OPERATION OF GLEN CANYON DAM
DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC COMMENTS ANALYSIS REPORT

AUGUST 1994

PREPARED BY BEAR WEST CONSULTING TEAM FOR THE

COLORADO RIVER STUDIES OFFICE

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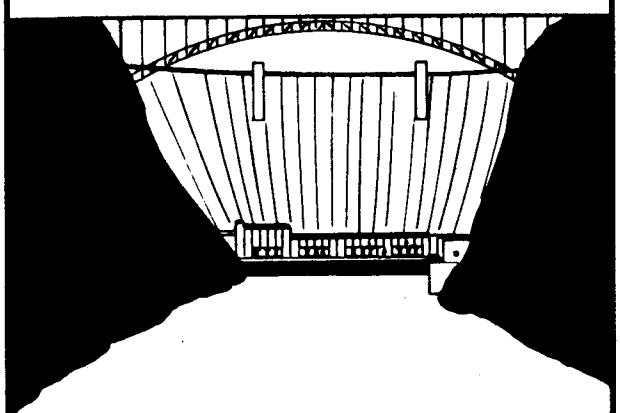

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LIST OF ACRONYMS AND ABBREVIATIONS

AMP	Adaptive Management Program
CFR	Code of Federal Regulations
cfs	cubic feet per second
CRSPA	Colorado River Storage Project Act
DEIS	Draft Environmental Impact Statement
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMVSFA	Existing Monthly Volume Steady Flow Alternative
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FONSI	Finding of No Significant Impact
FWCA	Fish and Wildlife Coordination Act
FWS	U.S. Fish and Wildlife Service
GCD	Glen Canyon Dam
GCD EIS	Operation of the Glen Canyon Dam Environmental Impact Statement
GCES	Glen Canyon Environmental Studies
GCPA	Grand Canyon Protection Act
GCNP	Grand Canyon National Park
GCNRA	Glen Canyon National Recreation Area
HFFA	High Fluctuating Flow Alternative
ISRP	Independent Scientific Review Panel
ILFFA	Interim Low Fluctuating Flow Alternative
IOC	Interim Operating Criteria
kW	Kilowatt
kWh	Kilowatt-hour
maf	Million acre-feet
MFFA	Moderate Fluctuating Flow Alternative
MLFFA	Modified Low Fluctuating Flow Alternative
MPCA	Maximum Powerplant Capacity Alternative
MW	Megawatt
NAA	No Action Alternative
NBS	National Biological Survey
NEPA	National Environmental Policy Act
NHWZ	New High Water Zone
NO_x	Nitrogen oxides
NPS	National Park Service
OHWZ	Old High Water Zone
PCS	Public Comment Summary
P.L.	Public Law
Reclamation	Bureau of Reclamation
ROD	Record of Decision
RPA	Reasonable and Prudent Alternative
SASFA	Seasonally Adjusted Steady Flow Alternative
SO_2	Sulfur dioxide
USC	United States Code
USGS	U.S. Geological Survey
Western	Western Area Power Administration
YRSFA	Year-Round Steady Flow Alternative

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BUREAU OF RECLAMATION
OCTOBER 1994

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FOREWORD

This report summarizes the public comments on the Draft Environmental Impact Statement (DEIS) for the Operations of the Glen Canyon Dam (GCD). It serves as a detailed content analysis of the oral and written comments received during the comment period, January 4 to April 11, 1994.

The Bureau of Reclamation (Reclamation) has utilized the services of the Bear West Consulting Team to assist in summarization of the comments. The Bear West Consulting Team has reviewed, analyzed, and summarized the more than 33,000 comments received during the DEIS comment period. The consultants have taken great care to establish a fair and accurate representation of the comments received. Please note, however, that whenever persons summarize and organize comments for purposes of review and response, the possibility exists that different persons will categorize or summarize comments differently. To facilitate easy understanding of comments, this report arranges its discussion according to the organization of the DEIS, and provides additional breakdown of comments according to National Environmental Policy Act (NEPA) standards and processes. Many comments have been read by multiple reviewers to ascertain the best way to summarize comments in an accurate manner. For clarity, the term "commentors" has been coined to refer to those who submitted written and oral comments during this process.

Comment summarization is but one helpful way to gain an understanding of public comment. The issues associated with the Operation of Glen Canyon Dam EIS (GCD EIS) have stirred substantial emotion from a variety of perspectives. Comment reviewers and decisionmakers attended public hearings and read a cross-section of individual comments. This has helped them to understand the emotions associated with issues surrounding this EIS that can only be gleaned from direct contact with the public and review of the comments submitted.

This Summary of Public Comments for the Operation of Glen Canyon Dam DEIS builds on work performed during scoping and resulting from the *Final Analysis Report on Scoping Comments, Glen Canyon Dam Environmental Impact Statement* and the *Glen Canyon Dam EIS Preliminary Alternatives Report.* Like prior comment summary reports, this report organizes and summarizes comments to assist those tasked with responding to public comments.

This Summary is divided into four chapters covering the following topics:

- Description of the DEIS public comment process;
- The content of public comments on the DEIS;
- Summary of the public comments;
- Statistical analysis of the public comments; and some conclusions by the consultants after reviewing the comments.

A computer program has been used to provide an objective analysis of certain features of the comments and to facilitate tracking, corrections, re-organization, and analysis of comments.

Appendices include a detailed summary of public comments, information on the Operation of Glen Canyon Dam EIS process materials, including Federal Register and other notices, graphic illustrations of statistical data, and information available to the public.

Comment summaries, with numbers of comments on each topic, appear in Appendix 1 at the end of this document.

CHAPTER ONE
Description of the DEIS Public Comment Process

The Operation of Glen Canyon Dam Draft Environmental Impact Statement (DEIS) public review process was designed to build on the substantial public involvement established throughout the Environmental Impact Statement (EIS) process. Given the level of public interest during scoping—with receipt of more than 17,000 comments and subsequent open cooperating agencies meetings as well as public review of preliminary alternatives for the DEIS—Reclamation provided for hearings in seven cities across the United States and a 97-day written comment period. Reclamation's Colorado River Studies Office has also distributed a periodic newsletter to inform interested parties of recent developments in the NEPA process. The more than 33,000 comments received reflect the intense public interest in the DEIS and the success by Reclamation in making interested persons aware of the process and the opportunities for public comment.

1. Operation of Glen Canyon Dam DEIS Process and Meetings

For the DEIS, the focus of Reclamation's effort was to elicit comments on the alternatives and analyses presented in the DEIS. With the issuance of the DEIS in early January 1994, briefing and public information sessions were held in four cities to provide information and answer questions regarding the DEIS. After the public had an opportunity to digest the DEIS, Reclamation held hearings in the same seven cities as the scoping meetings to offer the public the opportunity to provide oral comments in a wide range of locations across the country, consistent with the interest expressed to date in the DEIS. The written comment period for the DEIS ended April 11, more than 2 weeks after the last public hearing.

2. Public Information Session Locations

In addition to briefings conducted on Capitol Hill in Washington, D.C., and Stouffer's Concourse Hotel in Arlington, Virginia on January 27, Reclamation held public information sessions at the following locations and dates:

Salt Lake City, Utah, February 11, 5-9 p.m., Airport Hilton, 5151 Wiley Post Way, Salt Lake City, UT 84116.

Phoenix, Arizona, February 16, 5-9 p.m., YWCA, 9440 No. 25 Avenue, Phoenix, AZ 91505.

Flagstaff, Arizona, February 17, 5-9 p.m., Little America, 2515 Butler Avenue, Flagstaff, AZ 86004.

At each public information session, Reclamation personnel made a formal presentation at 6:30 p.m., during which they described the process and comment information, showed a video on the DEIS, reviewed the DEIS contents, discussed the EIS process, and indicated that the public information sessions were intended to provide information and answer questions, but not to receive comments (which would be handled in the public hearings).

Before and after the formal presentation, EIS team members were available at 11 display stations (organized by resource) to answer questions and provide information to interested members of the public. At the Washington, D.C. meetings, however, briefings were substituted for the display stations. Each information session drew attendance of approximately 60 to 100 persons. The public appeared to be pleased with the format of the meetings, as well as the information and expertise available. Discussion was lively at many of the sessions.

