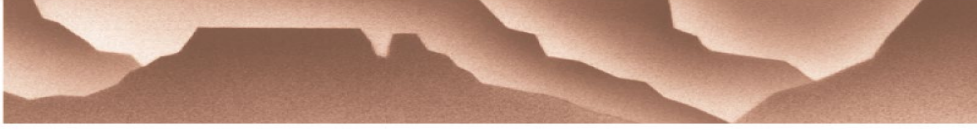


GRAND CANYON TRUST



October 9, 2007

Secretary Dirk Kempthorne
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

RE: MINORITY REPORT – TWG motion regarding a 2008 experimental BHBF

Dear Secretary Kempthorne:

As members of the Glen Canyon Dam Adaptive Management Program (AMP), we are writing to recommend that a Beach-Habitat Building Flow (BHBF) occur in 2008. At this time, there is a large amount of sediment in the mainstem. We believe the responsible action is to take advantage of this opportunity to test hypotheses on how best to meet the intent of the Grand Canyon Protection Act (GCPA).

Although it is unusual to present a minority report to you based on a motion from the Technical Work Group (TWG), it is necessary in this instance for us to fulfill our advisory responsibility under the AMP Charter. If we were to follow the usual process, there would not be sufficient time for completing compliance activities and logistics planning. The next Adaptive Management Work Group (AMWG) meeting has not even been scheduled, and a decision to proceed is needed by early November.

Under Record of Decision (ROD) operations at Glen Canyon Dam, sediment is being eroded in Grand Canyon faster than it is replenished. Thus, ROD operations are violating the GCPA's mandate that, "The Secretary shall operate Glen Canyon Dam in accordance with the additional criteria and operating plans specified in section 1804 and exercise other authorities under existing law in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use."

Meeting the intent of the GCPA requires maintaining sediment in the canyon. The only solution to rebuilding beaches and reversing the negative mass balance of sediment in Grand Canyon is to periodically implement BHBFs under enriched sediment conditions. A positive mass balance of sediment is also needed to meet the intent of the Act for many other park resources and values including native fish, cultural resources and recreational resources. Experimental BHBFs are

needed to determine the frequency of BHBFs required under different sediment conditions to meet the intent of the Act. The current sediment conditions would provide a tremendous learning opportunity for how best to meet the intent of the GCPA.

Sufficiently high sediment conditions existed in fall 2006 for the Grand Canyon Monitoring and Research Center (GCMRC) to recommend a BHBF in 2007. In response, the TWG passed the following motion in November 2006, "The TWG recommends to the AMWG that the Secretary of the Interior implement a BHBF in the timeframe from mid-January 2007 to March 2007 in accordance with a science plan that was developed by GCMRC, approved by the TWG, and funded from the experimental fund." Unfortunately, the AMWG declined to adopt the TWG recommendation and instead asserted the need for an "off-the-shelf" science plan before any additional BHBFs can go forward. The AMWG recommended that you, "...charge GCMRC to develop a science plan for a BHBF that addresses the concerns raised at the AMWG meeting on Dec. 6, 2006, and AMWG further charges the TWG to work with GCMRC to review the draft Science Plan and make a recommendation to the AMWG."

Today, sediment conditions are even higher than those present in the fall of 2006. GCMRC has presented a draft Science Plan to the TWG, and two TWG ad hoc groups, as well as the Science Advisors, have reviewed the plan and found it to be technically sufficient. In response, the Grand Canyon Trust presented a draft motion for a 2008 BHBF (attached) for consideration by the TWG at their October 2-3 meeting. Unfortunately, the TWG failed to recommend a BHBF in 2008.

We believe it is critical that a BHBF (as described in the attached proposed motion) is conducted in 2008 to meet the intent of the Grand Canyon Protection Act. We look forward to your action.

Sincerely,

Rick Johnson
Technical Work Group representative
Grand Canyon Trust

Nikolai Ramsey
Adaptive Management Work Group representative
Grand Canyon Trust

CC: Ms. Brenda Burman, AMWG, TWG

Motion presented 3 October 2007 at the Technical Work Group meeting

The TWG recommends to the AMWG that an experimental BHBF take place in 2008 as follows:

- a. The hydrograph should resemble the November 2004 hydrograph.
- b. The BHBF will be implemented in late March or early April.
- c. A science plan specific to a spring 2008 BHBF will be provided for TWG review by mid-January 2008.

At a minimum, the BHBF experiment should address the following general questions:

- a. To what extent can BHBFs be used to rebuild and maintain sandbar habitats?
- b. Do sandbars deposited by BHBFs contribute to the preservation of archaeological sites?
- c. Do nearshore habitats created by BHBFs (under enriched sediment conditions) benefit humpback chub and other native fishes?

Additional priority questions include those that would benefit the selection of the most beneficial alternative in the LTEP.

A science symposium to synthesize information derived from BHBFs and HMFs will be slated for WY 2009.

Recommend that AMWG convene a conference call in early November.