Now the Bureau of Reclamation (BuRec) is preparing a report to Congress, nearly two years overdue, regarding the fate of the desalting plant and, with it, the fate of the cienega.

The YDP has never been used due to high operating costs. Were it to be fired up, it would use and divert all the water that currently feeds the cienega. Presently, the costs are still too high to justify operation, even with the intense demand for water in the basin. BuRec itself estimates that desalting water at the YDP would cost an estimated $318 to $463 per acre foot. By comparison, subsidized farmers in the area pay as little as $3.50 per acre foot and most municipalities pay less than $70 per acre foot.

The first draft of BuRec's report recommends that the cienega's water be offset at this time with such options as: "leasing water from willing sellers, investing in advanced irrigation techniques to reduce use, or obtaining non-systems supplies from groundwater and other sources." Although fiscal concerns are the paramount reason for the recommendation, Living Rivers and other advocates have made the cienega enough of an issue that its survival is noted as a benefit to keeping the YDP mothballed. Living Rivers is also pointing out that decommissioning the plant altogether could save taxpayers an additional $5 million annually. BuRec is planning to incorporate this input into the next draft of its report.

LR in the News 10/02/02

Citizens oppose draft statement proposal to protect fish

By Laura Banish/Staff writer for Farmington Daily Times

FARMINGTON Objection to a federal water-flow plan was expressed loud and clear by local citizens at a public hearing Tuesday at the Farmington Civic Center.

The Draft Environmental Impact Statement proposed by the Bureau of Reclamation provides seven alternatives for operating Navajo Reservoir. Also included are the potential effects of implementing the proposed flow recommendations necessary to provide sufficient releases of water at the times, quantities, and durations necessary to conserve two endangered fish species native to this area, the razorback sucker and the Colorado pikeminnow.

The document was prepared in compliance with the National Environmental Policy Act. The recommendations were provided by the San Juan River Basin Recovery Implementation Program.

"I have received numerous calls about the statement and none of the concerns are positive," said Commissioner Karen Stevens, of the State Game Commission. She said she attended the meeting to express her worry that the proposed water flow rates will hurt local fisheries.

Stevens was not alone in addressing the concerns for fishing industry, with representing the fishing community being the most verbal at the meeting.

"I have an objection to the whole thing. It took seven years to study, three years to compile, and I can't make sense of it," said Tim Jimmerman, of the San Juan Fly Fishing Association.

He said he did not believe any of the alternatives would save the endangered fish, and that the new release levels would decrease populations of other fish in the San Juan River.

Jimmerman argued that by harming fish such as trout, the BOR's recommended water flows would kill not only the fish, but the area's fishing industry as well.

Farmington city attorney Jay Burnham said he agreed that the new flow releases could have an unfavorable effect on recreational uses of the river and cause economic hardships for those who profit from the industry.

Burnham said the city has submitted information regarding how the flow levels will impact hydropower in the area. He said that although he has not reviewed the statement extensively, it appears the flow rates will reduce the effectiveness of Farmington's hydroplant, and thereby have a negative impact on both water and air quality.

If there was anyone in the audience who should have been in favor of the impact statement, it would have been the two men representing the endangered fish, who attended the meeting dressed as the species they were defending, but even they were against it.

"This whole issue about pretending to care about the fish is a complete charade," said Owen Lammers, who spoke on behalf of the razorback sucker, and the fish conservation group Living Rivers. Lammers, and his partner in trying to save the two species, John Weisheit who was dressed as a Colorado pikeminow argued that the water flows would not benefit anyone's interests, and the only way to save the fish is to decommission the Navajo Reservoir altogether.

"Attempting to manipulate nature will always fail," Lammers said. He said that if the bureau truly has intentions of saving the fish, they will abolish operation of the reservoir and dam.

BOR representatives said the idea of decommission is both unreasonable and impractical.

Of the 23 people who voice their views, only one man was in support of the alternative suggested by the BOR.

"No one sees the big picture. Everyone has to take a cut in one respect or another, and while it's hard to defend the BOR, this is the best alternative," said Stanley Pollack, who serves as legal water counsel for the Navajo Nation in Windowrock, Ariz.

He said that of the seven alternatives, one must be selected, and the water release rate plan preferred by the BOR is the best one in respect to satisfying the needs of everyone with interests in the reservoir.

The BOR's preferred alternative for protecting the endangered species in addition to meeting other requirements of the dam, is the 250/5000 plan. Under this strategy, releases would range between 250 and 5000 cubic feet per second on a case-by-case basis. Bureau representatives said the modifications would help the fish and enable water development to occur in compliance with applicable laws, compacts, decrees, and Native American trust responsibilities.

"This reaction is pretty much what I expected," said Ed Warner, BOR resource division chief. He said that of the three public hearings scheduled in the Four Corners area this week, he anticipated San Juan County residents to voice the most heated objections. Other meetings will be held today in Durango, Colo., and Thursday in Bluff, Utah.

Aside from dissatisfaction with particular sections of the impact statement, one of the most frequent complaints was that there was not enough time to examine the 600-page document.

The draft was released for a 60-day public comment period beginning Sept. 3.

Warner said that while he could not make guarantees, an extension of the review period may be considered.

As of now, the bureau will accept written comments from the public until Nov. 4., and a final draft of the statement is expected to be finished by April 28, 2003.

The draft in its entirety can be viewed on the bureau's Web site at www.uc.usbr.gov

Laura Banish: laurab@daily-times.com

Take Action 10/03/02

SAVE GRAND CANYON FROM GLEN CANYON DAM

COMMENTS NEEDED BY NOVEMBER 1, 2002!

Glen Canyon Dam is causing tremendous harm to the Colorado River in Grand Canyon National Park. All native insect species are gone, as are four of eight native fish, otters, muskrats, and the native vegetation in high water zones. There are two public comment opportunities underway until November 1, 2002 that Living Rivers hopes you will consider taking part in.

- Grand Canyon National Park is undertaking a revision of its Colorado River Management Plan
- The Bureau of Reclamation is proposing new experimental operating guidelines for Glen Canyon Dam.

Neither of these programs are seriously addressing the needs to remedy the harm brought to Grand Canyon's river ecosystem by Glen Canyon Dam. Please click on one or both of these topics to learn more and where to direct your letters.

Take Action 10/07/02

Help Protect Colorado and San Juan River Native Fish

COMMENTS NEEDED BY DECEMBER 4, 2002!

The Bureau of Reclamation is accepting public comments on plans to reoperate two of its dams with the objective to restore habitat for Colorado and San Juan River native fish. Unfortunately, neither of these plans will do an adequate job, and without your help these most unique of desert fishes will be headed further down the path to extinction. Please consider lending your comments to one or both of these dam reoperation plans.

Click on the appropriate issue for further details.

- Reoperation of Navajo Dam on the San Juan River to aid in recovery of endangered Colorado pikeminnows and razorback suckers in the San Juan River between Navajo Dam and Lake Powell reservoir

- Reoperation of Glen Canyon Dam to aid in recovery of endangerd humpback chub in Grand Canyon National Park

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River News 10/08/02

RRFW Riverwire - PIPELINE PROPOSED AT BADGER RAPID

October 8, 2002

Grand Canyon National Park could be opened up for a major water development to collect, pump and pipe water from the Colorado River to the Black Mesa and Kayenta coal mines in northern Arizona in a last minute change to legislation sponsored by Senator Jon Kyl. A pipe would be constructed down Jackass Canyon to draw water at Badger rapid. The Bureau of Reclamation is expected to announce soon a proposal for a water pumping and pipeline project. Full environmental review would not be required, according to another of the bill's changes.

"This is an extraordinary invasion of Grand Canyon National Park which clears the way for tearing up the shoreline, building water treatment and pumping plants, and constructing a pipeline in one of the world's greatest natural areas," said Rob Smith, Southwest Representative for the Sierra Club in Phoenix. "The Colorado River belongs in Grand Canyon National Park, not in a coal slurry pipeline."

Unrelated legislation seeking to resolve water rights for the Zuni Tribe and other water users on the Little Colorado River – S. 2743 – was introduced by Senator Kyl in September after four years of negotiations without any Grand Canyon water project provisions. But a new section was quietly added to the bill in Senate Indian Affairs Committee last week to provide water for a pipeline to the coal mines from the Grand Canyon without any notice or public hearings on the issue.
"The Grand Canyon water project has nothing to do with settling the Zuni's water rights, and should be removed from this bill," said Smith. "There are other alternatives to solving the Hopi's water problems which don't involved sacrificing the Grand Canyon to the coal industry."

The amended bill authorizes water to be leased to Salt River Project (SRP) and removed from the Colorado River "between Lake Mead and Lee Ferry" to be used "only for mining related purposes…and for slurrying coal from the Black Mesa and Kayenta Coal Mines."

SRP operates the Navajo Generating Station near Page, Arizona, which gets coal from the Kayenta mine, and is partial owner of the Mohave Generating Station at Laughlin, Nevada, which currently uses water from an underground aquifer to slurry coal from the Black Mesa mine to the power plant. The Hopi Tribe has opposed pumping more underground water for the coal slurry because springs and streams have dried up on the reservation.

River News 10/09/02

RRFW Riverwire - PIPELINE LANGUAGE STRICKEN

October 9, 2002

You did it! Good work!

Thanks for your help on killing the Grand Canyon pipeline deal of an otherwise acceptable--and unrelated--water settlement with the Zuni Tribe!

Title II was the offending section, and the state's Senator has stricken the pipeline language from this legislation. The Senate offices ask that folks cease calling.
Water law appears to prohibit Arizona water to be used for a Nevada power plant. Also, any water used in lower basin states must be drawn from below Lees Ferry, which is the dividing line.

While Senate staffers argue that the language doesn't actually authorize construction, it opens the door to a very bad idea, and why create the opportunity if the project should never be built in the Grand Canyon?

Stay tuned. Peabody and the Salt River Project are still trying to work out the water deal somehow to benefit the Mohave power plant and keep the Black Mesa mine open. Likely, this concept has not been killed, just delayed.

LR Press Release 10/10/02

Announcing Colorado Riverkeeper
Inaugural Patrols Getting Underway This Week

Contact:
John Weisheit, Living Rivers: 435-259-1063; mobile, 435-260-2590
Alisa Hilfinger, Waterkeeper Alliance, 914-674-0622, x208

The international Waterkeeper Alliance of New York and Living Rivers of Arizona and Utah, announced today the establishment of Colorado Riverkeeper, the first on-the-water advocacy and restoration program for the Colorado River watershed.

With rafts, canoes and kayaks, Colorado Riverkeeper will be patrolling the watershed to better document the growing violations of federal environmental laws caused by dams, diversions and excessive water consumption, and use these findings to support litigation strategies to have these laws enforced.

Colorado Riverkeeper will also be mobilizing the basin's extensive commercial and private river running community to take part in advocacy programs to ensure enforcement of environmental laws and to return the natural ecological viability to the Colorado River watershed.

"We're delighted to have joined forces with Living Rivers to advance this rapidly growing model of river advocacy in the watershed that National Geographic described last month as one of the most troubled water sources in the world," said Robert Kennedy, Jr., president and founder of Waterkeeper Alliance. Since 1999 Waterkeeper Alliance has helped form a network of nearly 100 similar water advocacy programs in the US and abroad.

"Waterkeeper's arrival on the Colorado couldn't come at a better time considering the rapidly advancing decline of its unique desert river habitat," says John Weisheit, who will head up the Colorado Riverkeeper program for Living Rivers. "Their network's incredible track record of on-the-water advocacy and precedent-setting litigation on behalf of rivers and aquatic ecosystems across the country is something we fully plan to continue here on what has become the most developed river system in the country."

Colorado Riverkeeper's initial priority will be addressing major violations of the Endangered Species Act caused by a system of more than 40 major dams. The Colorado River through Grand Canyon National Park, for example, has had its native ecosystem destroyed due to the operations of Glen Canyon Dam. The river corridor's entire food web has been transformed, four of the eight native fish species are now extinct, and otters and muskrats can no longer survive.

"I first rafted the Grand Canyon nearly forty years ago, and am appalled that the US Bureau of Reclamation and other federal agencies have allowed the ecological integrity of this internationally acclaimed river corridor, and designated World Heritage Site, to be so severely devastated. Just like the return of the Peregrine Falcon and California Condor to the Canyon's skies, it's now time to ensure the recovery of endangered species to the Canyon's river," adds Kennedy.

Colorado Riverkeeper launched its first patrol of the Colorado River in Grand Canyon on Tuesday, and Friday a patrol will be launched that will cover sections of the Green and Colorado Rivers above Lake Powell reservoir.