3. Public Hearing Locations

Reclamation held public hearings at the following locations and dates, as announced in the Federal Register:

Los Angeles, California, March 7, 7:00 p.m., Burbank Airport Hilton Hotel, 2500 Hollywood Way, Burbank, CA 91505

San Francisco, California, March 9, 7:00 p.m., Fort Mason Conference Center, Room A-1, Golden Gate National Recreation Area, Marina Boulevard and Buchannan Street, San Francisco, CA 94123

Phoenix, Arizona, March 14, 7:00 p.m., YWCA, 9440 No. 25 Avenue, Phoenix, AZ 91505

Flagstaff, Arizona, March 15, 7:00 p.m., Little America, 2515 Butler Avenue, Flagstaff, AZ 86004

Salt Lake City, Utah, March 17, 7:00 p.m., Salt Lake Hilton, 150 West 500 South, Salt Lake City, UT 84101

Denver, Colorado, March 21, 7:00 p.m., Marriott Denver West, 1717 Denver West-Marriott Blvd, Golden, CO 80401

Washington, D.C., March 24, 2-4:30 p.m., Capitol Hill Dirksen SOB, Room 562, Washington, D.C.; 7 p.m. Stouffer Concourse (Crystal City) 2399 Jefferson Davis Hwy, Arlington, VA 22202

Reclamation established these locations and times, and hired a court recorder to record all comments verbatim. A Hearing Officer from the Department of the Interior's Solicitor's Office conducted the hearings, and was accompanied at the hearing table by two Reclamation officials. Other Reclamation employees and consultants from Bear West assisted with the meeting arrangements.

4. Advancing/Preparing For Public Meetings

For the meetings, Reclamation rented handicapped-accessible facilities capable of seating about 300 people. All meeting facilities were inspected in advance to assure that the rooms and facilities were adequate. Reclamation reviewed all aspects of meeting facility elements, including security, maintenance, emergency preparations, heating/cooling systems, visual /audio presentation capability, additional/expandable space, ease of access and exit, meeting registration logistics, and room acoustics and dynamics.

Reclamation established hearing ground rules, and provided them to all interested and participating parties prior to and at the beginning of each public hearing. These rules established the purpose of the hearing, the hearing order, how much time was allotted to each speaker or participant, as well as the order of speakers, expected common courtesies, and how and when additional written comments could be provided.

Hearing attendees completed registration that included name, address, affiliation, official position and whether elected, and whether or not the attendee wished to speak at the hearing. The registration cards bore numbers to determine order of speakers on a first-come, first-served basis. Speakers were allowed to sign up in advance by contacting Reclamation.

5. Conducting the Public Hearings

A head table seating three persons was located at the front of the hearing room. The Hearing Officer was seated at the head table with Reclamation officials. A court recorder sat at the side of the hearing room. Bear West and Reclamation representatives assisted in registration and room logistics, and were available to answer questions and otherwise provide assistance.

Each public hearing began with brief welcoming remarks. The Hearing Officer then:

- introduced the hearing table;
- noted Reclamation and Federal agency representatives;
- reinforced the continuing commitment to a fair, open process in the EIS;
- indicated careful consideration of all points of view in responding to comments on the DEIS;
- described Reclamation's role in the NEPA process, time frames for the Final Environmental Impact Statement (FEIS) development, and coordination with other Federal agencies; and
- indicated the written comment period.

During the public comment portion of the meeting, the Hearing Officer focused attention on the conduct of the meeting. The Hearing Officer described the recording, processing, and use of comments from the meeting, read the ground rules for meeting conduct, welcomed additional written comments, and called on speakers on a first-come, first-served basis as reflected on the pre-registration list and the registration cards. On-deck speakers were announced. Microphones with a podium facing the Hearing Officer were provided at the front of the room for persons presenting comments. The protocol for speakers was as follows: 1) U.S. Senators; 2) U.S. Representatives; 3) Indian Tribal Representatives; 4) Governors; 5) State Senators; 6) State Representatives; 7) Mayors; 8) City Council Members; 9) County Commissioners; 10) other elected and high-level appointed officials; and 11) pre-registered speakers, and 12) the public on first-come, first-served basis.

6. Hearing Transcripts and Report

A court recorder prepared transcripts of all public hearings. These transcripts and a summary of comments are available for review at the Colorado River Studies Office, Upper Colorado Region, Bureau of Reclamation, 125 South State Street, Salt Lake City, Utah 84111. The transcripts were used to analyze all public hearing comments and assign database identification numbers.

7. Written Comments on the Operation of Glen Canyon Dam DEIS

Reclamation received more than 33,000 comments on the DEIS. The written comment period ended on April 11, 1994, and comments received for more than a month after the close of the comment period were accepted to assure that all comments sent within a reasonable time of the close of the comment period would receive the benefit of review for the Final EIS and decisionmaker consideration.

Most of the remainder of this report is devoted to the summary of the comments prepared by the Bear West Consulting Team.

CHAPTER TWO
Content Analysis of Public Comments on the GCD DEIS (Development of the Public Comment Summary and Database)

In order to prepare a complete and accurate analysis of the public comment on the DEIS, Reclamation and the Bear West Consulting Team developed detailed procedures to identify, record, and carefully read and evaluate every individual comment. To facilitate this process, where the expectation was that many opinions and thoughts would be identical or similar, a process of "coding" comments was utilized.

A "code" is a sentence, paragraph, or group of words that succinctly expresses a belief, thought, opinion, concern, fact, or interest regarding the DEIS's proposals for regulating the flow of water below the GCD. The Public Comment Summary (PCS) resulting from the content analysis contains more than 2300 separate opinions or thoughts regarding the large number of issues involved in this complex system.

Each code (i.e., belief, thought, opinion, concern, fact, or interest) may be both distinct from and similar to other codes and comments. Many codes reflect expressions of belief or what the author considers to be facts. Others question and challenge the facts, beliefs, interests, and opinions of others presented in the DEIS or other statements concerning the issues addressed therein. In the content analysis, the objective is to accurately reflect the content of the comments without attempting judgement on accuracy, completeness, or relevancy. It is clear from reading the content analysis that some comments are very general and could apply to many different settings, while others are very specific and apply to very limited and often technical issues addressed by the DEIS.

Each comment has been assigned a position in the PCS to facilitate its comparison to the DEIS and to other comments. The assignments were made based on the primary topic addressed by the comment. In some cases, a comment might have covered more than one subject, such as those that dealt with the impact of a particular alternative on a specific resource or cumulative impacts to a resource. In these cases, resources took priority. Other statements about cumulative impacts are located in the "Content" subsection of "Document Adequacy." In other cases, the decision was based on whether the comment was a statement of opinion or belief or a statement or question of fact. The PCS is organized in an outline format and a table of contents to that format should facilitate the location of comments on a particular subject. The PCS and its table of contents are found in Appendix 1.

Each document received at Reclamation's Salt Lake City office was logged-in, assigned an identification number and the original was kept on file in the Reclamation offices. Reclamation personnel reviewed each document, and forwarded copies to the Bear West Team for content analysis. The coding process consisted of a number of distinct steps. First, the name and address of the commentor was recorded along with any identifying information regarding the affiliation claimed by the commentor. Each communication was assigned to a coder, who carefully analyzed the substance of each statement and assigned code numbers to every substantive aspect of a comment that was specific enough to be recorded separately. If the comment was identical to others analyzed in a previous document, the coder assigned the same number as had been used for that statement in the documents already coded. If the comment was different from any comment coded previously, a new code was added and assigned a number. This process allows the analysis to expand as the ideas or comments expand, and makes it easy to tabulate the number of times members of the public made particular comments. A one-page letter, for example, might

contain only one code, or as many as 20 distinct codes because of the number of issues addressed.

1. Types of Documents

Reclamation received several different types of documents, ranging from letters of a single sentence to letters of 10 to 12 pages. Reclamation also received a large number of pre-printed cards that had been distributed by organizations to their constituents, asking them to sign the cards and forward them to Reclamation. The full text of these cards appears in Appendix 5. Most of the cards arrived without any additional comment, with only the sender's name and address added to a card's pre-printed message. Three different pre-printed messages accounted for the vast majority of the card comments received. In some instances, however, commentors supplemented the pre-printed messages by writing personal comments on the card. These were counted as letters rather than as cards, and the personal comments were assigned their own code numbers and recorded to insure that the content analysis was complete. Many of the organizations with direct interests in the outcome of the EIS process wrote extensive reports—several ranging from 20 to more than 70 pages—with detailed suggestions for word changes, deletions, and additions to the DEIS, and questions concerning the technical detail contained in the DEIS. These complex and technical documents often required many numbered codes for a complete content analysis.

Reclamation also received numerous oral comments at the public hearings. These comments were carefully recorded, and the resulting transcripts were used to assign database identification numbers to the oral comments.

2. The Database

To manage and organize the numerous materials received, the Bear West Consulting Team entered all of the codes, which included document identification and names and addresses of commentors, into a computer database using Quattro Pro and Paradox software. This database contains identifying information on the 33,000 documents received and the 2300 separate codes that are required to analyze the content of these communications. Altogether, the codes were utilized in the coding process more than 130,000 times, and the comments contained an average of approximately 10 content codes per document.

Seventeen people worked on coding, data entry, and computer programming to build the database. This process has taken some 6 months since the comments started to arrive in significant numbers.

