ANGLER & SPORTSMAN ACTION ALERT

The National Park Service is conducting an Expanded Non Native Aquatic Species Management Plan Environmental Assessment (EA) that includes **electrofishing mechanical removal of brown trout** in Lees Ferry/Glen Canyon. An action that will have **a damaging impact on the Lees Ferry trout fishery** and the business and guide services dependent on that fishery. **Submitting your comments is the only way to protect and support the fishery.**

By submitting **your comments in opposition to mechanical removal of brown trout** in Lees Ferry/Glen Canyon you **will affirm angler and sportsman support, demonstrate the importance of the Lees Ferry/Marble Canyon trout fishery, and provide direction to the Park Service for acceptable alternatives in the EA.**

Submit personal scoping comments by copying and pasting this browser link:

https://parkplanning.nps.gov/commentForm.cfm?documentID=84099

Commenting using the email form is easy and fast. Your personal view is what's important, particularly what having angling opportunities available means to you and what the Lees Ferry trout fishery represents to you. Use or don't use the reasons below, whatever is consistent with your view. Comments are more effective written in your own words rather than cut and paste. There will be organizational comments submitted but individual comments are equally as important in putting the Park Service on notice to not unnecessarily jeopardize the Lees Ferry trout fishery. Comment cutoff date is midnight January 5, 2018.

Here are the details: The Park Service is proposing a wide range of actions, **including electrofishing mechanical removal of brown trout,** for controlling or eradicating non native species that may pose a threat to native aquatic species. With the exception of mechanical removal of brown trout in Lees Ferry/Glen Canyon the other proposed actions would not impact the trout fishery.

The EA proposes electrofishing mechanical removal in Lees Ferry/ Glen Canyon with "**long-term, intensive and repeated electrofishing** ". Collateral damage to the rainbow trout fishery from mechanical removal on the proposed massive scale will be unavoidable. Rainbow trout not removed at the time of brown trout removal will be intensely and repeatedly shocked as the electrofishing process progresses along the river and continues over recurring lengthy periods of time measured in weeks. Surviving rainbow trout, while recovering, would be unfishable for extended periods. **This action would have a catastrophic impact on the quality of the Lee Ferry trout fishery, the welfare of the local community, and the regional economic benefits tied to the fishery.** We strong oppose this action for the following reasons:

(a) We are unaware of any scientific data which indicates that electrofishing mechanical removal will be an effective tool for controlling brown trout in the main stem of the Colorado River. In fact, intense, repeated and long term main stem electrofishing throughout the upper Colorado River

Basin has been largely ineffective at managing or controlling nonnative fish. The proposed removal action as a means to control brown trout on the scale and in a setting like Glen Canyon has little to no prospect of attaining the EA's purpose and need objective.

(b) Many more rainbow trout would be shocked for each brown trout captured. Brown trout are presently two to three percent of the Lees Ferry trout population. The focus of mechanical removal would be on shoreline areas that are also prime fishing areas. In addition to direct rainbow trout mortality, there is ample scientific literature showing that electrofishng salmonids affects their behavior, which would impact angler catch rates and satisfaction.

(c) The collateral damage to the Lees Ferry rainbow trout fishery from mechanical removal and the public perception it creates will decimate an already distressed economic community that has been impacted by dam operations. In addition, National Park Service and Bureau of Reclamation opposition to actions benefiting the trout fishery has resulted in ongoing damage to visitor use and experience and has had a deleterious socioeconomic and environmental social justice effect on the local community.

(d) Native American Tribes have long objected to mechanical removal efforts below Glen Canyon Dam as an affront to their religious and spiritual beliefs. As such we believe it is unacceptable for the National Park Service to propose mechanical removal as a strategy for managing brown trout in Lees Ferry/Glen Canyon.

(e) The cost for implementing long term intensive and repeated electrofishing would be very high and put a major drain on Department of Interior Agencies budgets which could be used to address other priorities.

(f) The EA ignores possible or potential causes for the recent increase in brown trout i.e. sequential fall High Flow Events, warmer water temperature, and the fall High Flow Event related aquatic food base shift, etc. The EA scoping alternatives propose perpetual treatment with no cure for the cause(s). The Bureau of Reclamation has authority over dam operations but isn't included in the EA and therefore potential flow related causes and related corrective actions are not available.

(g) The most recent fish population sampling results, showing a potential halt or change in the direction of brown trout numbers, are ignored in the reasons for the need of the EA.

(h) Sixty miles of the Colorado River in Marble Canyon separate Lees Ferry from the concentration of native fish at the Little Colorado River. Marble Canyon is ignored in the EA and no actions are proposed to address present or future immediate threats to native fish in Marble Canyon or at the Little Colorado River,

(i) The Park Service asserts authority and control over the Colorado River fishery by subordinating the Arizona Game and Fish Department to a cooperating agency role rather than a coequal decisional authority,

The Park Service Scoping Notice containing additional detail is available at:
https://parkplanning.nps.gov/document.cfm?parkID=62&projectID=74515&documentID=84099