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For electronic information:

LivingRivers

WaterkeeperAlliance

Living Rivers Currents 10/11/02

Volume 2, Number 6, October 2002

The Articles

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LRC V2, N6, October 2002

Living Rivers Currents 10/11/02

Temperature Rising: Modifications Proposed for Glen Canyon Dam

In an attempt to finally honor the 1994 recommendations of the Fish and Wildlife Service concerning the endangered native fish in Grand Canyon, the Bureau of Reclamation (BuRec) is considering constructing a mechanism to increase the water temperature released from Glen Canyon Dam.

The purpose of this modification is to warm the water sufficiently to stimulate the reproduction processes of these desert fish in Grand Canyon National Park. The proposed temperature control device (TCD) would provide a mechanism to draw water from near the surface of the reservoir where the water is consequently warmer. When the TCD was first proposed in 1999, concerns were raised by the scientific community

about how non-native fish (for example, striped bass) from Lake Mead or Lake Powell reservoirs could affect newly hatched endangered fish.

Another concern is that the warmer water will alter the food base. Glen Canyon Dam has changed the river's natural warm-water food base into an exotic, cold-water food base. It will take time for the ecosystem to respond to the warmer water, which could cause subsequent food shortages for the endangered fish.

There are a total of eight vertical intake tubes that feed water to the generators at Glen Canyon Dam. It has been proposed that five of the eight tubes be retrofitted to include a total of three intakes on each tube, the main intake 230 feet down, another near the top of the reservoir, and the third in between. The total cost is estimated at 60 million dollars. Environmental review is moving forward with a final decision to be made around October of 2003.

"We are confident that this experiment will work and I support this endeavor wholeheartedly," says Wayne Cook, executive director of the Upper Colorado River Commission. "The only way we will know that success can be achieved is to build the infrastructure and to see how the ecosystem responds. If it works, then the money was well spent." Concerned citizens who have been monitoring the efforts to save Grand Canyon's endangered fish are not convinced that such an adaptive mitigation plan will work satisfactorily.

Says David Haskell, former science director of Grand Canyon National Park, "The water temperature leaving the dam is 30 degrees below optimal for successful reproduction of endangered humpback chub. It is highly unlikely that the TCD, as envisioned by BuRec, will be able to raise the water temperature enough to benefit the survival of the chub. The time needed to design, build and test this device will take several years–years the humpback chub may not have."

Living Rivers Currents 10/11/02

Pipeline Proposed to Divert Water from Grand Canyon

In early October, Arizona Senator John Kyl attempted, unsuccessfully, to secure Congressional authorization for the construction of a major pumping plant and pipeline from the Colorado River in Grand Canyon National Park. The water would principally be used to slurry coal from the Black Mesa coal mine on the Navajo and Hopi reservations to the Mojave Generating Station coal-fired powerplant near Laughlin, Nevada. Coal is presently being slurried from the mine with groundwater from the two reservations. This, however, is significantly depleting the drinking water resources for the Hopi tribe, which desires an alternative water source or mechanism to be used to transport the coal. While Kyl did not succeed during this session of Congress, the concept remains alive

and well, as the Bureau of Reclamation told Living Rivers Currents that it was preparing a feasibility study for such a pipeline.

The proposed site of extraction, Jackass Canyon, lies eight miles below Lee's Ferry, where Grand Canyon river runners begin their expeditions. The facility would pump nearly 3,000 gallons per minute from the river, up 1,000 feet, and then eighty miles across the Navajo Reservation to the Black Mesa coal mine.

California condors can often be found perched on both sides of the Colorado River at its confluence with Jackass Canyon. Over the past decade public and private efforts have aggressively worked to maintain a successful reintroduction program for this endangered species. Jackass Canyon also contains one of the few sets of dinosaur tracks known to exist in Grand Canyon National Park. Despite these potential impacts, Senator Kyl's proposed legislation would have exempted this project from environmental review as required by the National Environmental Protection Act.

Living Rivers Currents 10/11/02

Habitat Security Back in Action

Living Rivers' Habitat Security Force was called into action again this month, challenging the Bureau of Reclamation's (BuRec's) misguided proposals for improving habitat conditions for native fish in Grand Canyon National Park and on the San Juan River below Navajo Dam. At meetings in Farmington, New Mexico and Flagstaff and Phoenix, Arizona, Living Rivers expressed concern that BuRec is continuing to demonstrate a lack of any serious interest in recovering endangered native fish in the Colorado River watershed.

As the only advocates for native fish amongst the 50 participants in the Farmington meeting, Living Rivers made it clear that nothing short of decommissioning Navajo Dam could yield any significant recovery. "This is nothing but make-believe," Living Rivers executive director Owen Lammers told the crowd. "The necessary distance in natural flowing river miles for native razorback suckers and Colorado pikeminnows no longer physically exists because of Navajo Dam upstream and Glen Canyon Dam downstream." The river current flushes any young native fish into Lake Powell, where they are consumed by non-native fish before having a chance to mature. Native fish either need the opportunity to spawn back in their native habitat above Navajo Dam, or Lake Powell must be drained for successful recovery to occur.

The majority of other remarks made at the hearing concerned impacts of any operational changes on the non-native recreational trout fishery below the dam. "The razorback sucker has lived here for thousands of years; it will figure out how to survive, but we need to protect the trout," one commercial fishing guide stated.

BuRec's Glen Canyon Dam public meetings in Phoenix and Flagstaff the following two days were huge blemishes for citizen participation. With barely one week's notice, and no advance copies of its environmental assessment available for the public to review, less than a dozen people not directly involved with BuRec's activities attended the combined meetings. "These meetings represented the first opportunity in years for the public to learn about and comment on BuRec's plans for Glen Canyon Dam and Grand Canyon, and they succeeded in doing everything possible to keep the public out," adds Lammers.

At issue were new flow recommendations from Glen Canyon Dam to help conserve sediment and disrupt non-native fish reproduction, so as to benefit recovery of the sole remaining population of humpback chub in Grand Canyon. BuRec is also planning to remove up to 20,000 non-native trout near the humpback chub rearing areas to reduce predation. With humpback chub populations down to just 2,000 fish, Living Rivers pointed out that such efforts are too little too late, and more aggressive measures need to be reviewed.

Somewhat surprisingly Randy Peterson, director for BuRec's Glen Canyon Dam Adaptive Management Program, was publicly combative toward Living Rivers representatives, stating, "Your rhetoric is not helpful...your views irrelevant," and "you should check your [dam decommissioning] baggage at the door." BuRec is clearly becoming increasingly frustrated with the growing public concern for its lack of progress, and its resistance toward doing the bare minimum as required by the Fish and Wildlife Service (see reverse side).

There is still time for the public to weigh in with written comment on both these issues until November 1, 2002. Contact Living Rivers or visit our website for details.

Living Rivers Currents 10/11/02

Dam Flows Fail to Help Grand Canyon Native Fish

In 1994 the Fish and Wildlife Service (FWS) recommended that Glen Canyon Dam be operated in a manner more consistent with the Colorado River's natural flow regime in order to protect native fish in Grand Canyon. The Bureau of Reclamation (BuRec) ignored these recommendations and implemented an operating regime that would provide greater benefits for hydroelectric power production. Now, in a new report released on September 30, 2002, FWS in association with Northern Arizona University again recommends the critical need for dam operators to heed FWS' 1994 recommendations.

Titled *Monitoring and Research: The Aquatic Food Base in the Colorado River, Arizona During 1991-2001* the 225-page report stated, "We recommend a decade of the Seasonally Adjusted Steady Flow alternative, with spring beach building flows as climate permits....We feel these flows in combination with alien fish suppression and

thermal modification of GCD (Glen Canyon Dam) could make Grand Canyon a sanctuary for native fishes of the Colorado River basin."

BuRec claimed that its preferred operating plan, known as Modified Low Fluctuating Flows, would potentially generate a major increase in the Canyon's aquatic food base, but according to the report, this has not happened and, in fact, the food base is very unstable. "The food base responds negatively to peaking hydropower flows and therefore, this same response applies to native fish and their habitat."

With native humpback chub populations down 75 percent during the study period, it's quite clear that BuRec's efforts are failing. But despite this science-based validation of FWS's 1994 recommendations, no immediate actions by BuRec are being contemplated, just more experiments.

Living Rivers Currents 10/11/02

Colorado Riverkeeper Launched at Living Rivers

The international Waterkeeper Alliance of New York has selected Living Rivers to establish the first on-the-water advocacy and restoration program for the Colorado River watershed. With rafts, canoes and kayaks, Colorado Riverkeeper will be patrolling the watershed to better document the growing violations of federal environmental laws caused by dams, diversions and excessive water consumption, and use these findings to support litigation strategies.

Colorado Riverkeeper will also be mobilizing the basin's extensive commercial and private river running community to take part in advocacy programs to ensure enforcement of environmental laws and to return the natural ecological viability to the Colorado River watershed.

"We're delighted to have joined forces with Living Rivers to advance this rapidly growing model of river advocacy in the watershed that National Geographic described last month as one of the most troubled water sources in the world," said Robert Kennedy, Jr., president and founder of Waterkeeper Alliance. Since 1999 Waterkeeper Alliance has helped form a network of nearly 100 similar water advocacy programs in the US and abroad.

"Waterkeeper's arrival on the Colorado couldn't come at a better time considering the rapidly advancing decline of its unique desert river habitat," says John Weisheit, who will head up the Colorado Riverkeeper program for Living Rivers. "Their network's incredible track record of on-the-water advocacy and precedent-setting litigation on behalf of rivers and aquatic ecosystems across the country is something we fully plan to continue here on what has become the most developed river system in the country."

Colorado Riverkeeper's initial priority will be to complement the work Living Rivers is undertaking to document violations of the Endangered Species Act caused by the Colorado's system of more than 40 major dams. The Colorado River through Grand Canyon National Park will of course be a major priority. The river corridor's entire food web has been transformed, four of the eight native fish species are now extinct, and otters and muskrats can no longer survive.

"I first rafted the Grand Canyon nearly forty years ago, and am appalled that the US Bureau of Reclamation and other federal agencies have allowed the ecological integrity of this internationally acclaimed river corridor, and designated World Heritage Site, to be so severely devastated. Just like the return of the peregrine falcon and California condor to the Canyon's skies, it's now time to ensure the recovery of endangered species to the Canyon's river," adds Kennedy.

Colorado Riverkeeper launched its first patrols the week of October 7, with one traveling down the Colorado River through Grand Canyon and the other down the Green River through Canyonlands National Park and Cataract Canyon, finishing on Lake Powell reservoir. Overall, Living Rivers' Colorado Riverkeeper program will be establishing a network of patrols spanning over 1,000 miles, including sections of the Green, San Juan and Yampa Rivers, as well as the Colorado mainstem. To participate in the Colorado Riverkeeper program, including traveling on one of the patrols, contact John Weisheit at Living Rivers.

River News 10/14/02

RRFW Riverwire - NO MORE FREQUENT FLOATING?

Sources indicate that planners in the River Permits Office in Grand Canyon National Park may be considering yet another avenue to limiting the number of trips taken by self-guided boaters not on the waiting list to one trip in a given period.

This new rule, if imposed, would apply only to exactly those participants who can help make trips safer, richer in Canyon lore, and more environmentally aware; that is, non-commercial boaters who have been down the Grand Canyon before.

At the same time, the Park continues to discriminate in favor of commercial guests (who can go as many times as they can afford in time and money), and in favor of commercial employees, who are, of course, the most frequent users of the river, and who are not barred from using non-commercial slots for themselves even if they have taken several commercial trips that same year.

There are already 2 rules that limit repeating a trip: 1. Non-commercial participants may take only 1 trip while they are on the waiting list (a minimum of 12 to about 20 years). 2. Anyone unlucky enough to be included on a trip in which the permit passes from the

original to an alternate trip leader will be thrown off if they have made a non-commercial trip in the past 4 years, including the alternate trip leader.

The timing is troubling: Is GCNP suggesting changes that are plainly biased in favor of commercial operations just as the CRMP process is getting underway? This kind of pro-commercial rule proposal erodes public confidence in the Park's ability to produce a river plan that will benefit anyone but the river industry and its wealthier clients.

According to the statistics furnished on the River Permit Statistics handout (www.nps.gov/crmp), repeaters filled about 19% of the trips slots during the nearly 4 years from 4-98 to 1-01. Similar data for commercial operations do not appear on Park handouts, but information from the mid-nineties shows that commercial crew fill 18% of commercially-launched seats. That is, the experienced-to-passenger ratio is about the same for both commercial and non-commercial trips.

Unfortunately, even Draconian new rules may not move the waiting list much faster. If trip vacancies are filled by non-repeaters, there will be no change. Of course, to keep expenditures down, cost-sharing non-commercial trips that lose a passenger or two will try to find replacements--if time allows. But even if those vacancies are not filled, rough calculations indicate the wait could be shortened by four years or less from the current 19+ years by turning the user days into new permits.