CHAPTER THREE
Summary of the Public Comments

This chapter organizes and summarizes the thousands of written and oral public comments submitted in response to the Operation of Glen Canyon Dam DEIS. It serves as a detailed content analysis of the comments to assist those tasked with responding public comments. Readers should note, however, that although accurately representative of the range of comments submitted, this summary is not a substitute for a full reading of the more extensive comment summaries found in the Public Comment Summary (Appendix 1) or for a reading of the comments themselves, which are located at Reclamation's Colorado River Studies Office in Salt Lake City, Utah. The reader should also note that whenever persons summarize and organize comments for purposes of review and response, it is possible that different persons will categorize or summarize comments differently. Nonetheless, the Bear West Consulting Team has taken great care to develop a fair, consistent, and accurate representation of the comments received.

1. General Comments About the Adequacy of the Process and the Document

These comments address the adequacy of the process and the DEIS. They cover a broad range of subjects relating to leadership, cooperation, scope and analysis, alternatives, and legal mandates that should influence the EIS. Reclamation also received comments relating to the Record of Decision (ROD). Comments range from praise of the process and expressions of appreciation for the performance of the cooperating agencies to expressions of suspicion and criticism of some agencies or of the entire process.

a. Process Adequacy

i. General, ii. Leadership, and iii. Cooperation

In their comments, members of the public single out several aspects of the process for expressions of agreement and appreciation, including: the efforts made to follow the NEPA process; the work of the cooperating agencies; the involvement of the Indian Tribes as equal partners; and the expressions of agreement with what had been done. Some groups express a desire to continue to cooperate to reach the ROD.

The criticisms range from expressions of disappointment to requests for major changes. For some, the preferred alternative was incorrectly specified since baseline flows that mimic pre-dam conditions were never implemented in ways that provide a basis for evaluating selective withdrawal or sediment augmentation, which could also mimic pre-dam conditions. Others complain that the dissent by the U.S. Fish and Wildlife Service (FWS) from the preferred alternative agreed to by all other cooperating agencies resulted in changes in the preferred alternative that were not fully discussed and endorsed by the cooperating agencies. Another criticism concerns the alleged lack of adequate consideration in the DEIS of the impact on the seven Colorado River Basin states. Consultation with governors of those states on these issues is required. Others request clarification of information presented on the cooperating Tribes and why the Havasupai declined to cooperate.

iv. Scope

The scope of the DEIS drew criticism for its alleged lack of consideration of the need for growth and for its analysis of the non-operational impacts on non-native species, temperature, sediment, and human use. Some believe that methods beyond flow regulation may be required to address environmental conditions below the dam, and that these options were not adequately considered in the DEIS. Some also advocate a shift in emphasis from regulation of flows to management of resources.

v. Analysis

Comments run the gamut from praise for the data and analysis to allegations that they are not consistent or adequate. Some commentors allege that hypotheses on damage are not related to dam operations, that measurements of ecological damage are not provided in comparable fashion with power losses, that dollar values are lacking in ecology issues, and that the costs and benefits for various resource uses should be based on a "willingness to pay" concept. According to some, the financial and economic analyses are neither balanced nor complete and do not take into account the various subsidies provided for different resource users. The geographical boundaries of impact analyses are challenged as is the attrition and loss of biological resources. Other possible weaknesses identified are: (1) costs of enhancing downstream environment should be made more explicit; (2) user-day concepts applied to recreational use should also be applied to power users; (3) losses to power users are neither adequately delineated nor comparable to values for recreational use and environmental preservation.

vi. Alternatives

Comments reveal disagreement about how the alternatives considered would produce different effects on the environment. The impacts for the research flows of the preferred alternative, they suggest, are not adequately considered and the consequences are largely unknown. Some commentors believe the preferred alternative should be based on science, and tradeoffs should not be made until identifiable benefits outweigh negative impacts. In addition, comments assert that if wilderness is the desired goal, then fluctuating flows are less reflective of these conditions than the Seasonally Adjusted Steady Flow Alternative (SASFA).

Most commentors in this section request that the public be fully informed and have an opportunity to comment on every aspect of the EIS as it is developed. Opinions vary on the extent to which the public has been fully informed and given adequate opportunity to comment. Some request another opportunity to review and comment before the FEIS is issued.

viii. Legal Mandates That Influence the FEIS and ROD

There are clear differences of opinion on the requirements of NEPA, especially as it relates to the no-action alternative and the required economic analysis. Likewise, opinions differ on the requirements imposed by the Grand Canyon Protection Act (GCPA) and the directives it imposes on a variety of issues, including replacement power feasibility and environmental impact mitigation for cultural resources and visitor use. Some feel that the "Law of the River" (including the Winters doctrine) and the Clean Water, Endangered Species, and Energy Policy Acts all impose requirements that have not been adequately addressed in the DEIS.

b. Document Adequacy

i. Tone

Commentors here request a document written for a lay public or, alternatively, a much greater degree of technical documentation of the science involved, or both. Some allege that the document is full of subliminal bias and an overemphasis upon the negative aspects of some alternatives without adequate emphasis upon benefits. Many consider the tone of the report to be too pessimistic.

ii. Content

While members of the public generally agree on the need to rely on facts and science and to cover all the issues, that is where agreement generally ends. The disagreements relate to avoidable versus unavoidable impacts, which impacts are adverse and which are not. Commentors also disagree about the description of hydrological patterns before and after dam construction and the extent to which hydrological patterns provide cues, predictable or unpredictable, for native fish spawning. Some suggest improving the public understanding by reformatting and color coding tables and graphs and by expanding the glossary with further discussion of technical and subjective terms.

They also disagree over how different flows such as the SASFA should be adjusted seasonally.

iii. Format and Layout and iv. Other

Commentors also address the executive summary and the format and layout of title pages and sections of the report, and give suggestions for the FEIS. Many are impressed with the format of the document, and suggest only minor changes. Others are less satisfied, and offer more substantial criticism. There are suggestions that some important points be highlighted near the beginning of the report, rather than relegated to presentation later in the report. These suggestions covered such issues as selective withdrawal benefits, destabilized waters, impacts on humpback chub, razorback sucker, and flannelmouth sucker. Some suggest that the entire EIS be written in scientific/hypothesis form so that decisionmaker(s) will not reach erroneous conclusions. Commentors also request better U.S. Code notation, better maps of Indian Tribal boundaries, tributary locations, and consistent treatment of permit requirements and assurances, especially by Indian Tribes. One also suggests that each item in the bibliography be available for public use at some central location.

2. Comments Specific to the Alternatives Outlined in the DEIS

a. Comments on the Group/Range of Alternatives in the DEIS

A few of the comments suggest that the range of alternatives is too narrow. Another set of comments suggests that contrary to both the letter and spirit of the law, the dam has been operated primarily for power generation, and all alternatives in the EIS keep power generation as paramount. A new alternative is suggested called the "Equitable Fluctuating Flow" to provide power while reducing peak flows by 25%. Some feel the operational and non-operational options should be integrated to achieve management goals of individual resource optimization. Non-operational mitigation was suggested where operational mitigation would either be ineffective or less cost-effective after considering costs to all resources. Some suggest that the analysis comparing alternatives is misleading and that it is disturbing that alternatives are evaluated for effects on power operations and marketing.

b. General Comments Concerning Dam Operation Providing Background Information for Discussion of Alternatives.

i. Purpose of the Dam

According to a few comments, it is necessary to indicate the need to balance electricity, water, ecology, and all resources while sustaining Grand Canyon. Others state that Reclamation and cooperating agencies are to be commended for selecting a preferred alternative that balances competing needs. For some comments, the goals of the dam remain intact—i.e., to regulate flows and provide for water storage, flood control, and power generation— and in accomplishing these goals, operations have improved vegetation and wildlife but decreased usable beaches. Some feel that attempts by FWS to impose critical habitat and endangered species criteria on studies that are already concluded is like changing rules to get what you want.

ii. Dam Operation

Those who submitted comments on dam operation offer a wide variety of suggestions, from some who favor maintaining the practices of the past 30 years to others who advocate making whatever changes are required to preserve ecology and resources below the dam. Some commentors focus their suggestions on changes that are occasioned by the existence of the dam, while others are more concerned about changes due to fluctuating flows from the dam. Some wonder what the scientific evidence shows regarding how dam operations affect the resources below the dam; still others ask what resource mitigation issues will result from changes in power generation and flows from the dam. The issues raised include: differences in day and night time fluctuations; practices that may or may not change water temperature

below the dam; actual fluctuations in daily flows pre- and post-dam; the extent to which Reclamation should feel constrained by the requirement of 8.23 million acre-feet (maf) releases with suggestions that lower releases could be justified; and agreement that fluctuating flows have caused environmental damage, but disagreement on how much the flows must be modified to reduce or eliminate such damage. The range of comments indicates a clear lack of agreement on what the scientific evidence reveals about dam operations and on the impact that changes in dam operations will have on the ecology below the dam. The comments reflect general agreement that the lack of sediment in the water released from the dam and the colder water temperatures result from the existence of the dam more than from its operation. While some advocate more moderate ramping rates in any fluctuating flow scenario, many disagree on how much impact this action will have.

