

LR Letter 01/31/12

Scoping Comments: LTEMP EIS on operations of Glen Canyon Dam

[Click here](#) to read the comments by Living Rivers, Colorado Riverkeeper, Center for Biological Diversity and River Runners for Wilderness.

The letter is 25 pages.

We have offered two alternatives:

- 1: Mimic the natural hydrograph and other natural processes.
- 2: Dam removal and a management plan based on the precautionary principle.

There are seven tables:

Table No. 1: Two alternatives in brief for consideration of the LTEMP EIS

Table No. 2: Academic reviews of GCD AMP

Table No. 3: Key public interventions on management of Glen Canyon Dam, Glen Canyon National Recreation Area and Grand Canyon National Park.

Table No. 4: References of Table No. 3

Table No. 5: Administrative History of NEPA (1970) compliance below the forebay of Glen Canyon Dam.

Table No. 6: References for Table No. 5.

Table No. 7: Administrative history of Glen Canyon Dam and its features.

CONCLUSION

After four decades of Interior's attempts to address the declining habitat conditions in Grand Canyon National Park's river corridor resulting from Glen Canyon Dam operations, it's critical now to treat this EIS opportunity as the major step forward in what must be a remedy to the ongoing failure of Interior's past ambivalence.

The management process is faulty from both the bottom-up and the top-down. From the bottom lies an AMP process that is guided by the whims of special interest, while the resource itself continues to suffer. From the top there is no clear mandate of what the real objectives are or should be, especially over the medium- and long-term. The ecosystem in Grand Canyon National Park is not WAPA's, trout fishermen's or river runner's playground to do with as they please. Nor is it Glen Canyon Monitoring and Research Center's scientific playground to tinker with trivial actions from a body dominated by these special interests. This is a world renowned riverine resource for which Interior, guided by the most rigorous interpretation of the spirit of those acts governing the National Park System, must step forward and act in the public's interest. If these special interest groups become frustrated with Interior's actions, they can

challenge them in the courts and the court of public opinion. There is no substitute for Grand Canyon, and it should be managed in accordance with that principle, now and in the future.

As such, there must be new leadership, and new avenues for administering the will and mandate of this leadership. The GCD AMP has and will continue to be a failure, so the EIS must address how this will be remedied.

Unfortunately, the complexity of water issues in the basin have effectively taken the common citizen out of the process. The issues, policy, laws and science have become too burdensome, too one-sided, and has created a situation of bewilderment or malaise. It has been suggested by many authors and oversight agencies that an independent commission for the Colorado River basin should be established. These issues have arrived to a point in history where it is quite possible that Interior is not the best choice in providing a long-term management proposal for the Colorado River basin, as evidenced by decades of time under its watch having failed to provide the leadership necessary to provide effective change toward greater sustainability on several fronts.

The EIS should therefore evaluate the constraints impairing Interior's ability to address the complex challenges facing the Grand Canyon River ecosystem and Colorado River management as a whole. A key component of any alternative must therefore be mechanisms to give all the funding and authority to an independent commission that can provide basin-wide and comprehensive analysis of what must be accomplished and in a reasonable time-frame for the benefit of Grand Canyon and the basin as a whole.

The EIS must also address Glen Canyon Dam's operations and impacts, in the full spectrum of its lifespan. All reasonably supported hydrologic and catastrophic scenarios over a century time-window must be explored in conjunction with evaluating alternatives. If climate change has taught us anything, it's that such long-range planning is critical now, something that Reclamation has been slow to recognize. If Glen Canyon Dam fails in a flood, or fails to provide water during a severe and sustained drought, then everybody will lose and this EIS will have been nothing more than stepping stone in that process.

Alternatives must also address specific strategies for habitat restoration in Grand Canyon's river corridor including: natural flow regime with associated temperature changes and sediment transport along with non-native species eradication. Most of these issues and the recommendations surrounding them have been on the table for decades, but it's time they are fully explored consistent with the present and long-term needs of a healthy, natural, Grand Canyon river ecosystem. And in exploring alternatives that can deliver these alternatives, a decommissioned Glen Canyon Dam must be included. As the past decade of inflows has illustrated, the likelihood of a naturally drained reservoir is no longer something water and energy planners can ignore, especially in light of the long-term environmental damage Glen Canyon Dam continues to impose.

Most importantly, it's time for Interior to have some real vision for what can be and should be done when it comes to water management through Grand Canyon. Interior

must once and for all abandon its policy of tinkering with knobs and switches and then defend these actions in court explaining how the public should not expect them to achieve a better result.

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