Having an experienced Grand Canyon passenger on your trip list sets you up for possible GCNP rule changes aimed at reducing your choice of companions as well as your safety and enjoyment, in the slim hope that these "forced cancellations" might create space for some more trips. Some non-commercial trips would go with less-than-optimal qualifications, increasing the chance for situations in which NPS and commercial staff can criticize the conduct of non-commercial trips. Additionally, there could be a huge increase in cancellations if permittees feel unqualified to conduct their trips with little or no experience, and therefore cancel their trips.

RRFW sincerely hopes this information is incorrect and such a new rule is not being considered.

RRFW has also heard that about 300 unused commercial user days may be turned over to the do-it-yourself sector this year according to the terms of the court settlement agreement.

LR Press Release 10/30/02

Glen Canyon Dam experimental flows a waste of public resources
New Environmental Impact Statement needed to address dam decommissioning

Contact: John Weisheit (435) 259-1063

In a letter delivered today to the Bureau of Reclamation (BuRec), Living Rivers demanded the agency abandon its proposed experiments aimed at restoring endangered fish habitat in Grand Canyon National Park.

"It's unbelievable that BuRec is attempting to feed the public such pseudo-science as a recipe for fixing the mounting problems Glen Canyon Dam is causing to Grand Canyon National Park," said John Weisheit, Living Rivers conservation director.

Earlier this month, BuRec released an environmental assessment outlining new experimental operating criteria for Glen Canyon Dam. Living Rivers' letter emphasized that one of BuRec's main goals, to improve habitat conditions for endangered fish by transporting sediment, is dead on arrival.

- For the past three years there has not been sufficient sediment in the Paria River to warrant the proposed experimental operations.

- Even were such sediment available, it is not enough to counteract the loss of 95% of Grand Canyon's sediment and nutrients now trapped behind Glen Canyon Dam.

- The timing BuRec has selected for its special habitat flows is five months in advance of when native fish could benefit. Most of the habitat created would be eroded away by the time young fish might be available to use it.

"If BuRec were serious about addressing the sediment problem, it would be discussing how to get more sediment from behind the dam into the system, not merely proposing flow regimes for sediment that is no longer there," adds Weisheit.

Living Rivers' letter also points out how BuRec's continued unwillingness to honor the opinion of the Fish and Wildlife Service represents a major reason why the endangered fish population in Grand Canyon National Park continues to decline. A recent report issued by the Service reiterates its 1994 recommendation that flows into Grand Canyon National Park from Glen Canyon Dam more closely mimic the river's natural flows. BuRec has been unwilling to implement such recommendations due to resistance from hydropower interests.

Because endangered Humpback Chub populations have declined so precipitously over the past decade, down to just 2,000 adult fish, and that four other native fish along with otters and muskrats have now disappeared from Grand Canyon's river corridor, Living Rivers is calling on BuRec to immediately undertake a full Environmental Impact Statement on Glen Canyon Dam's impacts to Grand Canyon, including the evaluation of the dam's decommissioning as one alternative to achieve habitat restoration in the Canyon.

LR Letter 10/30/02

Comments on Glen Canyon Dam experimental flows

Mr. Randall Peterson
Bureau of Reclamation, Upper Colorado Region
125 South State Street, Room 6107
Salt Lake City, Utah 84138-1102
Via Fax: 801-524-3858
Re: Proposed Experimental Releases from Glen Canyon Dam and Removal of Non-Native Fish, Environmental Assessment

Dear Mr. Peterson,

Living Rivers appreciates this opportunity to submit the following comments on the Environmental Assessment (EA) concerning proposed experimental releases from Glen Canyon Dam and removal of non-native fish from Grand Canyon National Park, September, 2002.

Living Rivers is keenly aware of the rapidly declining Humpback Chub populations, as well as other Grand Canyon native fish species, caused by the operations of Glen Canyon Dam. While the purpose of this EA is in response to the need to modify the operations of Glen Canyon Dam and to test methods to mitigate these impacts, the proposed actions, especially as they pertain to sediment retention and habitat-building, are fundamentally flawed. Of critical concern, this EA does not evaluate any alternatives for meeting sediment needs blocked by Glen Canyon Dam into the Grand Canyon river corridor.

Adequate attention to sediment retention and augmentation experiments for native fish in Grand Canyon necessitates a full Environmental Impact Statement (EIS) not the cursory analysis undertaken in this EA. Such an EIS must fully evaluate the decommissioning of Glen Canyon Dam as an alternative. The need for such an EIS stems far beyond the issue of sediment, but to all aspects of the dramatic decline in Grand Canyon Humpback Chub populations. The reduction to just 2,000 adult Humpback Chub constitutes significant and new information to that which was evaluated in the 1994 Fish and Wildlife Service Biological Opinion, and 1996 Final EIS on Glen Canyon Dam operations.

Lastly, as stated in our letter of September 25, 2002, the public review process for this proposed action has been wholly unsatisfactory. The Bureau of Reclamation (BuRec) and its Adaptive Management Program for Glen Canyon Dam (AMP) must overhaul its procedures for public participation.

1. <u>No sediment to justify experimentation</u>

The EA focuses on utilizing experimental flows from Glen Canyon Dam to manage sediment for the benefit of Humpback Chub populations. However, there has been, and

may not be during the proposed experimentation period, much sediment to manage. Thus, such experimentation may not occur at all. Ninety five percent of the historic sediment load for Grand Canyon native fish remains trapped in Lake Powell reservoir. In the best of conditions, such experiments as proposed in the EA, could manage only five percent of what would exist in natural conditions. However, this five percent has not proven sufficient to provide the turbidity and food base needs for the Humpback Chub. Furthermore, recent sediment inflows from the Paria River, the principle source for this remaining five percent (and the proposed experiments), have been the lowest since 1923. The EA did not report this. Such sediment inflows are not sufficient to allow for the proposed experimentation, and thus will in no way benefit the Humpback Chub.

Sediment is a key missing component for advancing the recovery of native fish in Grand Canyon (Rubin, et. al., EOS v83, n25, 2002). However, the EA focuses on flow releases to transport the sediment without insuring the availability of sufficient sediment to aid recovery. BuRec must therefore address through an EIS process methods to augment the remaining sediment inflows.

2. Climate change and the associated effects on long-term habitat improvement

The EA ignores climatic factors that will effect the proposed experimental releases. As noted above, without significant sediment augmentation the anticipated input of sediment and nutrients for the Colorado River main stem in Grand Canyon may not occur. Scientists from the US Geological Survey (USGS) have reconstructed the historic climate conditions for the Colorado River basin. Their reports indicate that a sustained severe drought could lie before us and that such a climate regime would jeopardize resource management challenges. (Hereford and Webb, 2002).

Another climatic factor that inhibits the proposed conservation strategies is below normal levels for Lake Powell reservoir; specifically reservoir levels set below the spillway portals. Presently, the spillway portals are perched above the reservoir, which will not provide for experimental flows above 45,000 cfs. If below average inflows into Lake Powell reservoir continue, resulting in additional elevation decreases, maximum discharge could be reduced an additional 50 percent or more. Such discharge rates would be ineffective to transport sediment as called for in the EA, even were such sediment available for transport.

3. Timing of spike flows and sediment deposition will provide no benefits to native fish rearing

Under ideal circumstances, fall sediment inflows from the Paria River will be conserved through low flow dam releases until January, at which time a spike flow is to occur in an effort to build beaches and habitat for the rearing of Humpback Chub. However, previous experiments have revealed that much of this habitat disappears within six months of the spike flow. Since rearing Humpback Chub would not be available to utilize such habitat until five months following the spike flow, it makes little sense to time such flows so far in advance. To be of any benefit, such spike flows should be timed to coincide with the natural high flows entering Lake Powell reservoir.

4. Proposed flows ignore Fish and Wildlife Service opinion for the recovery of Humpback Chub

The EA states that the present flow regime from Glen Canyon Dam (Modified Low Fluctuating Flow or MLFF) has failed to benefit the habitat of the Humpback Chub. This conclusion came from data provided by the Grand Canyon Monitoring and Research Center (GCMRC) (Coggins and Walters 2001), which concludes that a dramatic reduction in the Humpback Chub population has occurred since this flow regime was implemented.

This flow regime was selected as the preferred alternative by the Secretary of Interior despite objections by the Fish and Wildlife Service FWS in its 1994 Biological Opinion. That opinion specifically stated that the MLFF alternative would "likely destroy or adversely modify designated critical habitat." FWS recommended the alternative known as the Seasonally Adjusted Steady Flow (SASF). FWS in conjunction with the Department of Biological Sciences at Northern Arizona University, reiterated these recommendations in their September, 2002 report, Monitoring and Research: The Aquatic Food Base in the Colorado River, Arizona during 1991-2001 (Benenati, et. al.). This report states, "We recommend a decade of Seasonally Steady Flow alternative, with spring beach building flows as the climate permits and unlimited hydropower ramping within 10% of the predicted seasonal mean. We feel these flows in combination with alien fish suppression and thermal modification of GCD could make Grand Canyon a sanctuary for native fishes of the Colorado River basin."

The proposed experimental releases outlined in the EA will continue to conflict with these recommendations in two ways. First, as noted above, the habitat-building releases do not occur at the preferred time-period of the annual, historic snowmelt, to which these native fish are naturally attuned. Second, the prescribed fluctuating flows for non-native fish suppression would disrupt the food supply for the native fish species. Additionally, the EA does not sufficiently analyze the impacts to other habitats, with their associated species, caused by experimental releases inconsistent with the river's natural hydrograph.

5. Supplemental EIS needed

The proposed actions in this EA, either separately, or in combination with other actions contemplated by BuRec and AMP, are not seriously addressing the precipitous decline of endangered Humpback Chub in Grand Canyon National Park. This decline, described by Coggins and Walters, while not surprising given lack of management activities on behalf of the Chub, was not anticipated when the Record of Decision was signed. The population has been considered to be fairly stable over the last decade or more. Therefore, under National Environmental Policy Act (NEPA) regulations found at 40 CFR 1502.9(c)(1)(ii), these new data represent "significant new circumstances or information relevant to environmental concerns," triggering a requirement to prepare a Supplemental EIS (SEIS) to the 1996 Glen Canyon Dam EIS. The Bureau of Reclamation, the National Park Service, and other agencies are likely in violation of the Endangered Species Act and the Grand Canyon Protection Act for failing to ensure

protection and recovery of the Humpback Chub population in Grand Canyon National Park. BuRec, in conjunction with National Park Service, and other relevant agencies, should immediately begin work on such an EIS for the full recovery of the Humpback Chub populations in Grand Canyon National Park. Such an EIS must address all issues affecting the Humpback Chub including: temperature, sediment and nutrients, flow conditions and non-native fish impacts. Most importantly, the EIS must evaluate the decommissioning of Glen Canyon Dam as one of the alternatives to meet Humpback Chub recovery objectives.

6. Public review process

BuRec did not fully comply with the spirit of the public review process as outlined by NEPA. Less than ten days notice was given prior to its two public meetings. No notification was mailed out in advance of, or subsequent to, these meetings. As a result, less than a dozen people not directly affiliated with the activities of BuRec or the AMP attended the combined meetings. The EA was not made available to the public in advance of these meetings. With the exception of those few who attended the first meeting in Flagstaff, Arizona, to obtain a copy of the EA, most others were afforded less than 30 days for which to formulate and submit comments.

The AMP is charged to fully involve the general public in its activities. We request that in the future BuRec assert greater diligence in the future concerning public participation and ensure that ample time is given to the public to learn about, and become engaged in, those activities pertaining to the operations of Glen Canyon Dam, and its associated impacts to Grand Canyon National Park.

In conclusion, Living Rivers finds this EA and the experiment proposed pertaining to sediment, an unfortunate waste of public resources. The crisis facing the Humpback Chub in Grand Canyon is quite serious, but it has yet to be taken seriously by BuRec and the AMP. The proposed habitat-building experiment is unlikely to materialize due to lack of available sediment. Even if such sediment were available, it would not be distributed in a timeframe to benefit the Humpback Chub. Regardless, such sediment would be insufficient to mitigate the loss of 95 percent of sediment and nutrients now trapped behind Glen Canyon Dam. This EA further demonstrates BuRec's and AMP's unwillingness to follow the recommendations of FWS, and as a result, will lead to the further declines in the Humpback Chub populations in Grand Canyon National Park. BuRec must abandon this EA and proposed experimentation and conduct a full EIS on new operating regimes for Glen Canyon Dam, including decommissioning, to fully recover endangered fish habitat in Grand Canyon National Park.

Thank you for the opportunity to submit these comments and recommendations.

Sincerely,

John Weisheit
Conservation Director
Living Rivers

River News 0/31/02

RRFW Riverwire - CRMP COMMENT DEADLINE TOMORROW

You knew we would be nagging you. The deadline for comments is through the end of tomorrow, Nov. 1st. Urge your friends and family to comment. This is everyone's park!