Some members of the public believe that the models used to describe impacts are overstated because they incorporate potential releases rather than actual releases, which results in a tendency to overstate power-related influences. The comments contain requests for clear and convincing scientific evidence before changes in dam operations are implemented. Some suggest that the evidence is not clear thus far. Several comments share a common theme that science should guide decisions on dam operations.

iii. Legal Issues Affecting Dam Operation and the Alternatives

Several commentors urge that dam operations comply with the GCPA. Some of these mention both the GCPA and the Endangered Species Act (ESA), while others mention only the ESA. One suggests specific interpretations of the GCPA that must be honored, namely, that scientific information on resources should drive operations and that operations are expected to change if changes will protect, mitigate impacts to, or improve conditions of the resources. One person proposes an amendment to the GCPA that would require compliance with the ESA, while another reminds decisionmakers that the GCPA is not intended to affect water allocations secured by compact or decree. Another expresses concern that some people are trying to increase the share of water assigned to them under Section 8 of Colorado River Storage Project Act (CRSPA). According to the U.S. International Border Water Commission, the Modified Low Fluctuating Flow Alternative (MLFFA) will not interfere with the required delivery of water to Mexico. One commentor questions the legality of annual releases greater than the minimum when those releases are authorized for reasons other than to avoid spills or equalize water storage between Lake Powell and Lake Mead, and requests that no changes be made to this rule. Some others raise questions about the "legal" apportionment of water among the upper basin states, particularly New Mexico's share.

c. No Action Alternative (NAA)

Most of the comments about this alternative refer to some aspect of the description of the alternative in the DEIS. One commentor requests a clear statement that the current ecosystem evolved under conditions represented by this alternative and that the ecosystem was approaching "equilibrium" under those conditions. Another questions whether or not the NAA should be considered as the base scenario, and still others request clarification of statements about the minimum flow under the NAA. Commentors state that the minimum flow is seldom at the nominal level, and request similar clarification for emergency flows, stating that they are usually short (minutes, not hours), and that releases often remain above the allowable minimum when responding to emergencies. They also request better description of the ramp rates for this alternative, because use of the term "unrestricted" implies that the full ramp rate range is used. One suggests a figure describing ramp rates as a percentage of time representing the frequency of use. Finally, one person suggests that this alternative is the best way to protect energy and energy users.

d. The Fluctuating Flow Group of Alternatives

The comments in this group generally refer to fluctuating flow alternatives or to more than one of the specific alternatives. Some commentors note deficiencies in the descriptions. First, commentors questioned the use of "unrestricted" because the NAA and the Maximum Powerplant Capacity Alternative (MPCA) do have some physical and institutional restraints with which they must comply. Second, some feel that the EIS should acknowledge that weekday and weekend flows would continue to differ. Some request clarification of the additional energy purchases under the MPCA to note that purchases would be made during the night and minimized during the day. One person argues that alternatives allowing daily fluctuations are harmful, while another says that the Moderate Fluctuating Flow Alternative (MFFA), MLFFA, and Interim Low Fluctuating Flow Alternative (ILFFA) all appear to represent acceptable compromises between dam operation requirements and ecosystem benefits. Two others point out that the Low Fluctuating Flow Alternative (LFFA) is not now part of the DEIS and that the endangered fish research flows are the only substantial difference between the LFFA and the MLFFA.

e. Maximum Powerplant Capacity Alternative (MPCA)

Beyond those mentioned briefly in subsection "d" above, Reclamation received no comments specific to the description of this alternative.

f. High Fluctuating Flow Alternative (HFFA)

The sole commentor who addressed this alternative indicated that it should be the preferred alternative. Reasoning that most of the environmental protection would come from elements that are common to all restricted fluctuating flow alternatives, this person argues that research indicates an insignificant difference to the environment no matter which restricted fluctuating flow alternative is selected.

g. Moderate Fluctuating Flow Alternative (MFFA)

Several comments on this alternative reflect a desire to see it as the preferred alternative for the following reasons: (1) it represents a better balance of the uses of the Colorado River resources; (2) most of the cooperating agencies do not oppose it; (3) the impacts of the MFFA on ecosystem, cultural, and recreational resources are very similar to the impacts of the preferred alternative, but the economic impact is much lower under MFFA; and (4) the alternative with the lowest economic impact should be selected unless Reclamation can make a convincing case for its preferred alternative. Another commentor concedes that this alternative begins to address the problems but claims it does not go far enough. Some also express a desire to see the endangered fish research flows replaced with a continuation of the moderate fluctuating flow research.

h. Modified Low Fluctuating Flow Alternative (MLFFA)

i. Development and Definition

Because this alternative has been chosen as the preferred alternative, it drew the largest response from the public. While many support its selection as the preferred alternative, some do not. Many commentors did not understand the rationale behind selection of this alternative as the preferred alternative, and some requested that the FEIS include a more precise explanation of the reasons for the selection, a better definition of what a preferred alternative is, and clear identification of where the discussion of that alternative can be found. A few suggest that the selection of the MLFFA as the preferred alternative instead of the SASFA indicates that power production was the deciding factor and request clarification of this. Others want to know why this alternative was preferred over the MFFA. Additional concerns registered were that: (1) the effects of the preferred alternative (with the research flows) have not been adequately studied; (2) the preferred alternative must meet some threshold of economic analysis and justification; (3) Reclamation has not established a

ceiling cost at which this alternative would be eliminated; (4) the effects of the research flows on this alternative are not clear; (5) the parameters of research should not be set in the preferred alternative but should be part of the Adaptive Management Program (AMP); and (6) this alternative represents a compromise and the time for compromise has passed. One person suggests that those who benefit from this alternative should pay the costs.

ii. Comparison to Other Alternatives - Impacts

The inclusion of the endangered fish research flows in this alternative makes it difficult to asses the impacts of the alternative because so little information is available on how the research will be conducted and timed, and one person asserts that this is a violation of NEPA. Another suggests a 3–5 year trial period for the preferred alternative, and another wants to know what the public gets from the preferred alternative, since neither cleaner air nor better water quality will result.

iii. Deficiencies and Suggested Modifications

Some people suggest that the flows in this alternative are too high. Others claim that the restrictions are unnecessarily rigid and should be modified. Several commentors refer to a 25,000 cubic feet per second (cfs) maximum flow/4,000 up-ramp rate flow regime that was recommended as a modification to the interim flows by the cooperating agencies and feel that the preferred alternative should be modified to incorporate these flows according to the comments. Supporters of the Reasonable and Prudent Alternative (RPA) and SASFA request that some of the benefits of that alternative be incorporated in the MLFFA or that the MLFFA be defined with more flexibility so that elements of the SASFA could be incorporated at a later date if research shows that it is warranted.

Other perceived deficiencies in the discussion of the preferred alternative in the DEIS include: (1) a failure to justify differences in the daytime and nighttime minimum flows; (2) discussion of the economic and environmental impacts—especially as related to the endangered fish research element of the preferred alternative—that is inadequate to comply with NEPA; (3) more clearly defined resource goals need to be identified; (4) a desire to see some of the flood damage of the 1980s repaired as part of the preferred alternative; and (5) definition of the impact of the preferred alternative on the Upper Colorado River Basin Fund.

iv. Support and Reasons for Support

Many reasons for supporting the preferred alternative appeared in the comments. They include: (1) it is best for the Grand Canyon ecosystem, it moderates fluctuating flow damage (stabilizes fluctuations), and begins to improve the resources at a reasonable cost; (2) it gives Grand Canyon protection a higher priority than power generation; (3) it emphasizes endangered species; (4) it provides for adaptive management and long-term monitoring; (5) it puts science first; (6) it balances power, water, and environmental needs; (7) the economic exception is not part of the preferred alternative; and (8) it provides for high releases that are fundamental to beach restoration. Other comments support the preferred alternative conditionally. They support the alternative if: (1) long-term monitoring and adaptive management are adequately funded and are developed with public involvement, scientifically based, and insulated from political pressure; (2) a long-term solution to sand depletion is funded; (3) endangered species research is subject to peer review such as the National Academy of Sciences process; (4) that studies are funded and begin on the feasibility of a device that will allow warm water to be sent downstream to protect and restore endangered species; (5) articulation of the relationship between future flow decisions and the scientific and monitoring data; (6) inclusion in FEIS of a specific timetable for creating the AMP; and (7) inclusion in FEIS of a commitment to scientifically sound research on the effects of SASFA and low fluctuating flows on endangered species of native fish.

v. Legal Mandates Concerning the Preferred Alternative

Comments in this section suggest that this alternative best meets the mandate of the GCPA and have negligible impact on the Colorado River Compact.

