



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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December 5, 2014

Glen Knowles
Bureau of Reclamation
Upper Colorado Region, Attention: UC-731
125 South State Street
Salt Lake City, UT 84138-1147

Rob Billerbeck
National Park Service
12795 W. Alameda Pkwy
Lakewood, CO 80228

Re: Lees Ferry Fishery Management Plan and Trout Management Flows

Dear Mr. Knowles and Mr. Billerbeck:

The Arizona Game and Fish Department (Department) has been involved in management of all aquatic resources in Glen and Grand canyons since our inception. The Lees Ferry fishery is one of the most important economic drivers to an economically depressed region of Arizona and Utah. Recent studies indicate the value of this fishery creates an economic impact to Arizona of close to 17 million dollars and creates more than 200 jobs annually. The loss of this world class fishery, even for a short period, would be an unacceptable impact to a valued resource. As such, the Department is currently working with our constituency and partners in the development of a fisheries-based management plan for the Lees Ferry and Marble Canyon sections of the Colorado River. The goal of this plan is focused on preserving the Blue Ribbon trout fishery in the Lees Ferry section by working towards the following set of objectives:

1. Angler catch rates are ≥ 10 Rainbow Trout per day ≥ 14 inches, with at least one ≥ 20 inches;
2. Angler catch rates are ≥ 1.0 Rainbow Trout per hour;
3. Recruitment is $\geq 20\%$ but no more than 50% in a given year;
4. Maintain trout condition factor over 1.0 during the summer;
5. Maintain suitable habitat and water quality for Rainbow Trout;
6. Increase diversity and quantity of the food base for trout;
7. Rapid response to a catastrophic event.

The plan is intended to be prescriptive in nature. To meet each of these goals the group will be developing a set of conditions that must exist before implementing specific strategic management approaches. For example, the Department recently analyzed data from our Lees Ferry standardized

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electrofishing dataset that dates back to 1991. Our data confirms recent reports from fishing guides and anglers of the rapid deterioration of the condition and health of Rainbow Trout in the Lees Ferry reach of the Colorado River. The overall condition of the Rainbow Trout is the worst the Department has documented in 24 years of data collection. Analysis of Department survey data confirms that the population has collapsed. This collapse has resulted in a 55 percent reduction in the average catch per unit effort from 2012 and is currently below the 24 year average. Based on the poor condition and reduction in the trout population, the Department is opposed to conducting any form of a Trout Management Flow in 2015 that could further jeopardize the fishery. We believe that the poor condition and collapse of the trout population is due to high fall temperatures, low dissolved oxygen, an unbalanced population, and an insufficient food base.

The management plan, currently under development, identifies the following conditions that must be met before a Trout Management Flow would be supported by the Department: 1) average standardized electrofishing catch rate for Rainbow Trout is greater than 3.0 fish per minute; 2) The proportion of young of year Rainbow Trout (<152mm) exceeds 50% of the total population; and 3) summer the condition factor of 200mm-305mm is greater than 1.0. If all of these variables align, as they did from 2008 to 2011, then the Department would formally support the concept of Trout Management Flows to assist in managing toward our goal of a Blue Ribbon Rainbow Trout fishery.

Recognizing that any future modification of Glen Canyon Dam operation will likely result in triggering specific strategic management approaches, we hope our partners in the LTEMP process can use this as a compass in developing recommendations for the required Fish and Wildlife Coordination Act Report that will follow the selection of the preferred alternative. There is broad interest in the Lees Ferry fishery and it is of paramount importance that as the LTEMP process continues, the recommendations and implementation for dam operations maintain or enhance the trout populations rather than adversely impact them. With this in mind, the Department would be pleased to have both the Bureau of Reclamation and the National Park Service partner with us as we continue this management planning process.

Thank you in advance for your leadership and support on these efforts.

Sincerely,



Jim deVos
Assistant Director, Wildlife Management Division

JDV:cc

cc: AMWG MEMBERS