The email address is: grca_crmp@nps.gov

Please include a sentence on any or all of these topics, or others of your own interest: Grand Canyon National Park must be at the forefront in protecting the ecosystem. The canyon is in catastrophic decline due to the dam upstream. Species are gone or on the brink of disappearing. The park cannot depend upon the Bureau of Reclamation and other government agencies to protect the canyon, but must speak up in its defense.

The park must protect all of the great Park's intact biological communities, natural processes, and archeological treasures. Preserve and protect the wilderness character of the Colorado River unimpaired for future use and enjoyment as wilderness.

The park must provide outstanding opportunities for solitude and a primitive recreational experience--without the use of motorboats. The peace and tranquility should not drown in clamor of crowds or the racket of an outboard motor. Remove motors from the river.

Motorboats are not as safe as oar-powered craft, nor do they provide economical trips as claimed by some river concessionaires. They simply allow corporations to crowd more people onto noisy boats to rush through the Canyon.

The park must end the launching of up to 7 parties a day (only 1 or 2 of these are non-commercial), even out the launches and distribute use throughout the seasons to reduce crowding and congestion along the wilderness river.

There must be a reform of the current concession services and provide fairer access and affordable trips to include a broader representation of citizens. It is grossly unfair that non-commercial river runners must wait up to 20 years to get a trip permit.

The park must eliminate noisy, intrusive helicopter passenger exchanges. The use of helicopters should be limited to life and health-threatening emergencies, or essential administrative imperatives.

River News 11/04/02

RRFW Riverwire – WILDERNESS WITHOUT THE RIVER?

River Runners for Wilderness (RRFW) has recently learned that the Grand Canyon River Outfitters Association, their legal council and staff from the Grand Canyon Trust have been on Capitol Hill, to gather support for a Grand Canyon Wilderness bill that excludes the river.

Tom Martin and Jo Johnson of River Runners for Wilderness took the opportunity while in Washington for the Colorado River Management Plan Scoping Meetings to inform congressional staffers about the progress of the open public CRMP process. Also participating in the informational meetings were members from the Arizona Wilderness Coalition, The Wilderness Society, American Canoe Association and American Whitewater.

Jo Johnson noted “Our purpose was to educate staffers on the Colorado River Management Plan process and ask their help in assuring the process would go forward unimpeded by surprise legislation, as happened when the Hatch Appropriations Rider was passed in 1980. So you can imagine our astonishment when we learned about the river concessionaires activities.” Several congressional staffers confirmed they had been visited one month earlier by the outfitters group and the Trust to gather support for a possible Grand Canyon Wilderness bill that excludes the river.

“We are right in the middle of the most intensive on-going public process for managing the Colorado River in over twenty years, driven by a legal settlement to complete the planning process in time to award new river concessions contracts. It’s alarming that the river concessions would be considering a legislative end run around the public process at this time” noted Tom Martin.

Wilderness Management of the Colorado River in Grand Canyon is whole-heartedly embraced by the American public. Wilderness management is also supported by the Wilderness Act and National Park Service policy. It is unfortunate that wilderness management has been fought at every step of the way by the river concessionaires and their allies. It's clear America wants a river wilderness, especially in Grand Canyon. Wilderness areas in the country strictly control for-profit private business activities, both in minimizing the amount of guaranteed access the private businesses are allowed, and in making sure America’s motor free heritage is preserved.

River News 11/06/02

RRFW Riverwire – NEW WESTWATER RESERVATION SYSTEM

Westwater Canyon, a popular 1- to 2- day river trip, will be accessed through a new method of permit issuance this year. Chad Niehaus, Recreation Planner for Bureau of Land Management's Moab River Office explained: "We wanted to reduce cancellations and maximize the available use in Westwater Canyon while making the reservation system more user-friendly".

The website at www.blm.gov/utah/moab/ww-info.html features an online calendar of available launches, updated daily. Prospective permittees may call to reserve their date up to two months before their desired date—the call-in date is conveniently listed for each date. "We tried this on launch dates in the secondary season last year," Niehaus said, "and it worked well enough for us to apply it to the main season."

The previous annual lottery which was held early in the year was apparently not well suited to Westwater Canyon, which requires less planning lead time since it can be run as a day-trip and is a relatively short drive from several metropolitan areas. The cancellation rate was high and the River Office was increasingly forced to phone permittees to find out if permits would be used. Unused spaces were released as available permits, but often with little lead time.

The River Office is hoping to decrease administrative costs of river permitting. "There will still be "crunch" times when the phone lines will be jammed" acknowledged Niehaus, "but overall, this system should work much better for everyone." Westwater's method has not been used before, but if successful, other river permitting agencies may incorporate elements into their own permitting systems. There has been a lot of interest in the details by planners in other locations, according to Niehaus.

River News 11/23/02

RRFW Riverwire - 2002 RIVER INCIDENT UPDATE

The primary river season for the Colorado River in Grand Canyon National Park has drawn to a close. Below is a list of reported river incidents.

Non-commercial river runners reported 9 incidents; six incidents required helicopter evacuation. Three were on-the-water boating accidents, one was an in-camp accident, and two were the result of dehydration. The remaining three incidents were a flash flood in Havasu Canyon that caused minor trauma to 2 individuals who stayed on the river, a runaway from a trip in which poor group dynamics was reported, and a rock slide which caused property damage only.

There were 41 commercial concessionaire river incidents, thirty of which required NPS evacuations. Three were evacuated at the Whitmore Helipad to the Bar-10 Ranch, and went on to Las Vegas hospitals. There were eighteen medical incidents, twenty four trauma incidents, and five incidents categorized as “other”. One person was checked by rescue personnel, and was found to be fine.

Also reported on commercial trips were a snakebite, five dehydration incidents (a decline from last year), five day hike injuries, four boat accidents, an in-camp accident, and two people who were injured when they jumped off a boat. There was one river guide fatality. One incident involved a bone that had been collected by a guide and stored for 1 month in an ammo can. A commercial passenger (a doctor) thought the bone to be human and gave it to the trip leader, who turned it into NPS rangers.

The 41 commercial concessionaire river incidents reflect an overall increase from the annual average of 34 incidents.

In addition to incidents handled by GCNP, there were 5 calls for assistance by hikers or non-commercial boaters that were handled by concession crews.

LR Letter 11/27/02
Comments supporting PWC ban on Lake Powell reservoir

Kitty Roberts
Superintendent
Glen Canyon National Recreation Area
Attn: PWC DEIS
P.O. Box 1507
Page, AZ 86040
Via Fax: 928-608-6212

RE: Comments on National Park Service's Draft Environmental Impact Statement and Personal Watercraft Rule-Making for Glen Canyon National Recreation Area

Dear Superintendent Roberts:

Living Rivers respectfully submits the following comments on the National Park Service's Draft Environmental Impact Statement (DEIS) and personal watercraft (PWC) rulemaking for Glen Canyon National Recreation Area (GCNRA).

PWC use is an extremely important issue facing the National Park Service, and GCNRA specifically. Unfortunately, while other Park Service units have addressed it as such, the DEIS reveals a cursory analysis by GCNRA, which lacks compliance with the National Environmental Policy Act (NEPA) process in an effort to justify a preferred alternative that does little to address the concerns which triggered this NEPA process.

1. No data to support conclusions relating to Alternative C.

Throughout the EIS there are references to Alternative C which state "by the end of the ten-year analysis period, most former personal watercraft users would have returned to the recreational area with other motorized watercraft." This unsubstantiated conclusion is used to support the supposition that implementing Alternative C would not significantly affect air quality, water quality, noise, visitor experience, etc. over the medium to long term. The DEIS contains no data or analysis to back-up this prediction. There is, however, data presented in the DEIS that indicates that the opposite can be anticipated, allowing for extensive and permanent reduction of impacts.

Although not stated, but clearly supported in the data presented in the DEIS, is that the overwhelming majority of PWC use at Lake Powell reservoir is associated with the use of other vessels, such as powerboats and/or houseboats. Only a small percentage of PWC users at Lake Powell reservoir employ PWCs as their primary vessel. On page 126 the DEIS states that 32 percent of groups visiting Lake Powell use PWCs, while 84 percent use powerboats and 29 percent use houseboats. It also states that 39 percent of the houseboat groups and 25 percent of the powerboat groups include at least one PWC. This means that 11 percent of the groups on the reservoir have houseboats and PWCs and another 21 percent of the powerboat groups have PWCs. Combined this represents 32 percent of the groups on Lake Powell reservoir—the same figure for PWC groups stated in the DEIS. Because some groups contain houseboats, powerboats and PWCs, this calculation may yield a slightly exaggerated figure. However, the percentage of such three-craft groups is likely rather low, else it would have been included in the data presented in the DEIS. If, as the DEIS states, 32 percent of all groups employ PWCs, and 32 percent—minus some small amount—of all groups use PWCs with powerboats and/or houseboats, it is clear that PWC use is significantly tied to the use of these other watercraft.

Therefore, like waterskis, wakeboards and other recreational equipment, PWCs represent merely one form of recreation associated with the collective activities of groups using other vessels. Permanently banning PWC use does not necessarily mean that these powerboat and houseboat groups will utilize an additional vessel, merely that they will have one less recreational activity associated with their time on Lake Powell reservoir. While many of these users will continue to take part in motorized reservoir activities, there is no data or analysis presented for why these groups will necessarily incorporate additional watercraft to replace PWCs. Nor is there any evidence to suggest that there would be a one-to-one relationship over time to the replacement of PWCs lost with other vessels. Lastly, there is also no evidence to support that the small percentage of groups that only use PWCs will use the reservoir at all, given that their preferred activity is permanently banned.

Absent evidence to the contrary, it is clear that the analysis of Alternative C is significantly flawed, grossly misleading the public as to the actual social and environmental benefits associated with a permanent ban of PWCs on Lake Powell reservoir. A much more likely scenario is that any change in motorized use on the reservoir will occur at a pace consistent with current trends, absent the use of PWCs.

2. Alternatives A and B are arbitrary.

As illustrated in Table 18 on page 131 the areas proposed for PWC restriction in alternatives A & B constitutes low use areas on Lake Powell reservoir by PWCs. These proposals provide limited benefits to the visitor experience relative to more than 190 other side canyons that are to remain accessible to PWCs from Lake Powell reservoir. Such a limited selection is arbitrary and capricious. The fact that these areas may have had PWC restrictions associated with them in the past, should not render them the sole locations for the development of alternatives. Similar problems with noise and competing uses, which represent the primary justification for the presentation of Alternatives A & B, also occur at Navajo, Antelope, Moqui, Lake and many other side canyons inundated by Lake Powell reservoir. These areas must be given equal, if not greater consideration, in the analysis of alternatives, not be systematically ignored.

3. Insufficient justification for eliminating alternatives from further consideration.

Page 61 states that limiting PWC use to the main channel of Lake Powell reservoir would be, "...inconsistent to the objectives of the recreation area as defined in its enabling legislation. The objectives of the recreation area are to manage the area so that it provides maximum recreational enjoyment to the American public and its guests... ."

Limiting PWC use to the main channel in no way compromises a visitor's recreational enjoyment. PWCs are not primarily used for transportation to other recreational opportunities/locations on Lake Powell reservoir. As stated in the DEIS, PWCs are "high-performance vessels designed for speed and maneuverability and are often used for stunt-like maneuvers." So long as the Park Service provides for this opportunity at a reasonable number of locations, there would be no conflict with the spirit of the enabling legislation. Furthermore, as the user group analysis in Section 1 above illustrates, the vast majority of PWC users are accompanied by other vessels, therefore they can gain access to all other areas on the reservoir where other forms of power boating is allowed. Lastly, while PWCs may afford access to some areas too small for other vessels, such areas constitute the precise types of locations that generate substantial conflict with non-motorized users, and thus should warrant a ban on PWC access.

4. Only alternative C ensures compliance with federal law.

The National Park Service Organic Act states that Park resources are to be managed so that they remain "unimpaired for future generations." The allowances for PWCs into the GCNRA has indeed caused such impairment. The Park Service attempts to justify PWC use as consistent with GCNRA's enabling legislation. However, the 1972 enabling legislation was not able to predict the evolution of these vessels, and the profoundly negative impact they would have on these "future" generations. Unlike other forms of powerboating on Lake Powell reservoir, PWCs contribute significantly to water, air and noise pollution, and more specifically, to the derogation of the visitor experience throughout the reservoir. The 1978 Redwood Act states that there should be no "derogation" of Park resources, yet GCNRA has taken no steps to restrict this relatively new, and growing source of conflict for visitors to Lake Powell reservoir.

While the 1979 GCNRA General Management Plan's mission may be to "...provide maximal recreational enjoyment to the American public and their guests..." this does not allow for one form of recreation to increasingly detract from others. Maximal enjoyment must allow for a threshold, particularly in light of increasing demands for non-motorized activities in the reservoir's many side canyons. GCNRA may encompass more than 1.2 million acres, but the side canyons and tributaries feeding the reservoir's mainstem are amongst its most spectacular assets and must be managed accordingly. Only Alternative C provides for the management requirements consistent with federal law, and therefore should become the preferred alternative.