i. Interim Low Fluctuating Flow Alternative and Interim Operating Criteria (ILFFA and IOC)

i. Definition

People who submitted comments equate the ILFFA with the IOC and some suggest that changes should not be made to the IOC until after adaptive management review. Others allege that changes to the IOC recommended by the cooperating agencies were blocked by Reclamation or that the IOC and the changes suggested to them need further study.

ii. Support for ILFFA and IOC and Reasons for Support

Several comments reflect the sentiment that the ILFFA should be the preferred alternative (with the changes suggested by the cooperating agencies) or is the best starting point for future operation of GCD. Some people would like to see interim flows become permanent if budgetary restraints eliminate future studies, while others feel that the interim flows give balance to the economic side of the environmental-economic scale.

iii. Opposition and Reasons for Opposition

Two reasons emerged in the public comments for opposing the ILFFA and IOC. The first is that they do not afford enough protection to endangered species, while the second is that problems created by the IOC, such as those summarized under individual resources, will continue under the preferred alternative.

iv. Impacts of the ILFFA and IOC

One person writes that adjustments to dam operations made by the IOC have benefited all of the canyon resources and river habitat. Another feels that they have adequately addressed the problems caused by dam operation, and states that the preferred alternative inappropriately tries to solve problems for which operations are not responsible. Some people argue that two years of the IOC have given us a good idea of effects on resources, but others counter that 2 years is not a sufficient data base on which to judge future operations.

j. The Steady Flow Group of Alternatives

One person feels that the steady flow alternatives provide better overall results, while another states that science has not proven that steady flows are best for preserving the Grand Canyon and even may cause environmental degradation. Another declares that the SASFA and Year-Round Steady Flow Alternative (YRSFA) would reclaim for now and the future the natural flow of the river. Some register disagreement over the feasibility of using "habitat-building flows" with the steady flow alternatives due to unpredictable impacts on resources other than sediment related ones. Others note that the dam would likely not be relied upon for Automatic Generation Control if a steady flow alternative is implemented. Some raise questions about the graph on p. 31 and its failure to show the SASFA pattern for a moderate release year.

k. Existing Monthly Volume Steady Flow Alternative (EMVSFA)

Some people reflect a preference for this alternative as the least costly and as a reasonable balance between economic uses and environmental protection. One person attaches conditions, wanting to see the alternative coupled with sediment augmentation, habitat restoration flows, and selective withdrawal structures. Another does not understand perceived discrepancies in reliable minimum flow numbers for this alternative (8,000 cfs or 9,000 cfs).

l. Seasonally Adjusted Steady Flow Alternative (SASFA)

i. Flows and ii. Impacts

Comments vary in their treatment of the flow patterns of the SASFA. One person suggests that the SASFA's flow patterns provide a much

needed baseline, while another says that they are not a "natural" flow regime. Others state that the tables on pp. 60–65 of the Summary and pp. 54–61 of the DEIS indicate that the SASFA provides the best overall results.

iii. Reasons for Support and Opposition

A number of comments reflect support for the SASFA. Some of the reasons mentioned are: (1) it best meets the mandate or is the most reasonable; (2) it improves the aesthetic and wilderness value; (3) none of the other alternatives addresses the concerns as effectively; (4) it offers the most environmental benefits; (5) it does the most to restore pre-dam conditions; (6) it is a long-term investment in the health of people, wildlife, and the economy; (7) it addresses all concerns with the most balance (except possibly electricity); and (8) the FWS opinion in favor of the SASFA should be given high priority. Those who oppose the SASFA state simply that it would not be a good alternative and that it does not balance the demand for scarce resources.

iv. Suggested Modifications and Questions

One person requests inclusion of the endangered fish research flows in the SASFA. Another wants to look at the possibility of fluctuating flows in August to reduce the economic impacts of the SASFA. Some say the analysis of the economic impacts is inadequate or may be understated. Another asks if there will be an increased likelihood of spilling under the SASFA and what the ramifications would be.

m. Year-Round Steady Flow Alternative (YRSFA)

The two comments received on this alternative state that the river would be more like a canal under this alternative and question whether the discussion on p. 28 of the Summary is contradictory.

3. Elements Common to all Restricted Fluctuating Flow and Steady Flow Alternatives

The DEIS described seven elements common to all restricted fluctuating flow and steady flow alternatives. Two of these will not be discussed here but are included in the discussion of the particular resources to which they are related. **Comments concerning the new population of humpback chub are discussed with other endangered fish issues. The protection and monitoring of cultural resources is included in the overall discussion of comments concerning cultural resources.** These elements common to the restricted fluctuating flow and steady flow alternatives generated extensive comment. Unlike other sections of this report, this discussion will consider these elements in alphabetical order rather than the order in which they appeared in the document.

a. Adaptive Management Program (AMP) and Long-Term Monitoring and Research (LTM&R)

i. Legal Mandates

Many comments identify adaptive management as a key to the future successful operation of the dam and implementation of the objectives of the GCPA. This section will also discuss long-term monitoring and research (LTM&R), which is viewed as a critical component of adaptive management.

Because the members of the public generally viewed the AMP as being in the development stages, many chose to point out the various legal mandates that they perceived would or should impact this program. Comments most frequently mention the GCPA as containing directives that should impact the AMP, noting that the GCPA's basic principles provide a necessary base for any future management program. In addition, some feel that the GCPA requires inclusion of the AMP and LTM&R in the Record of Decision (ROD) while others point out that the particular form it should take had not been mandated. According to some, the

GCPA mandates only LTM&R, not the AMP. Because so many decisions are being left to the AMP and LTM&R, one commentor questions the adequacy of the DEIS in meeting the mandate of the GCPA "to describe long-term operations and other reasonable mitigation measures." Many also question LTM&R's ability to meet the mandate of the GCPA because it lacks clearly-defined research design and objectives. Some also note, however, that the preferred alternative might not be a final answer and only an AMP and LTM&R could show whether fluctuations should be allowed. Several commentors point out that the GCPA mandates a certain consultation process that must be followed for all adoption of interim operating criteria and all post-decision research.

Comments also address the fact that the GCPA was not the only legal mandate having an effect on the AMP. One mentions that compliance with the GCPA, the management objectives of Grand Canyon National Park (GCNP), and the Indian trust responsibilities involved impose unique and complicating factors on the outcome of the AMP. The ESA, the National Historic Preservation Act, the Federal Advisory Committee Act, and NEPA are all mentioned as having an impact on the possible implementation of the AMP and LTM&R. Commentors suggest that the relationship between the AMP and these legal mandates should be clarified. Regarding NEPA compliance, commentors suggest that (1) more effort be made to identify issues that might require future NEPA consideration, (2) what NEPA response might be required should be identified if possible, (3) deferring the definition of the AMP and LTM&R violates NEPA because the potential impacts of the alternatives are not fully understood, and (4) unless the AMP will have legal responsibility for NEPA compliance, there is no reason to create another bureaucracy.

Comments raise two additional legal concerns. First, one commentor requests that if the AMP will have legal authority to implement modification of flows, authority and methodology be spelled out in legal terms. Second, a commentor states with concern that the National Park Service (NPS) and FWS can not abdicate responsibility to protect resources for which they are legally responsible.

ii. Definition and Organization of AMP

The DEIS drew many comments indicating support for the concept of adaptive management. Because of the "dynamic nature of the river system," the public views the AMP as necessary or "the most scientifically defensible" way to manage the system. It is also seen as the best way to balance the competing resource needs. Because they regard AMP and LTM&R as such critical components, some commentors express disappointment in what they perceive as Reclamation's response or lack thereof to an AMP-like process through which the cooperators have suggested some changes to the interim operating criteria. This caused some people to question whether the AMP process would work in the future. Others point out that the changes had not been suggested in an "AMP process" and the two were not comparable. A few comments that oppose the AMP focus on whether adaptive management would work for the benefit of the natural resources or become synonymous with "adaptive damage," and whether adaptive management will increase the risk of manipulation of the outcome.

Commentors identify the DEIS's "loose" description of the AMP as a matter of concern. In fact, the largest number of comments about the AMP indicate that the DEIS's definition of the AMP is insufficient and that the description in the FEIS must be more complete and/or that specific deadlines should be set for its complete development. While many request more complete details about the program, a few caution that one of the great benefits of the AMP should be its flexibility to respond to changing needs and that the flexibility should not be impaired by too rigid a definition.

Commentors recommend the following factors for consideration in the development of the AMP: (1) the AMP should be developed with public involvement and/or include a process for

public review and comment; (2) the AMP should be scientifically based; (3) the AMP should be insulated from political pressure; (4) the AMP should be developed with real-life time frames; (5) the AMP should set forth powers of enforcement; (6) the AMP should allow consultation by all interested parties; (7) the AMP should include a process and authority for implementing change; (8) the AMP should define make-up, organization, cooperation among, and responsibilities of various work groups; (9) the AMP should state who will be responsible for leadership of the AMP; (10) the AMP should include mechanisms for implementation, including spelling out funding sources; (11) the AMP should have independent scientific oversight/review; and (12) the AMP should spell out a specific means of arbitration.

