



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

MEMORANDUM

To: Brent Esplin, Regional Director
Upper Colorado Basin - Interior Region 7, Bureau of Reclamation

From: Dr. Timothy R. Petty
Chair, Glen Canyon Leadership Team
Assistant Secretary for Water & Science *Timothy R. Petty*
(APRIL 24, 2020)

Subject: Approval of Recommendation for Macroinvertebrate Production Flow Releases at Glen Canyon Dam, May 1 through August 31, 2020

On April 20, 2020, the Glen Canyon Planning/Implementation Team (Team) recommended conducting Experimental Macroinvertebrate Production Flow releases (Bug Flows) at Glen Canyon Dam from May 1 through August 31, 2020 (Attachment - *Final Recommendation to Implement Macroinvertebrate Production Flow Releases at Glen Canyon Dam May – August 2020*). The recommendation was developed to implement the provisions of the 2016 *Record of Decision for the Glen Canyon Dam Long Term Experimental and Management Plan Final Environmental Impact Statement* (LTEMP ROD) concerning annual planning for flow-based experiments.

The LTEMP ROD specifies the representation requirements for planning experiments at Glen Canyon Dam and is based on past successful planning and implementation of flow-based experiments. The Team includes technical representatives from the Bureau of Reclamation (Reclamation), the National Park Service (NPS), the U.S. Fish and Wildlife Service (FWS), the Bureau of Indian Affairs (BIA), the U.S. Geological Survey's (USGS) Grand Canyon Monitoring and Research Center (GCMRC), Western Area Power Administration (WAPA), the Arizona Game and Fish Department (AZGFD), the seven Colorado River Basin States (States), and the Upper Colorado River Commission (UCRC). The Glen Canyon Leadership Team (Leadership Team) is made up of decision makers from these same agencies.

The LTEMP ROD specifies that Reclamation will notify Traditionally Associated Tribes (Tribes) at least 30 days in advance of planned experimental flows. On March 31, 2020, notification of the possible Bug Flow experiment and offer for consultation was emailed to the Tribes and parties to the LTEMP National Historic Preservation Act Section 106 Programmatic Agreement. It is my understanding that, to date, no input from the Tribes or requests for consultation have been received by Reclamation.

The evolving COVID-19 Pandemic and response may affect GCMRC's ability to monitor the experiment. The Team has outlined potential impacts and continues to evaluate monitoring contingencies for the duration of the experiment. Let me be clear, the safety of our Federal employees remains the Department's top priority. I expect that any decisions regarding field work, including monitoring, will be carefully considered in the context of the most current guidance from the Secretary

of the Interior, the U.S. Office of Personnel Management, the Office of Management and Budget, the Centers for Disease Control and Prevention, and relevant State and local authorities.

The Leadership Team has also reviewed and considered the Team's recommendation, including the assessment of key resources that may be impacted or affected by Bug Flows and the experiment monitoring plan. The Leadership Team met via webinar on April 22, 2020 and members voiced their support for proceeding with the recommended Bug Flow experiment. Based on support from the Leadership Team and on the Planning/Implementation Team recommendation, I have decided to approve the recommendation to conduct a Bug Flow experiment starting on May 1 and running through August 31, 2020.

This Bug Flow experiment will be the fourth experiment conducted under the 2016 LTEMP ROD and demonstrates the utility of the LTEMP in allowing for experiments when conditions warrant and there would not be unacceptable adverse impacts to key resources. The approved Bug Flows will consist of steady weekend releases from Glen Canyon Dam that provide favorable conditions for insects to lay eggs along the Colorado River margins, and slightly higher fluctuating releases during the weekdays designed to prevent the eggs from drying out. This experiment is expected to have positive benefits to the food base of the aquatic and terrestrial ecosystems downstream of Glen Canyon Dam. The recommended Bug Flow experiment will provide resource benefits in the near term and will also provide important scientific information to be used in future decision making. The Bug Flow experiment is consistent with applicable laws concerning the operation of Glen Canyon Dam and will satisfy the Department of the Interior's (Department) goal to ensure effective and coordinated implementation of important research that the Department is undertaking as part of the Glen Canyon Dam Adaptive Management Program.

This is the third full year of implementing the process for annual experimental planning under the LTEMP ROD, which requires the Department to "schedule implementation / planning meetings or calls with Interior bureaus (USGS, NPS, FWS, BIA, and Reclamation), WAPA, AZGFD, and one liaison from each Basin State and from the UCRC, as needed or requested by the participants." At the conclusion of the experiment, the Team will review the planning process, implementation, and monitoring activities and develop a list of "lessons learned" to inform potential future experiments and experimental planning. In accordance with the LTEMP, the Department may make the decision to conduct future flow-based experiments (e.g., High Flow Experiments, Bug Flows, Trout Management Flows, and Low Summer Flows) at Glen Canyon Dam if it is determined that there are no unacceptable adverse impacts on other resource conditions. For future experimental planning, the Department welcomes input from you and other Leadership Team members as to whether this or another process should be used to satisfy the coordination and communication process of the LTEMP ROD.

I would like to personally thank both the Leadership and the Planning/Implementation Teams for their dedication and continued work that has resulted in this recommendation. The individual efforts of the team members is greatly appreciated. The coordination among the team members has been instrumental in making this process a success and has allowed the Department to continue its commitment to protect and improve the irreplaceable resources at and below Glen Canyon Dam.

Attachment - Final Recommendation to Implement Macroinvertebrate Production Flow (Bug Flows) Releases at Glen Canyon Dam May – August 2020