5. Lake Management Plan

The DEIS states that within Alternatives B & C that GCNRA will "seek funding for the development of a Lake Management Plan." This should be a component of all alternatives. Moreover, the term "seek funding for" does not provide sufficient assurances that such funding will ever be obtained. GCNRA should make the development of a Lake Management Plan a priority, and commit to getting it done, not merely alluding to it pending the outcome of uncertain resource allocation decisions. Additionally, such a plan must explore placing similar restrictions on powerboats and houseboats as those being contemplated for PWCs.

In light of the above, Living Rivers believes the only viable alternative outlined in the EIS is to make permanent the current PWC ban on Lake Powell reservoir, by implementing Alternative C.

Sincerely,

Owen Lammers
Executive Director

LR in the News 12/01/02

A tale of two dams
Bureau of Reclamation anniversary has special significance in valley

By Joe Rowley for the The Herald Journal

Through several dryer-than-normal years much of the West, and Utah especially, has been trying to keep from choking on its own thirst. And during the past year the U.S. Bureau of Reclamation has been celebrating its 100th anniversary of trying to quench that thirst.

But at the same time, there have been cries raised for rivers to be returned to their natural state and dams to be torn down. Others have simply called for more scrutiny in water development projects. In the middle of it all the Hyrum City Council last month

passed a resolution making clear their support of Bureau of Reclamation projects and their condemnation of those who would tear down the concaved concrete walls.

That resolution raises the question: What is the bureau's legacy in Cache Valley?

Bob Parson, Utah State University Archivist in USU Special Collections takes a personal interest in local water and valley history. He said the bureau has been very active on the Bear River almost from its creation in 1902.

Two water storage projects in the county owe their existence to the Bureau of Reclamation, Hyrum Dam and the expansion of a much older, much smaller Newton Dam. While there have been criticisms of the efficacy of some bureau projects, the two reservoirs here, Parson said, live up to expectations better than most.

That is because the pioneers who settled the valley had already constructed an irrigation infrastructure leaving only the need for greater quantities of water to make the valley more arable. The ditches and canals already dug throughout the valley made it easier to make dams that could efficiently deliver water, Parson said.

The Bureau of Reclamation's stated purpose is making land more arable, or suitable for producing crops, reclaiming the arid lands of the West. But when the bureau was created in the early 21st century there was an agenda behind that purpose: Encouraging people to move West and spread out, said Jay

Henrie, Deputy Area Manager in the bureau's Provo office.

Reclamation projects are spread throughout 17 western states beginning at the eastern boarders of Texas, Oklahoma, Kansas, Nebraska and the Dakotas.

Newton Dam especially holds a prominent position in the history of American irrigation, if not merely some interesting insight into the settlement of the valley. Parson said Newton is believed to be the first dam in the state. His statement is backed up by bureau literature on the project, which goes as far as to say that it may have been the first large body of irrigation storage in the nation.

Settlers founded Clarkston early in Cache Valley history and began tapping Clarkston Creek to water their fields. When a splinter group of settlers moved down stream to found New Town, later Newton, they quickly found there was not much water left in the creek when Clarkston people finished with it. So they built a dam to store what little water came downstream, Parson said.

That was in 1872 and the total capacity was only 1,566 acre-feet.

"The new reservoir was woefully inadequate," Parson said. "People began talking about building a bigger dam almost as soon as it was completed."

The bureau turned its eye to expanding Newton as early as 1918, but it wasn't until 1946 that a larger dam was completed a mile-and-a-half downstream. The reclamation project increased the capacity to 5,600 acre-feet.

Before working on Newton the bureau worked on the Little Bear River just south of Hyrum, building the larger of its two projects in the valley. Hyrum Dam was similar to Newton's in that it was the local landowners who really pushed for it, and dissimilar from many projects of today for the same reason.

"Today you can't build a dam because they're too expensive. There's too much mitigation, too many interest groups," Parson said. "In the 1920s there wasn't (all that). It was mainly the irrigators and they all rallied around the cause."

Hyrum Dam's 18,800 acre-feet capacity of water now provide supplemental irrigation to more than 6,300 acres and $1 million worth of crops, according to bureau data.

Hyrum reservoir acts as an effective catch-basin for spring runoff because of its large drainage area, Henrie said. Nearly 220 square miles above the dam drain into the Little Bear River. The drainage is so large, in fact, that Henrie said it's a rare year when the reservoir doesn't fill up, even during dry spells.

Hyrum Dam is "incredibly successful" as a Bureau of Reclamation project, Parson said. Without Newton Dam, that part of the valley would all be dry farm.

But there are tradeoffs in water storage projects.

Besides the land that gets inundated under a reservoir, the summer-time flow in the river is kept artificially high and turbulent, creating more sediment in the water. Without low-water times when vegetation can move down the bank and secure the dirt with its roots, the river banks erode more quickly, Parson said.

The real criticisms of the Bureau of Reclamation, to which the Hyrum city resolution refers, come from people like Owen Lammers and his Moab-based grassroots action group, Living Rivers.

Lammers accuses the bureau of being unwilling to enter the 20th century. While stopping up rivers and storing water may have been effective in the past, he said that is often no longer the case. The bureau is trying to squeeze more water out of the rivers than they have to give, and in planning future projects the bureau is finding more water on paper than really exists, he said.

Not only that, people better get used to the state they're in now. Lammers said the recent dry spell is really a taste of what normal precipitation levels are and that the West is in for even drier periods. The bureau is doing nothing to address that threat, he said.

"(There's) a huge social reality that we do not have enough water to meet the obligations that the agency is making," Lammers said. "The agency continues to spend its time trying to adapt rivers to meet our consumption. What we really need to begin to do now - because the rivers have no more to give - is adapt our consumption to the rivers."

Lammers also accuses the bureau of being unwilling to adapt to a greater social interest in the environment. When it was created 100 years ago, he said, there was little public concern for environmental and wildlife habitat issues.

Living Rivers promotes large-scale river restoration, including the Colorado River Basin, and is one of the primary groups pushing for the drainage of Lake Powell. Lammers and his group would like to see Glen Canyon Dam decommissioned, along with some other Bureau of Reclamation projects.

Keeping the water in Lake Powell is actually being wasteful because as much as 10 percent of the lake's capacity is lost during the year through evaporation and seepage into the sandstone, Lammers said. If the water were allowed to flow free the full amount would be available for use during the year. Storage for downstream users would not be a problem because Nevada's Lake Mead, held back by the Hoover Dam, is large enough for the purpose.

When it comes to being proactive in water conservation, Lammers said the bureau has a strong authority that it refuses to exercise. As the apparent watermaster of the West, the bureau could mandate planting patterns to support more water-efficient crops. It could dictate what farmers grow with the water it releases, he said.

For example, half of the water released from bureau systems is used to raise alfalfa, which requires 30 times as much water to get one pound of protein for cattle as other sources of vegetable protein, Lammers said. If the bureau mandated cropping patterns that didn't include alfalfa it could free up 35 percent of the water for other uses.

People need to "begin to work in balance and harmony with the system and not continue to pretend that we can technologically cheat it," he said.

"Why can't (the Bureau of Reclamation) take that same creativity and vision that they had to destroy rivers and put it into addressing the current problems of the day," Lammers said.

The Utah Rivers Council offers a more moderate view of the Bureau of Reclamation. Utah Rivers Council Executive Director Zach Frankel makes a distinction in saying that he is not an environmentalist, he is only a member of the public.

"That's why we're not on the Lake Powell thing, that's just not our cause," Frankel said.

His view of the bureau is a federal agency that should be subjected to increased scrutiny. To unilaterally say "the bureau is good" or "the bureau is bad" is not wise, he said. But as a major user of the United States' tax base, Bureau of Reclamation projects should be scrutinized on a case-by-case basis.

A good example of scrutiny can be seen in the recent defeat of the proposed Honeyville and Amalga dams, though they would not have been bureau projects. The two dams were removed from a list of future Bear River projects after farmers and non-farmers alike fought against them. The dams would have covered prime farm land along as

much as 13 miles of the Bear River and would have provided water to only Salt Lake urban communities, Frankel said.

"They weren't tree huggers, they were farmers and ranchers and Shoshone tribe members," Frankel said. "They were also tax payers. They felt like, 'Why should Salt Lake take Box Elder and Cache counties' water when the farmers depended on it for their lifeblood?'"

While those and other dams may not be in the best interest of the community, there are others that are, Frankel said. There is a large difference between the proposed Honeyville and Amalga dams and the Hyrum and Newton dams, he said.

"Hyrum Reservoir is a different beast. Farmers need water to irrigate and people need food to eat," he said.

What really needs to be done is create more dialogue in water development, Frankel said, rather than allowing one federal agency to make all the decisions.

Henrie said the bureau has altered some of its practices since 1970 to meet the change in public interest. What used to be projects coordinated between the local entity and the federal government has now begun to involve more public input, he said.

As for Cache Valley, there will be no more Bureau of Reclamation projects here. Anywhere the bureau works, it is there at the invitation of the state, Henrie said. Thirty years ago Utah lawmakers decided the state should take charge of future water development on the Bear River.

Whether 2002 was indeed the fourth year of a drought cycle, or just a taste of a reality to come, the benefit of Hyrum Reservoir to the nearly 200 farms it feeds prompted the Hyrum City Council to express its support of reclamation projects.

"Cache Valley has endured another year of drought thanks to the foresight of those who planned and built the reservoirs holding our precious water supplies," Mayor Gordon M. Olson said in a written statement.

In the resolution and the letter, Olson and the city accuse those who call for the decommission of dams shortsighted. Olson wrote that they ignore the economic benefit of having water held back by dams and they don't worry about the 10 million acres of farmland to which reclamation projects supply water, not to mention the $4.3 billion they add to the economy.

LR Letter 12/04/02

Navajo Dam re-operations on the San Juan River

Mr. Ken Beck
Bureau of Reclamation
Western Colorado Area Office
835 East Second Avenue, Suite 400
Durango, CO 81301
Via Fax: 970-385-6539

Re: Navajo Dam Operations, Draft Environmental Impact Statement

Dear Mr. Beck

Living Rivers appreciates this opportunity to submit the following comments on the Draft Environmental Impact Statement (DEIS), Navajo Dam Operations, September 2002 (DES-02-35).

The San Juan River is one of the most dynamic ecosystems on the planet, supporting an incredible diversity of endemic plants and animals, as well as native cultures. We are quite concerned with the demise of its native fish species, but believe with proper river management, full recovery of these species is achievable.

It has been acknowledged that the two prime reasons why San Juan River native fish are endangered can be attributed to alien fish competition and the building of dams and diversions. Despite this, the DEIS provides little assurances that these impacts will be adequately addressed, such that recovery can occur. In particular, Living Rivers finds the 250/5000 alternative recommended in the DEIS to be totally unacceptable as a means to achieve this objective.

First, while the DEIS acknowledges that endangered species have yet to achieve a "positive population response" from the present flow regime, it none-the-less recommends continuing with the same regime. In fact there has been little to no benefit whatsoever to the endangered fish populations as a result of present dam operations.

Since it's not working now, and the DEIS provides no evidence to ensure that it will work in future, it seems imprudent to make permanent such a flow regime. Furthermore, it seems imprudent for the DEIS to be making any recommendations at all, as the final report of the Biological Committee has yet to be issued.

Second, without recognition of the need to: increase the length of the habitat reach through effective fish passage and potential dam decommissioning; mandate mechanisms to ensure sufficient in-stream flows in light of existing and proposed diversions and climate change; and aggressively eliminate non-native fish and plant threats to the habitat, it is unlikely that full recovery of razorback sucker or Colorado pikeminnow will ever occur in the San Juan River. Failure to adequately address these critical issues, not only threatens the validity of preferred alternative, but all alternatives presented in the DEIS. The comments which follow address these deficiencies within the EIS in greater detail.

1. Truncated reach too short to enable recovery

Historic habitat for the native San Juan River fish included the spawning beds above Navajo Dam and the sections now inundated by Lake Powell reservoir. The critical habitat identified by the DEIS on the San Juan River is substantially less, the distance between Lake Powell reservoir and Navajo Dam. Furthermore, this remaining stretch is truncated even further by a number of diversion projects.

The only remaining critical habitat, of the native 320 river miles, available for fish recovery is the San Juan River which lies between Hogback Diversion Dam and the head of Lake Powell reservoir, approximately 138 miles. Included in this 138 miles, are the 57 miles of swift water at San Juan Canyon, which is documented as habitat not advantageous for the rearing of native fish. Therefore the total available habitat for fishes that once ranged throughout the San Juan River and its tributaries has been reduced 75 percent to a mere 81 miles.