The issue of who would provide leadership for the AMP generated a substantial number of detailed comments, as did the make-up, organization, responsibilities, etc. of the various work groups. Comments about the leadership for the AMP suggest that the FEIS should be clear about who or which agency will be leading the AMP. A substantial number of commentors indicate a desire to see the Secretary of Interior or a senior official who reports to him directing the AMP. A few express the feeling that leadership should not be given to Reclamation or any other resource agency. Others feel that the NPS should lead or play a strong leadership role in the process because of their resource management responsibility. Another requests that the FWS play a strong role because of the endangered species issues involved. On the other hand, another fears that too much authority vested in FWS will undermine the AMP. Objective leadership is the primary concern of one commentor, while another recommends that a senior scientist oversee the AMP.

Participation in the AMP interests many commentors. Public participation; participation by the Seven Basin States and locally elected officials; and participation by the Tribes, agencies, and interested parties who have worked on the EIS are all advocated. The necessity of spelling out just how such groups will be brought together, under what format they will work, and what their responsibilities will be generate a number of recommendations. Comments show support for the establishment of three basic work groups (in a two-tiered forum): the AMP Work Group, the Technical Work Group, and the Independent Scientific Review Panel. Some other names are suggested for these groups in specific comments, but the names have been standardized in the comment summary for clarity. This does not imply a preference for the final adoption of any specific name.

Several commentors suggest that a Federal Advisory Committee be involved in the AMP and others urge that the AMP Work Group be organized under the Federal Advisory Committee Act. Some express concern that all three work groups need to be kept at a workable size. One endorses a specific plan for a 25-person AMP Work Group including representatives of the Seven Basin States and the 12 cooperating agencies, with two seats each for contractors for the purchase of power, environmental interests, and recreational interests. Others suggest that representation by power and water entities should not exceed that allocated to cultural and downstream resource representatives. Some mention that reimbursement of non-government participants must be addressed.

Commentors also mention the possible responsibilities of the AMP Work Group. Some suggest that this be an advisory rather than executive body, with the senior Department of Interior official being responsible for implementation of recommendations made by the work group. Others envision the work group as responsible for carrying out the Secretary's consultation obligation under the GCPA. Some suggest that the work group produce an annual report that would be made public and would detail current research, expenditures, etc. Commentors also make recommendations on how the work group should reach decisions. Some feel it should be by consensus; others by an 85% vote of members. Some urge that all meetings be public.

Commentors also express some sentiment for eliminating this group and assigning its responsibilities to the Independent Scientific Review Panel (ISRP). Some express reservations about the impact of the "various agendas" of the committee members on the outcomes. Some suggest that committee members base decisions on solid science rather than on political concerns as a way to prevent possible dramatic swings in operations over time. They also suggest that consideration of all scientific, economic, and Law of the River issues is necessary and will lead to consideration of less restrictive as well as more restrictive measures as indicated by the above factors.

One group of comments urges that the composition and role of the Technical Work Group (or Advisory Panel) be clearly articulated. The possible duties of this group mentioned by various comments include: (1) making proposals for changes in flow regime to ISRP and the AMP Work Group (including complete justification); (2) defining standards and criteria for long-term monitoring; (3) formation of subgroups to deal with specific issues; and (4) maintenance of an adequate information base on which to base recommendations. Inclusion of a member of the public, a student volunteer, a member of the academic community, or a representative of an environmental organization is suggested in one comment, while another suggests that all resource management agencies be included at this level to some degree.

One commentor views the ISRP as "critical." Another group recommends that the Secretary of Interior appoint the members of the ISRP from a pool of qualified candidates recommended by the National Research Council. The possible duties of the ISRP outlined in the comments include: (1) sending reports on monitoring and research to the Work Group and Senior Official on a regular basis; (2) reviewing final research reports and proposals and being empowered to accept or deny proposals; (3) preparing an annual report on the state of the LTM&R for the Secretary of Interior and for distribution to the public; (4) developing (after consultation with the AMP Work Group and Technical Work Group) the long-term monitoring plan, budget, and research program; (5) recommending modifications in dam operations; and (6) assuring that monitoring achieves the goals of the resource agencies. One comment suggests that the panel "be limited to evaluations of technical issues and scientific credibility and not to review proposals, analysis or conclusions with regard to appropriateness of management goals or political agendas." It is suggested that the ISRP report to the same senior Department of Interior official suggested for the other work groups. The U.S. Geological Survey (USGS) and National Biological Survey (NBS) should play a role or lead in ISRP and AMP according to one comment. Another comment request that anyone seeking to do so be allowed to review and comment on research proposals. These documents/discussions should not, according to the comment, be treated as sensitive.

iii. Definition and Organization of LTM&R

Long-term monitoring of the Colorado's resources drew the support of a substantial number of the commentors, many of whom view it as essential. Some suggest that the conclusions reached by long-term monitoring should form the decision-making base for the AMP. The FEIS should discuss LTM&R in more detail, according to some. Issues of concern identified in the comments include: (1) there must be an adequate source of funding; (2) all interested parties should be included in consultation; (3) LTM&R must be clearly designed, comprehensive, flexible, efficient, cost effective, and non-intrusive; (4) LTM&R must be based on specific, achievable goals of the AMP; (5) LTM&R should be insulated from political pressure; (6) LTM&R should include provisions for periodic public and independent scientific review and/or possible review by the National Research Council; (7) LTM&R should be built on quantitative standards and avoid non-quantitative data; (8) LTM&R should provide scientific support (convincing evidence) for any changes recommended by the AMP; and (9) LTM&R should provide timely reports of data to all interested parties.

In addition, several commentors express concern with exactly what should be monitored and how that monitoring should be accomplished to avoid unnecessary intrusion in the area. Water temperature, non-use values, native fish needs, cultural and historic sites, sediment dynamics, Lake Powell geochemical water processes and circulation, and a larger study area are all suggested for inclusion in long-term monitoring and research programs. A number of comments raise the concern that while further scientific study is necessary, such studies must be cost effective and based on appropriate objectives and research parameters.

Some raise questions about specific types of research, and whether and how they should be conducted. The recommendations will not be repeated in this discussion because of their technical nature, but can be seen in the comment summary section being summarized here. Similar specific recommendations for minimizing intrusion and about specific monitoring stations and techniques also will not be restated here. Several comments, however, provide some general recommendations for minimizing intrusiveness, such as compliance with no-motor season, integration of multiple studies into a single trip, and reduction not only of the number of camps established in the canyon, but also visual impacts and numbers of research trips. Again, several commentors urge that all of this be accomplished at a reasonable cost.

A few final recommendations are covered in comments on the LTM&R. The relationship of the LTM&R and Glen Canyon Environmental Studies (GCES) needs clarification, according to one commentor. The use of independent researchers and competitive bidding should be encouraged, according to others. One person asserts that the administrative coordination of LTM&R needs to be clearly defined in the FEIS to prevent dispute, and outlines three possible levels of coordination for LTM&R responsibilities. Clearly, the final definition of both the AMP and LTM&R will interest the public.

b. Beach/Habitat-Building Flows and Habitat Maintenance Flows

Beach/Habitat-Building Flows (B/HBF) were included in the discussion of all restricted fluctuating flow and steady flow alternatives. Habitat Maintenance Flows (HMF) were only included in the discussion of the Moderate Fluctuating Flow Alternative (MFFA), MLFFA, and SASFA. Because comments frequently failed to distinguish between these different types of flows, however, both will be discussed here.

i. Purpose of B/HBF and HMF

A number of commentors claim that the discussion of these flows in the DEIS was incomplete. Some raise concern over whether all the risks to the ecosystem and power have been discussed, whether a lower ramp rate should be incorporated, what specific scientific evidence indicates the need for such flows, why the distinction between the two flows is not better clarified, and why HMF are not included in the other steady flow alternatives or the ILFFA. One comment suggests that the experimental flow for 1995 be discussed in a separate paragraph. The timing of these flows also causes some concern. Some assert that timing should not be predetermined, but rather should be flexible to coincide with tributary flooding or related to the "dynamic balance of sediment in the system." Comments request advance public notice of the timing of flows.