The DEIS does not demonstrate how this remaining habitat is sufficient to accommodate the rearing of native fish. There are two kinds of habitat that are needed by the native fish of the San Juan River: spawning habitat and rearing habitat. It has been demonstrated that spawning habitat is available for the fish to utilize, but that rearing habitat for the hatchlings has been severely diminished, as most of the hatchlings drift into Lake Powell reservoir to be predated upon by the exotic fish. It has been suggested by aquatic biologists that historic habitat was available to the drifting hatchlings in the lower river reaches of the San Juan beyond Clay Hills and in the areas of the Colorado River mainstem.

While the preferred alternative does call for combined flows from Navajo Dam and the Animas River to drop to 500 cfs, this may not be sufficient to halt young fish from being carried down to Lake Powell reservoir, and anything lower would reduce the backwaters habitat, which is even more critical for their survival. The success being experienced with fish recovery on the Green River is largely the result of habitat length. The DEIS fails to address these restrictions on the San Juan River, or the alternatives available to correct them.

First, most of the water diversions do not allow for adult fish passage to enable spawning in the upper reaches of the remaining habitat. This includes the diversions of the Animas River, which is part of the historic habitat of the endangered San Juan River fish. And while a fish passage device has been constructed at the Hogback Diversion Dam, it has not been determined if endangered fish even utilize it.

Second, even should successful fish passage be achieved, there is no evidence that this stretch of river will be sufficient to accommodate the needs of these larval and early juvenile fish. Historically, San Juan River native fish could rely on the free-flowing Colorado through Glen Canyon to provide both rearing habitat for San Juan River native fish, and as a refuge in times when the San Juan River ran dry. Decommissioning Glen Canyon Dam would restore the historic geomorphic habitat that the fish evolved with and would also favorably increase the range and conditions of critical habitat necessary for the recovery of San Juan River native fish.

The DEIS should have: one, identify how successful fish passage will be achieved to maximize availability of the remaining habitat; two, evaluate the effects of Glen Canyon Dam on the San Juan River Basin Recovery and Implementation Program (SJRBRIP); and three, evaluate the decommissioning of Glen Canyon Dam as a legitimate alternative to restore San Juan River native fish populations.

2. Long-term operations of Navajo Dam

At least until such time as Glen Canyon Dam is decommissioned, San Juan River native fish are dependent on Navajo Dam to reduce the likelihood that the remaining habitat will run dry. The DEIS, however, makes no reference as to the impermanence of Navajo Dam, and how its decommissioning, either through dam failure, or sedimentation could effect fish recovery.

Catastrophic floods are known to occur in the drainage of the San Juan River. Navajo Dam's ability to control floods has been called into question due to unexpected piping of reservoir water through the dam's earthen structure (Bureau of Reclamation, Engineering and Research Center, Denver). Such piping has caused other earthen dams to fail, such as BuRec's Teton Dam in Idaho, which caused loss of property and loss of life. The DEIS needs to document the integrity of Navajo Dam, and how, in the event of a dam failure, it would avoid a complete loss the San Juan's remaining, and/or recovered, native fish.

For Navajo Dam to use its river outlet works for extended periods of time during the seasonally adjusted high flows, the EIS must also report on the safety concerns related to cavitation and other potential operating hazards that could occur while using these outlet works (SJRBRIP Coordination Committee Minutes of 10/15/98).

As the San Juan River erodes a geographic area that includes soft host rocks, it is no surprise that it is the major contributor of sediment for the Colorado River system. This high content of sediment poses serious concerns to Navajo Dam operations, and will eventually force the dam's decommissioning. The DEIS must outline the timeframe by

which Navajo Dam will likely need to be decommissioned, and how this decommissioning will effect recovered endangered fish habitat.

3. Water quality concerns & climate change

The DEIS fails to adequately address how it will guarantee necessary in-stream flows. While historically, the San Juan River has run dry, this did not significantly affect native fish populations as they were able to seek refuge in the Colorado River. Until such time as Glen Canyon Dam is decommissioned, such refuge is not available. Therefore, BuRec must ensure water will be available for the fish. This is particularly problematic given the extent of unresolved water claims. While the DEIS recognizes the existence of such claims, and admits in particular that Navajo Nation claims, "if exercised could place in conflict most of the water in the basin," it outlines no mechanism for how the necessary in-stream flows will be guaranteed. Recent history on the Klamath and Rio Grande Rivers reveals that the Bureau of Reclamation has demonstrated an unwillingness to make such flows a priority.

Additionally, the DEIS fails to assess the likely impact climate change will have on water availability. The upcoming year, in particular, may be an eye-opener for resource managers and citizens of the San Juan River system. It is projected that even if the coming year receives normal precipitation, there will not be sufficient water supply to meet the level of demand (Personal communication, New Mexico Game and Fish, 2002.) This is indicative of the over-developed nature of the San Juan River and this issue must be more thoroughly addressed by the DEIS to produce water in times of drought for the recovery of native fish.

Recent reports issued by the US Geological Survey (USGS) specifically indicate that resource managers will have problems meeting their future water delivery projections (R. Hereford, Flagstaff and R. H. Webb, Tucson, 2002). The data indicates:

- The 20th Century was a wetter century than normal by 20.
- The 400-year average virgin streamflow for the Colorado River at Lee’s Ferry, Arizona totals 13.5 million acre-feet per year; 16.4 was the original projection.
- Colorado River virgin streamflow at Lee's Ferry, Arizona can increase or decrease by as much as 35 percent.
- High magnitude floods can stress spillway mechanisms and overflows will damage areas of development; dam failures are possible.

Climate change is becoming an increasingly important issue affecting surface water management, thus it's surprising, in light of the above, that the DEIS did not address it.

The preferred alternative will only work when climate behaves normally and would fail in a severe and sustained drought. The DEIS should have provided the total amount of acre-feet required to conserve native fish species for each alternative, and how this relates to the natural annual flow of the Colorado River. It should have also provided adjusted streamflow statistics on the consequences of climate change. Such analysis is

imperative to properly manage the San Juan River and the conservation goals as outlined by the DEIS.

Lastly, the DEIS did acknowledged water supply constraints in its analysis of the 500/5000 Alternative, stating that it would not be technically feasible to implement due to present diversions. The DEIS failed to state, however, how such an alternative would in fact be of much greater benefit to the native fish, only that it is not feasible. The DEIS did not discuss opportunities for purchasing, transferring or otherwise acquiring the necessary water rights to enable the implementation of this more beneficial alternative.

To be credible, the DEIS should have developed an alternative based on the water needs of the native fish, then determined how to ensure the water availability and flow regimes that will best provide ensure such water is provided on a permanent basis.

4. Insufficient high flows

The maximum flows outlined in the preferred alternative are not sufficient to meet the needs of the razorback sucker. This fish responds very well to spikes in the hydroragh, but the DEIS ruled out flows above 5,000 cfs from Navajo Dam due to the technical constraints associated with the dam's river outlet works. As stated in the Flow Recommendations for the San Juan River, prior to Navajo Dam, spring spike flows of 33,000 cfs occurred at Bluff Utah, 30 percent of the time. However, the preferred alternative will not allow for such spikes. The preferred alternative is based on a calculation of the average spike flow, yet provides no analysis to demonstrate that such a flow is indeed sufficient to invoke the types of benefits necessary for the razorback sucker. Therefore, similar to the need to make necessary engineering modifications to allow for fish passage, the DEIS should have addressed more completely the benefits to razorback sucker recovery associated with higher and more consistent spike flows from Navajo Dam.

5. Removal of alien fish

It is well documented that the introduction of alien fish species has contributed significantly to the decline of the native fish populations in the San Juan River. Members of the Desert Fishes Council have specifically documented their concerns about alien fish impacts on the available resources of food and habitat in our desert rivers (Battle Against Extinction, W. L. Minckley, 1991).

Every alternative presented supports the continued existence of an artificial trout fishery. These fish should be removed because they significantly compromise native fish recovery goals—feeding on the larval and early juvenile native fish. Sport fishermen have alternative venues to pursue their recreation, some nearby where trout are a natural feature of river ecosystems. The native fish do not have such alternatives and are forced to compete for survival in an impossible coexistence. Other alien fish species, such as stripers, catfish and carp, too must be eliminated as opposed to the proposed suppression strategies.

6. Removal of alien plant species

Invasive tree species such as tamarisk and Russian olive need to be more aggressively mitigated with programs other than the mimicry of the natural hydrograph called for in the DEIS. These trees have dramatically changed the geomorphology of river bed, which alters the optimal productivity of the spawning habitat for the endangered fish, as well as the habitat of the endangered birds and some species of special concern. These exotic plants should be eliminated and replaced by native vegetation such as cottonwood and willow.

7. Water quality

The DEIS does not sufficiently address how water quality will be improved such that there will no longer be impacts on native fish. The health of San Juan River native fish is presently being compromised by oxygen sags, lesions from toxic chemicals associated with the production of petroleum products and sewage treatment plants.

This situation is anticipated to worsen as new projects and diversions come on-line. Pollution and heavy metals from return flows will increase, suppressing further native fish productivity. Increased selenium in the soil systems of the drainage is of particular concern, as it is known to shunt the reproduction organs of the endangered fish. Moreover, in the summer of 2001, BuRec published The Low Flow Test: San Juan River, which concluded that the reoperation of Navajo Dam, as called for in the preferred alternative, would not meet New Mexico water quality standards over the long-term.

The DEIS claims that BuRec plans to address these matters through dilution by the recommended flows. However, such flows are already being implemented, and water quality standards continue to be violated. Clearly, this is not a viable solution in the near or long-term. While the DEIS also states that efforts will be made to increase enforcement of non-point source pollutants, it provides no details of how this will occur and how this will necessarily benefit water quality.

8. Water management

The constraints facing the recovery of San Juan River native fish are indicative of a much greater disaster in years to come. The over allocation of the river, unresolved water rights claims combined with lower water volumes due to climate change will lead to extensive conflicts and a dried-up river with regularity. There will be no recovered fish, or water for many of the users that presently have rights. Surprisingly, however, BuRec is doing nothing to resolve this.

In addition to the comments pertaining to water quantity in item 3 above, BuRec must comprehensively address how water from the San Juan River basin will be allocated in such a way that the needs of native fish will not be compromised. BuRec must identify what mandated water conservation and water utilization policies will be enforced on all users to sufficiently reduce their take from the river to eliminate the likelihood of shortages, both for native fish and water users. Such policies will not only resolve many existing and future problems, but save money by eliminating the need for some of the

basin's existing and proposed projects.

Conclusion

Living Rivers has no confidence in the conclusions of the DEIS or any of its alternatives to successfully recover the native fish of the San Juan River. The preferred alternative represents the continuation of present operations, which has yet to demonstrate any results. Additionally, before any alternative can be adequately considered, the DEIS must be significantly expanded to address the likelihood that the current habitat is too short in length to allow for recovery, and alternatives explored to remedy this. The DEIS must also address specific mechanisms to maintain in-stream flows in light of present and anticipated demands on the system, climate change, and the prospect of Navajo Dam failure and eventual decommissioning. The removal of non-native fish and plant species must become a higher priority, as should improvements in water quality.

Alternatives, which may be more beneficial to recovery, such as the 500/5000 Alternative must not be excluded merely because of water constraints. BuRec should identify what's best for the native fish, then determine how to attain it, such as mandated water conservation and acquisition of water rights for the fish. Lastly, BuRec must face the reality that the San Juan is going to regularly run out of water if new water conservation, allocation and management policies are not swiftly implemented.

Sincerely yours,

John Weisheit
Conservation Director

River News 12/09/02

RRFW Riverwire - BECOME A RRFW MEMBER FOR FREE!

December 9, 2002

River Runners for Wilderness invites you to become a member—it’s free!

The Grand Canyon! Do you want to keep it Grand? Do you believe it deserves to be a designated, motor-free wilderness with fair access for anyone that desires to experience its wonders? Don’t have a lot of ready cash, but still care about the issues? RRFW would like to extend a free lifetime membership to you!

Join us by filling out the form on the “join” menu at our website www.rrfw.org, or send us your name, complete address, phone (and fax if you have one), and email address via email at membership@rrfw.org or by mail to River Runners for Wilderness, PO Box 466,

Moab, UT 84532-0466. We'll keep you informed about the latest breaking river wilderness issues with mailing alerts, updates and bulletins.

We've contributed countless hours and quite a few dollars to the wilderness and access causes. In the last 6 months, here's what we've done:

- Issued alerts about moves in Washington DC to strip wilderness protection for the Colorado River, the Jackass Waterline Project, Firewalk group, alleged changes to non-commercial regulations, the Outfitter Policy Act, river fatalities and illnesses, exploring business permits as an alternative to concessions contracts, the new Westwater Permit system, and other important issues.
- Formed the Grand Canyon Wilderness Alliance (GCWA) of 5.5 million members with 30 other environmental groups to craft CRMP comments, participate in the CRMP process and advance a motor free wilderness designation of the Colorado River and Grand Canyon.
- Traveled to DC to educate our elected officials on the CRMP. During 3 days and 17 meetings, we asked our elected officials to support the ongoing CRMP and block any attempted legislation to interrupt it.
- Represented the interests of wilderness paddlers at meetings with BLM planners working on the Gunnison Gorge Management Plan.
- Traveled to Marble Canyon Lodge to attend a summit of individuals and groups exploring common interests and goals for Grand and Glen Canyons, as well as wilderness and educational conferences in Albuquerque and Tucson.
- Sent you up-to-date Riverwires on changes affecting Grand Canyon, from river flows out of Glen Canyon Dam to congressional actions in Washington, DC.

It's free, too. If you're interested in email alerts, email us at riverwire@rrfw.org.

We're happy to have you as a member, and please consider donations to help us cover expenses. We're particularly in need of a few things: postage stamps, 2 fax machines, paper, an Adobe Acrobat® program, a scanner and prepaid long distance phone cards.

We've been careful in spending our money, but long distance phone calls, travel expenses, Internet access, postage and office equipment and supplies add up. Can you help us out? It's fully tax deductible. Thanks!

River News 12/10/02

RRFW Riverwire - CRMP UPDATE: NEXT MEETING IN JANUARY 2003
December 10, 2002

For the first time in 30 years, a concerted effort is underway to address the backlog of recreational issues surrounding the Colorado River in Grand Canyon National Park. Issues such as who gets to go, allocation of use, the spectrum of concessions services,

The Herald Journal wilderness, helicopter and motorboat use issues are on the table. The next step in this process may be a week's worth of meetings in Phoenix, Arizona, at the end of January 2003.

During the summer, park planners once again undertook to move forward the Colorado River Management Plan "with much trepidation", according to park Superintendent Joe Alston. A series of public meetings was held this summer and fall from coast to coast across the nation, generating over 8000 comments from the general public by the close of the scoping comment period November 1, 2002. In an ongoing attempt to include stakeholders in this open public process, the Park is considering three meetings to further allow stakeholder input into the CRMP. These meetings are scheduled to occur at Arizona State University in Tempe, Arizona. The meetings are tentatively planned for January 29, 30 and 31 and may possibly be connected via videoconference equipment to locations at Northern Arizona University in Flagstaff and the University of Arizona in Tucson.

RRFW has learned that there may be two focus group discussions, and two expert panel presentations. The focus groups will be on 1) The non-commercial access system and 2) The spectrum of river concessions services. The expert panels will cover 1) Carrying capacity, group size, and seasonality, and 2) Allocation of use. The findings of these focus groups and expert panels will be used by the Park's CRMP contractor in helping the Park draft several alternatives for the final plan. These alternatives, with one selected as the Park's "preferred" draft alternative are slated to be released during the summer of 2003.

RRFW feels that the final plan would be better served if the Park released a variety of preliminary alternatives for public comment prior to coming forward with a draft preferred alternative. This practice is an accepted management plan process, both within the National Park Service and other land management agencies. Denali National Park released a draft of preliminary alternatives for public review last year, with no preferred alternative selected. The draft with a preferred alternative should be released shortly for a second round of public review. The Bureau of Land Management is currently allowing two weeks of comments on preliminary draft alternatives for a wilderness management plan on the Gunnison Gorge (see www.gunnison-gorge-eis.com). A review of this type allows additional public participation in the crafting of viable alternatives during the planning and development stages. RRFW is encouraging park planners to allow the interested public a similar opportunity for comment on alternative plans prior to the park identifying a draft preferred alternative.

Count on us to keep you informed on CRMP developments and other Grand Canyon issues as they come up.

River News 12/16/02

RRFW Riverwire – COMMENT ON GUNNISON GORGE PRELIMINARY ALTERNATIVES

Gunnison Gorge National Conservation Area (GGNCA) has released preliminary draft alternatives for public comment, due by Tuesday, November 17. This stretch of the Gunnison River flows through a double canyon (2 rims) below Black Canyon of the Gunnison National Park. The Bureau of Land Management-administered area includes a variety of scenery, land uses and recreational opportunities divided into zones for different administration. Of particular concern to river runners is 14 miles of the river as it flows through the small inner canyon Wilderness Area of about 17,000 acres called Zone 1. River runners must hike to the launch area down the 1 mile Chukar Trail and either backpack their gear in or arrange with the approved horse packing outfitter to have it brought down. Consequently, this run is more popular with non-commercial kayakers than rafters. The take out is outside the wilderness boundary on BLM land at Gunnison Forks.

Extensive public and focus group meetings were held during the spring and summer. The GGNCA has released preliminary draft alternatives for its management plan revision. This is an opportunity for the public to be involved before the draft alternatives, usually with a “preferred alternative” chosen by the agency, are released. Current comments will be considered for incorporation into the draft alternatives which are scheduled for release in February, 2003.

Four preliminary draft alternatives are presented. Concerning Zone 1, Alternative A is the “status quo”, or keeping most management aspects as they are now. Currently, there is no formal permitting system for noncommercial boating use and fishing use. Commercial boating outfitters are limited to 2 launches per day, divided among several permitted companies (not concessions). Boating group size is limited to 12 people, regardless of trip type. Currently, a noncommercial trip must pay a small trip fee, read the regulations and sign the self-issued form on behalf of the trip at the Chukar launch site. This applies to non-commercial recreational boaters and fishers.

Carrying capacity has been determined to be 75 people per day in the small canyon. This number is exceeded about 10 days during the stone fly hatch in May and/or June. The group size maximum of 12 has been determined by the size of the existing designated campsites (no camping in non-designated sites). Self guided fishing visitors, when boating, are lumped with recreational boaters, and with backpackers and hikers if they are not using a boat.

Alternative B would keep commercial group sizes at 12, including guides, and would keep commercial launches at 2. Noncommercial groups would be reduced to 8 participants. A non-commercial permit system would be implemented and would allow 4 trip launches per day with a maximum of 6 boats per trip. Non-commercial trip participants would be subject to education of the requirements for travel in the canyon. Fees were not addressed in this alternative. This alternative would establish “use

indicators" and monitor user satisfaction levels, resource degradation and use adaptive management techniques to change policies and procedures to accommodate necessary changes.

Alternative C would use the same adaptive management techniques. Commercial launches would increase to 2 overnight plus 1 day use trip. All group sizes increase to 16 people (including guides for commercial trips). Unlimited guide training trips would be allowed. Two noncommercial trips would be allowed in addition to unlimited day use. Fees were not mentioned.

Alternative D deviates from specific prescriptions for recreational use, and instead creates an opportunity for deeper study and a longer, more intensive process for administering that use. This would be achieved by analyzing current visitation, existing resources and the present outfitter system. Needed changes would be identified and considered to shift allocation of use between trip types and between outfitters. Methods of assessing and monitoring visitor satisfaction and resource protection over time would be developed. A "friend's group" would be formed to assist in management, trail and facilities work, user education and to provide feedback to the BLM.

RRFW believes rules should be applied evenly wherever possible between commercial and non-commercial trips. Therefore, disparities in group sizes, boat limits, and user fees are not justified. The scale of the canyon and river within it are small, and GGNCA has made a good case for establishing the group size of 12 people; an increase for any trip type is not justified. It also is difficult to justify limiting non-commercial use via a permitting system while a substantial amount of commercial allocation goes unused, as happens now. Similarly, noncommercial boaters have not been shown to cause a disproportionate level of resource abuse, making the proposal to require educational programs an unnecessary burden to noncommercial boaters and BLM administrators. Furthermore, few permitting systems in use today are fair or satisfactory to do-it-yourself boaters.

Alternative D creates some exciting opportunities, but at the same time, provides no safeguards that the outcomes will be appropriate. Budgetary and legal concerns could make this a difficult process, and clearly, it will take longer. It appears to be a new concept in draft alternatives, and the GGNCA should be applauded for including it.

The current situation, Alternative A, works nicely for non-commercial boaters. Admittedly, there are resource issues stemming from the increased fishing use during the stone fly hatch season, but boating logistics limit access far more than agency obstacles. RRFW urges GGNCA to postpone formal permitting of non-commercial boaters as long as possible to avoid the substantially increased administrative overhead and dissatisfaction among non-commercial boaters.

The alternatives include much more than the boating issues covered here, we urge you to go to the GGNCA Management Plan website at www.gunnison-gorge-eis.com. To get a detailed Excel spreadsheet of each alternative's boating-related elements, reply to this message and you will receive it as an attachment. Comments are due tomorrow, Tuesday, December 17, 2002. Send them to Angie Nelson at Tetra Tech, Inc. (acting as

a contracted agent to the BLM), by email: angie.nelson@tetratech.com or by fax: (720) 406-9114.

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LR Press Release 12/16/02

Congressman Touts Living Rivers
"Record of Success" at Colorado River Water Users Meeting

(Las Vegas) According to Congressman John Shaddeg, R Phoenix, the greatest threat to the future of Colorado River management is not the forces of nature, or the Southwest's growing population, but the advocacy group Living Rivers.

Throughout the course of his 40 minute address to the annual Colorado River Water Users Association (CRWUA) at Caesar's Palace Hotel, he emphasized the growing power and influence Living Rivers is playing in Colorado River politics.

"These people have a track record of success that is enviable," Shaddeg told the capacity crowd of water agency brass, irrigation district representatives and government officials, who earlier heard remarks by Interior Secretary Gale Norton. "It would be a grave risk or a dangerous gamble to bank on them not winning, because they are more determined, more patient, working hard and growing."

Remarking on Living Rivers' calls for aggressive water conservation strategies, such as mandated cropping patterns that preclude water-wasting, non-food crops like alfalfa, Shaddeg hoped to mobilize opposition to Living Rivers amongst the CRUWA rank and file--the irrigators. Eighty percent of Colorado River water is used for irrigation, roughly half of this is for alfalfa and other forms of cattle feed.

"We are certainly pleased that Representative Shadegg continues to publicize the shifting debate surrounding the Colorado River," says Lisa Force, Living Rivers Program Director who is attending the CRUWA meetings. "It's unfortunate, however, that he tries to mobilize the water users to swim upstream against mounting public opinion. There are only a few hundred Colorado River Water User members; it's the 280 million people in the US who ultimately have a say over this federally-managed river."

Shaddeg was particularly concerned with Living Rivers' Colorado Riverkeeper program, which is affiliated with the international Waterkeeper Alliance based in New York and founded by Robert Kennedy, Jr. "I rue the day when Colorado River water use is decided by the East Coast," Shaddeg said.

Shaddeg, a long time defender of Glen Canyon Dam, reinforced the growing support for Living Rivers' efforts to bring about the dam's decommissioning. "We're hearing this proposal coming from more and more reasonable voices," he said.

Shaddeg alluded to this growing public influence earlier this year when he and three other western Congressman co-authored a fund raising letter for the Page, Arizona-based Friends of Lake Powell. "If there were a vote on the floor of the U.S. House of Representatives tomorrow that called for the decommissioning of Glen Canyon Dam and the draining of Lake Powell, there is a chance that we would lose that vote," the letter stated.

"It's not a matter of if, but when such a vote will be lost," adds Force. "The water loss through evaporation and seepage alone associated with Lake Powell reservoir could service four million people and generate $500 million in revenues for the federal treasury. Properly organized, such urban demand can generate a lot more political clout than a handful of federally subsidized farmers."

River News 12/17/02

RRFW Riverwire – MORE ON GUNNISON GORGE PRELIMINARY ALTERNATIVES

Comments are due today, Tuesday, December 17, 2002, not November 17th as listed in some copies of yesterday's Gunnison Gorge Preliminary Draft Alternatives Riverwire.

Gunnison Gorge NCA has received the results of a user satisfaction survey conducted by Arizona State University over 2 years (2 seasons), according to Bill Bottomly, Planning and Environmental Coordinator at the Bureau of Land Management unit.

"We were happy to hear that recreational users are generally very satisfied with their visits here", he said. There was a notable exception, however. Guests of commercial outfitters were very unhappy with what they perceived as "excessive crowding" of the river canyon during their visits, rating their satisfaction at 2.9 out of a possible 10.

Ironically, GGNCA's boating outfitters are calling for an increase in their launches, currently set at 2 per day, and in their group sizes from the 12 allowed now to 16. They also would like to conduct guide training trips outside of their current allocation instead of using some of their launches for training purposes. This additional use would seem to run very counter to the wishes of their clients.

He also confirmed that Alternative D-1 is a relatively new concept in EIS drafts. "While our status quo, Alternative A, seems to be filling most users' needs, we know that with increased visitation we will have to find better ways to deal with use and safeguard the resource without sacrificing user satisfaction" he stated. "We hope to accomplish with Alternative D".