Questions asked about the DEIS discussion of B/HBF and HMF include why the DEIS did not make clear that the pre-dam peak occurred in May or June; why these flows could not be used in high water years to help avoid unanticipated releases; and whether the ramp rates should be more or less restrictive (comments received on both sides). Many indicate that these flows are experimental and should be conducted as such, that the discussion in the FEIS should make clear that the outcome is speculative and these flows will be retained and occur on a regular schedule only if proven successful. Others question statements concerning the need for

such flows, including one who indicated that, contrary to DEIS statements, dynamic marshes are maintained under normal power operations. Another disagrees with the statement that backwater habitats will tend to fill in under any alternative, stating that they are maintained under normal power operations and would be expected to be maintained under the MPCA. It may be possible, according to one commentor, to maintain backwaters at higher levels than 11,000 cfs.

ii. Problems, Deficiencies, and Negative Impacts

This section will discuss some of the more specific questions about the possible problems and impacts associated with B/HBF and HMF. Some people see these flows as a high-risk/low-return venture. Whether these flows will actually build beaches or cause more harm, whether these flows will have serious negative impacts on native fish reproduction, the trout food base, recreation, power, endangered birds nesting, ground dwelling and nesting animals, vegetation (both native and exotic), and whether more sediment will leave the system because of these flows are some of the concerns expressed. The cost of these flows, as estimated by the Western Area Power Administration (Western), is an issue for some. One comment indicates that while some young fish would be transported downstream, the overall population of humpback chub would not be hurt and that trout could be stocked.

iii. Legal Concerns

The central legal issue raised in the comments is whether or not these flows would be legal, since they would exceed powerplant capacity and the Law of the River does not (according to the comments) allow releases in excess of powerplant capacity. This comment questions the justification for including this proposal that "violates law," particularly in light of the fact that the risks are unclear and costly, and sand pumping was discarded because it did not meet NPS management objectives.

iv. Alternatives to B/HBF and HMF

According to some commentors, the DEIS presentation on B/HBF and HMF is deficient because it does not compare the costs and benefits of these flows with the costs and benefits of sand pumping (an eliminated proposal). Sand pumping, many claim, would accomplish the same results. One person suggests that power replacement costs and costs of B/HBF and sand pumping should be compared.

v. Support and Reasons For Support

Several commentors support the concept of these flows. The support for B/HBF and HMF centers on the necessity to return silt and deposit sand in order to minimize the dam's effect on the canyon by slowing beach erosion. One cautions that support for the flows is limited to times when the spring flood danger is minimal. Others support the proposed experimental flows in the spring of 1995 to see if they will be effective in restoring sediment.

c. Emergency Criteria

i. Need

Some commentors support the need for emergency exception criteria and others do not. One feels that there may be times when emergency exception criteria are critical to national security, while another feels that they may be used to undermine the improvements. Conditions are attached to another statement of support, stating that such exception criteria must be reasonable, carefully considered, and must not cause considerable damage to the ecosystem.

ii. Definition

Statements regarding the definition of emergency exception criteria request that such criteria be more "rigidly defined" and "detailed." One member of the public wonders how often these emergencies are predicted to occur, while another wants to know the extent to which the GCD could handle emergencies. Continuing the use of financial exception criteria is an issue identified as needing more attention in the FEIS. Commentors advocate public review and input

on the development of guidelines for emergency exception criteria.

iii. Limits

Commentors suggest that there should be some limits on the frequency and duration of "emergencies." Some indicate that financial exceptions should not be allowed following the ROD. Asserting that Reclamation "should reject all changes or exceptions to the currently proposed flow regime unless they are scientifically justified as good for the Grand Canyon's natural resources," one comment applies to this and other experimental flow changes and reflects the frequently stated belief that science should justify any changes in dam operations.

d. Flood Frequency Reduction

i. Purpose and Need

The public perceives several deficiencies in the DEIS discussion of flood frequency reduction measures, including: (1) concern that there is not a preferred option or that the reasons supporting a preferred option are unclear; (2) failure to include adequate evaluation of the two options; (3) a need for more in-depth studies on the measures and their impacts on upstream resources or the Navajo Irrigation Project; (4) failure to recognize current operation of Lake Powell as a flood frequency reduction measure; (5) inconsistencies in predicted flood frequency under the no action alternative; and (6) estimates of costs and benefits of the measures. Comments reflect two views about the need to employ flood frequency reduction measures. One view is that the canyon cannot tolerate unplanned flooding that "scours sediment from the system." Another is that the justification for these measures is insufficient, since floods are part of the "natural forces [that] produced and maintained historic conditions," and may therefore be beneficial. Comments also express concern that these measures not impair water storage necessary to satisfy long-term delivery obligations to the Lower Basin.

ii. Raising Spillways

This flood frequency reduction measure prompted several questions and concerns in the public comments. Most frequently mentioned is the assertion that raising the height of the spillway gates would require further NEPA compliance, possibly a separate EIS, or a cultural resources survey. This last aspect ties into the suggestion that the impacts of this proposal have not been adequately identified. Commentors express concern over impacts to Rainbow Bridge, fish and wildlife habitat, endangered fish population using inflow areas of Lake Powell, and recreational facilities. They also advocate compliance with requirements of the Clean Water Act, as well as an assessment of stress to the dam structure caused by raising the spillways. Some find the proposal unacceptable, while others prefer it to the reduction of Lake Powell's capacity, and still others feel it should be employed only if lowering the lake level did not provide sufficient protection from flooding or there were a large net positive impact on the downstream and upstream environments.

iii. Change Releases to Insure Additional Storage

Some commentors support this flood frequency reduction measure, noting the following reasons for that support: (1) it better meets the GCPA's call to improve values of Glen Canyon National Recreation Area; (2) it is more prudent; (3) it reduces evaporative losses and increases annual releases; (4) either method will work; (5) it will not violate the Law of the River; (6) it provides protection to cultural and natural resources otherwise flooded or subject to direct access; (7) it saves the $3 million that raising the spillways would cost; and (8) it would not require separate EIS/NEPA/Clean Water Act/ESA/GCPA review. The public also voices resistance to formalization of this measure in the ROD.

e. Selective Withdrawal

i. Purpose and Need

Because warmer water could provide benefits to endangered fish and other resources and might

help maintain the "natural state of Grand Canyon," many commentors request that some means be found to warm the water coming from the dam. Selective withdrawal (or a multi-level intake structure) is viewed as one way to meet this goal. Commentors advocate further study of the costs and benefits of these modifications and a time frame for doing so. Some indicate that these modifications would be much less costly than the implementation of steady flow studies and should be considered first. Others caution that the impacts of warmer water on native fish, non-native fish, and competition between the two are uncertain and require further study as part of the impact analysis for these modifications. Commentors request a more complete discussion of these issues and other cost, benefit, and impact issues, such as the importance of mainstem reproduction as well as any possible interim methods for warming the water and the basis for agency positions on these issues.

ii. Deficiencies, Problems, and Negative Impacts

While some members of the public support the use of selective withdrawal structures, others express concern about this approach, questioning its ability to provide water that is sufficiently warm to benefit endangered and native fish and other resources. These modifications will be costly and the degree of benefit they produce may not justify that expense, according to some. Others urge that every effort be made to establish the efficacy of the selective withdrawal structures before implementation. According to the public comments, the time required to study this proposal, gain NEPA clearance, do the engineering, and obtain funding will be lengthy, and may postpone any benefits for some time. Some say this is simply not a realistic suggestion or that it is an "untested solution to the problem of cold water pollution."

4. Alternatives Considered and Eliminated From Detailed Study

a. General Comments Concerning Eliminated Alternatives

Two opinions fall into this category. The first is that the dismissed alternatives are reasonable and prudent alternatives to the preferred alternative. The second is that reconsideration should be given to dismissed alternatives that more realistically weigh economic impacts and benefits.

b. Run-of-the-River and Historic Pattern Alternatives

i. Support

A few comments indicate support for one or both of these alternatives. Some support these alternatives linked with other options such as sediment augmentation, conservation, and removal of exotic and restoration of native plants and/or animals.

ii. Comments on Elimination

Some commentors question whether the FWS concurred with the elimination of these alternatives and whether the Run-of-the-River alternative was the same as the "hydrologic pattern comparable to the natural hydrograph" advocated by the FWS in the Draft Biological Opinion. The fact that these alternatives were deemed unreasonable because of increased turbidity, disruption of the food chain, and the necessity for sediment augmentation arouses the opposition of one commentor, who asserts that these conditions are more "natural." Another suggests that elimination of these alternatives because a slurry pipeline would take 15 to 20 years to build was unjustified since NEPA was designed to ensure integrated planning and analysis, and feels that this option should be included in long-range planning efforts that would dramatically alter the range of offered alternatives.

c. Reregulated Flow

i. Consideration

Some commentors suggest that this idea should not have been eliminated from consideration, that reregulation has benefits to offer (chiefly power production), and that the issue will be reopened unless it is fully discussed in the FEIS. One commentor requests full use of this alternative while another supports scrapping the idea.

ii. Impacts

Some see reregulation as having the same positive environmental impacts as the preferred alternative while allowing increased power production (with increased revenues). These commentors encourage Reclamation to let the public judge whether the economic benefits outweigh the costs and environmental impacts, and to provide all information required to make that decision in the FEIS. One commentor raises a technical question about DEIS statements on productivity.

d. Eliminated Concepts

i. Sand Pumping and Beach Protection

Some statements concerning sand pumping and beach protection support those concepts and encourage further consideration of them in localized situations or to minimize impacts on power rates. One suggests that elimination of these concepts should be based on scientific or technical infeasibility, impacts on other resources, or cost/benefit analysis, but not because they will be less effective in narrow reaches. Another questions the use of Section 404 language in the discussion as possible justification for elimination. Some commentors, on the other hand, support the elimination of both concepts.

ii. Removing the Dam

Here, too, we find support for both sides of the issue. Some members of the public demand that removal of the dam be considered (one suggests a volunteer effort), and others say it is the only "reasonable" option or should be the preferred alternative. In the middle is the person who feels that we do not now know enough about the effects of removing the dam, but we may in the future. The other side maintains that the idea of removing the dam is "idiotic."