Alternative D-1 establishes a “Wilderness Recreation Strategy” by meeting 5 specific outcomes: 1) Analysis of visitor use and resources and consideration of the existing outfitter system and noncommercial use, 2) Identify needed changes to existing system to consider additional use by all visitors and possible reallocation of current use. 3) Process for expanding opportunities for new outfitting companies 4) Possible changes to all recreational management to protect wilderness values and 5) Methods of assessing and monitoring visitor satisfaction and resource protection over time.

The alternative would also form a citizens group to assist the BLM with managing the resources, providing feedback on management, educating users, monitoring and improving conditions and providing volunteer assistance with facilities and trails maintenance. Comments are due today. Direct them to: Angie Nelson, Tetra Tech, Inc. , at fax number 720.406.9114 or by email to: angie.nelson@tetratech.com.

Environmental and wilderness laws have established conduits for public involvement and direction in how our lands are protected and used. RRFW urges you to participate in the process when and where you can.

Living Rivers Currents 12/23/02

San Juan River Fish Need Lake Powell Drained

While Glen Canyon Dam’s impacts on the ecosystem at Grand Canyon are well-documented, less publicized are the impacts that Lake Powell reservoir has on critical habitat upstream. Nowhere is this more apparent than on the San Juan River where 20 percent of the habitat has been inundated by the reservoir. The Bureau of Reclamation (BuRec) claims it can remedy these problems by re-operating Navajo Dam upstream, but Living Rivers is leading the effort to reinforce how futile this exercise has been, and will continue to be, until Lake Powell reservoir is drained.

The San Juan River is well-known for contributing about a third of the sediment that historically nourished the lower Colorado River system and its delta. The 355 mile long San Juan River is also one of the most unique ecosystems on the planet, supporting an incredible diversity of endemic plants and animals, as well as native cultures. But, like so many rivers in the Colorado watershed and beyond, the San Juan has suffered tremendously as a result of dams and water diversions.

Of the six native fish species that once thrived in the San Juan, four are species of "special concern," and two are threatened with extirpation. Under pressure from the Fish and Wildlife Service, BuRec has been studying ways to modify the operations of its Navajo Dam facility to improve San Juan River habitat conditions for the endangered Colorado Pikeminnow and the Razorback Sucker. Located 208 miles upstream from where the San Juan River becomes part of Lake Powell reservoir, it is believed that changes in dam operations could bring about the recovery of these native fish.

But, as was acknowledged in a recent Environmental Impact Statement on the operations of Navajo Dam, such flow regimes have yet to achieve a "positive population response." In fact, scientists have concluded that there has been little to no benefit whatsoever to the endangered fish populations as a result of present dam operations. Nonetheless, BuRec recommends continuing with the same regime.

"The problem is they're looking in the wrong direction," says Living Rivers conservation director John Weisheit. "The major constraint is not the need to manipulate flows, but to recognize that the remaining stretch of river is too short to allow for young fish survival."

Historic habitat for the native San Juan River fish included the spawning beds above Navajo Dam and the rearing sections now inundated by Lake Powell reservoir. Navajo Dam, Glen Canyon Dam and the nine diversion dams in between, have reduced river habitat down to 81 miles (a loss of 75 percent). While it has been demonstrated that spawning habitat is available for the fish, the important rearing habitat for young fish is insufficient. Hatchlings drift into Lake Powell reservoir and are consumed by non-native fish before they have sufficiently matured to swim upstream against the current.

Historically, the native fish of the San Juan River could rely on the free-flowing Colorado through Glen Canyon to provide both rearing habitat and refuge habitat when the San Juan River ran dry. Decommissioning Glen Canyon Dam would restore the historic geomorphic habitat that the fish evolved with, as well as increase the range and conditions of critical habitat necessary for the recovery of these incredible fish.

"BuRec is completely ignoring these rearing habitat constraints and the role a decommissioned Glen Canyon Dam must play in eliminating them," adds Weisheit.

"BuRec must stop wasting public monies pretending. They must concede that this remaining habitat is not sufficient to support recovery, and that they will be in violation of the Endangered Species Act until Lake Powell is drained."

Living Rivers Currents 12/23/02

Delta May Suffer from Low-Flowing Rio Conchos

Living Rivers is monitoring a new threat to the people and ecology of the Colorado River delta. In retaliation for an overdue Mexican water debt, the U.S. International Boundary and Water Commission (IBWC) has begun researching the feasibility of stopping Colorado River water from reaching the already parched Baja California.

Under a 1944 treaty, the U.S. must deliver to Mexico an average of 1.5 million acre-feet of water annually from the Colorado River. This represents a scant ten percent of the river's historical natural flow which nourished the delta region before the Colorado was dammed. Although the river basins are geographically unrelated, the same treaty

requires Mexico to deliver to the U.S. an average of 350,000 acre-feet of water a year from the Rio Conchos Basin and other tributaries. Due to an extraordinary drought in the state of Chihuahua, Mexico has fallen behind on its deliveries for two consecutive five-year cycles.

The Colorado River water currently delivered to Mexico is used for irrigation in Baja California and for the densely populated city of Mexicali. What little water is left, to support the environment and the many threatened species of the delta, comes mostly from agricultural runoff, or excess "spills" from U.S. reservoirs during years with above-average runoff. This is an unlikely occurrence considering the current drought cycle.

Gordon Hill, general manager of Bayview Irrigation District in south Texas, said recently, "When I suggested blocking the Colorado more than three years ago nobody—the Clinton administration, the State Department, the IBWC—would look at it. Now, finally, we have come full circle."

The threat has received support from both Texas Agriculture, Secretary Susan Combs, and Texas Commission on Environmental Quality, Chairman Robert Huston. Secretary Combs has called on the Bush administration not only to withhold Colorado River water from Mexico but also to cut economic aid.

Living Rivers Currents 12/23/02

Colorado Riverkeeper Off and Floating

When the Waterkeeper Alliance approved Living Rivers' Colorado Riverkeeper program in October, we quickly discovered that many Colorado River boaters are very eager to advocate for watershed protection and to share that knowledge with the boating public.

By combining environmental advocacy with river running, three patrol trips involving 25 people have already plied 335 miles of the Colorado watershed to spread the protection message by engaging the people they meet on the river, and by monitoring the river reaches for environmental degradation.

The first launch occurred in Grand Canyon National Park and was led by Tom Martin of River Runners for Wilderness. The second Patrol was led by the Colorado Riverkeeper coordinator, John Weisheit, which launched on the Green River above Canyonlands National Park and included the Colorado River through Cataract Canyon. The third trip was led by Susette DeCoster, of Colorado Plateau River Guides, and launched directly below Hoover Dam. These three river trips were completed in areas managed by the National Park Service, where the natural ecology has been heavily impacted by the two largest concrete dams on the Colorado River—Glen Canyon and Hoover Dams.

The Grand Canyon trip began below Glen Canyon Dam, with unnaturally crystal clear and cold water flowing past sediment-starved beaches which, like the river's endangered fish, are barely hanging on to existence.

Where was the missing sediment? In Lake Powell, where the Cataract Canyon patrol ended. These boaters had to endure 30 miles of massive sediment deposits revealed by the lowering of Lake Powell reservoir during the driest period on record for the Colorado River. Their final night was spent on a vast plug of sediment (moist sand/clay topped by tumbleweeds) that rightly belonged in Grand Canyon, 200 miles downstream. Upon arriving at their final destination, Lake Powell's Hite Marina, they found the boat ramp closed due to sediment and the low reservoir level. The alternate ramp had a warning sign that exclaimed, "Use at your own risk."

DeCoster's patrol below Hoover Dam was marked by incredible amounts of pollution, including trash, toilet paper, human feces and odors of human urine, which impacted the camping areas and the natural hot springs for which this river corridor is famous. Additionally, Homeland Security helicopter overflights kept a close eye on all river visitors.

The Colorado Riverkeeper will continue to document the violations they encounter on their patrols and to engage in outreach activities whenever possible. Our next patrols will occur in the coming Spring on the Green and San Juan Rivers. Contact Living Rivers if you would like to take part.

Living Rivers Currents 12/23/02<

Canyon Outfitters Saying No to River Wilderness

Representatives of Grand Canyon National Park's $30 million commercial river outfitting industry are discussing a bill for Congress that would exclude the Canyon's river corridor from wilderness designation. If enacted, this would be a significant blow to efforts to restore the Colorado River in Grand Canyon National Park.

At issue is the use of outboard motors by the majority of Grand Canyon river outfitters. Motorized pontoon boats can accommodate 32 people and whisk them through the Canyon. The designation of wilderness would likely lead to a phase-out of motors, forcing the companies to revert back to smaller oar-powered rafts and traveling at river pace.

This is a major issue now being addressed by Grand Canyon National Park through a revision of its Colorado River Management Plan. Concerned that the outcome of this process might cause their motors to be destined for the scrap heap, the outfitters are considering help from Congress. The Grand Canyon River Outfitters Association is discussing a wilderness bill that only includes the terrestrial portion of Grand Canyon.

"This is a hollow bill which has nothing to do with protecting Grand Canyon and everything to do with preserving profits," says Jo Johnson of River Runners for Wilderness, a project of Living Rivers. Johnson's group and the Grand Canyon Wilderness Alliance, of which they are a part, is concerned that should such a wilderness bill pass, neither the Park Service nor Congress will be willing to challenge outfitters and pursue protection of the river corridor in the future.

"It's unimaginable that the soul of the Canyon would be excluded," says Roderick Nash, author of Wilderness and the American Mind. "This wild corridor of deep time, unique on this planet, deserves the most wilderness-conscious regulation our political system is capable of providing." Certainly the biggest loser would be the Canyon's unique native ecology. According to Kim Crumbo, former wilderness coordinator for Grand Canyon National Park and now with the Arizona Wilderness Coalition, "Designation of wilderness would give the National Park Service a much stronger legal mandate to restore the river corridor back to its pre-Glen Canyon Dam state."

Although Glen Canyon Dam has caused extensive impacts to the river, this in no way precludes the river corridor from wilderness designation, as the criteria for inclusion into the wilderness system is a much lower standard than the criteria for how wilderness is managed once designated. In 1978 Grand Canyon National Park recommended the river corridor as potential wilderness, but it has yet to seek designation, largely due to pressure from outfitters.

According to the Wilderness Act, wilderness designation would compel the Park Service to work toward managing the river corridor in an "unimpaired state," and, "seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species." Such a mandate would allow the National Park Service to challenge the Bureau of Reclamation to go much further in its efforts to mitigate the impacts of Glen Canyon Dam on Grand Canyon. With four of the Canyon's eight native fish gone, and three more just hanging on, such designation, "would be a welcome tool," adds Crumbo.

One conservation group, the Grand Canyon Trust, feels it's inappropriate to pursue wilderness in the river corridor at this time. "We must first work to get the outfitters on our side, then work for wilderness on the river," stated the Trust's president, Geoff Barnard, at a meeting of Grand Canyon activists in November. But according to Johnson and Crumbo, this will never happen. "The outfitters will only get stronger and more set in their motorized ways if we continue to let them off the hook," says Johnson.

Living Rivers Currents 12/23/02

Big Straw Colorado's Pipe Dream

A $500,000 study is being considered by the state of Colorado to determine the feasibility of a project to pump water from the Colorado River, at the Utah border, to the suburbs of Denver. Although officially known as the Colorado Aqueduct Return Project (CARP), it's nickname has become "The Big Straw." Early this month, Living Rivers voiced its opposition to the 600,000 acre-feet diversion at a public meeting held in Grand Junction.

With the federal government now forcing California to start reducing its take from the Colorado River, the state of Colorado is aggressively seeking ways to develop its unused water allocation. Initial costs for the Big Straw have been estimated to be $5 billion. This projection does not include the operation costs, such as the energy necessary to pump the water uphill, nor the costs to mitigate the environmental damage. Pat Mulhern, a civil engineer speaking at the meeting stated "I'm not yet convinced that this project is economically or environmentally feasible and suggest that the proposed study focus on these two fundamental questions." Electricity costs alone have been estimated to be $165 million annually. Matt Sura, director of the Western Colorado Congress said, "Isn't this the fatal flaw of the project? Why is a study even required?"

Water quality was one of the biggest issues raised by the public. Al Pfister of the U.S. Fish and Wildlife Service mentioned that selenium in the Colorado River at the Utah border "exceeds the current state standard 85 percent of the time. Poor water quality could affect numerous fish and wildlife species in the rivers and streams where the water is delivered."

The boosters refuse to look at conservation policies that would increase water yields by reducing consumption. Representing agriculture, Harry Talbott recommended a way to increase water yields by removing "guzzling plants, such as Tamarisk." Nic Korte of the Grand Valley Audubon Society noted that, "drip irrigation for agriculture can reduce water use by 30 -70 percent and increase crop yields 20-90 percent."