5. Comments on Resources

Many of the comments received address particular resources or the effects of particular proposals on those resources. These comments are summarized here. Comments concerning how a particular alternative would impact an individual resource are included in this discussion rather than with the alternative so that they can be considered along with all other comments on the impact of historic or current operations and proposed changes in operations on the resource.

a. Comments Concerning Multiple Resources

A few comments address more than one resource. These comments cover a number of issues, some of which may appear again under individual resources. One observation states that GCES studies have shown that while water releases can help manage some resources, they are not the only or best way to manage others for a positive change. Other commentors suggest that less fluctuation would go a long way toward enhancing native flora and fauna. Some people think that the "primary concern" should be maintenance of habitat, especially for endangered species and preservation of beaches. While one commentor asserts that non-native plants and animals were part of this ecosystem long before the construction of dam, another claims that diversity of species is the best measure of an intact ecosystem, and adding exotics does not create a healthier system. Along these lines, some commentors emphasize the NPS's objective for all resources: "the perpetuation of naturally occurring resources and processes." Another, however, questions why the NPS has omitted from its objectives flows that reflect the pre-dam hydrograph and studies of a multi-level intake structure. One person favors use of a temperature sensing device to record extremes that would be detrimental to fish and riparian life, but another states that high flow releases are an unrealistic

way to recover endangered fish, and enhance riparian habitat and beaches. Someone else feels that while the links between riparian vegetation in the document are clear, the relationship between water release patterns and the riparian zone are not.

b. Water

i. Water Rights and Delivery

Comments in this area assert that water is an important and scarce resource and Glen Canyon's most important product. Commentors express concern for the effect changes would have on the water, including one who feels that it is unfair to be deprived of water that originally belonged to a certain party, and that a taking implication assessment needed to be done on downstream property and water rights. Another raises a question about what would happen to water that is not used to rotate the turbines, and suggests that the yield of water in the future from Grand Canyon will decline due to boulder dams and higher rapids. A commentor also questions the statement that all alternatives would accomplish Reclamation's objectives for the Colorado River Storage Project reservoirs, as the alternatives differ substantially on how they try to enhance fish and wildlife resources. Finally, one individual believes that the statements of the document are inconsistent with his prior understanding. He believed that the annual minimum release of 8.23 maf was expected 50% of the time.

ii. Water Quality

Commentors in this group question the effect the different releases will have on the quality of water reaching Lake Mead. Some note the fact that the quality of the water released from the dam is different from that of the natural river, and questioned how those differences affect algae production. Some commentors complain that the DEIS should have addressed the impacts of water salinity, which increases due to evaporative losses in Lake Powell. The water quality in Lake Powell also drew some comments, including requests for data to back up statements on lead, possible misconceptions that could arise from statements on dissolved substances, and a request by the National Research Council for a "synopsis of field data on comparative concentrations at varying depths" to clarify statements in the DEIS. Commentors also suggest that the FEIS should discuss the effect of water quality on threadfin shad and their importance to the fishery.

iii. Conservation

One person seems concerned that none of the alternatives includes a compromise on water conservation, while another requests that the loss of usable water due to evaporation in Lake Powell be studied. Others want to see more water conservation efforts in California and Arizona and suggest that storage of water at the source is better for conservation than storage in reservoirs at lower elevations in the Colorado River system. A final point emphasizes that there is not enough water available now to produce a pre-dam magnitude flood.

iv. Cost

A group of commentors registers concern that the water from GCD is "free" and a value should be placed on it. Some complain that power consumers subsidize free water for water users. One comment suggests that a water storage fee be charged and the funds used to rehabilitate downstream ecosystems.

v. Analysis

The comments contain mention of several specific deficiencies or questions concerning the DEIS's analysis of water issues. Among the issues raised are: (1) pre-dam "peaks" being unimodal or double peaks; (2) the effect of flash-floods on flows; (3) possible errors in CRSS models that could have caused errors in statements of probability; (4) lack of study of probability of mobilizing toxic substances due to changes in operations; (5) questions about statements made in the DEIS concerning the effect of water quality, quantity, and temperature on aquatic resources; and (6) suggestions for clarification in tables appearing in this section.

c. Sediment

i. Impacts to Sediment

The lack of sediment in the flows from the dam and the erosion of beaches generated frequent concern. Some commentors suggest that historical dam operations have damaged the beaches and increased erosion, while others say that without the dam there would be fewer beaches or that the erosion is overstated. The effect of fluctuating flows versus steady flows on beach erosion is also argued on both sides. Some believe steady flows would preserve beaches (they would reduce net sand loss), while others say they would destroy beaches. While some express the belief that controlling fluctuation within certain parameters (various numbers are mentioned) can control erosion, others say that floods, rather than daily fluctuations, are the major concern, or that as long as there is a flow of any kind erosion will occur. Opinions also differ on the impacts of floods, with some saying that they cause severe damage and others claiming that the canyon has recovered from the damage suffered during the '83–'84 floods. Still others say that floods (natural or scheduled) are necessary for the preservation of beaches.

Although everyone agrees that the flows from the dam do not bring sediment into the system, they disagree over how much sand is and can be provided by tributaries, how much eroded material leaves the system and how much is deposited in the riverbed, and whether or not particular alternatives influence these factors. Commentors also dispute effect of B/HBF and HMF on the sediment in the system and sediment leaving the system. Some favor the flows, while others oppose them because of alleged impacts on sediment, beaches, sandbars, backwaters, and related issues. The issue of backwaters arouses particular concern, with many requests for clarification of the information contained in the DEIS on this subject and how the various changes proposed would impact backwaters. Commentors also disagree over the impact of ramping rates on erosion and sediment changes, with some indicating that down-ramp rates are the most critical, one asking for more information on the impacts of various ramp rates, and a third insisting that both up- and down-ramp rates cause problems. Commentors also raise questions about the impact that the IOC have had on beaches and other erosion issues. Again, some note improvement and others suggest that the interim criteria have caused damage. According to one commentor, the proposal to repair this damage with high releases raises questions about the preferred alternative and the flow limits it contains.

Some commentors raise questions about how sediment data were measured and reported. Sediment particle sizes in the DEIS need clarification and further discussion of how various particle sizes will respond to flow changes and the effect of those responses on the ecosystem. Some also suggest that more "direct" measurements be used, alleging that "indirect" measurements are unreliable. Statements based on indirect measurements need to be supported with direct measurement data, according to one commentor. A number of people pose questions and offer suggestions about the data and information presented in the sediment sections. Some commentors express particular concern about the uncertainty of the information in Table IV-6, and worry that it may conflict with information in table IV-7. They also wonder whether the data should look at net loss rather than gain. Other specific or technical questions about sections of data or interpretations of that data in the DEIS discussion of sediment will not be restated here, but can be seen in the PCS, attached as Appendix 1 to this report.

Some members of the public view the DEIS's discussion of the impacts of wind, rain, human use (recreation), boat mooring on beaches, and erosion as inadequate. They believe that the EIS should quantify and address these impacts and explain the methods for doing so. Commentors also suggest that impact of vegetation encroachment on beaches requires further, more detailed discussion than is contained in the DEIS. One questions whether the loss of all beaches would truly impact recreation use of the canyon, feeling that perhaps campsites would

just be moved. This person wanted to know where in the EIS this was discussed.

ii. Sediment Protection

Commentors use several terms to indicate what they thought should be done regarding beaches. Many contend that the goal should be to replenish, preserve, protect, and restore beaches. The distinctions among these terms, however, are not clear. For instance, in using the word "restore," commentors do not indicate the date by which or condition to which beaches should be restored. Although this leads to a degree of ambiguity regarding what actions commentors actually advocate, it is clear that they are concerned about the present and future condition of beaches and their importance to the ecosystem. Commentors view some alternatives (No Action, Maximum Powerplant Capacity, and High Fluctuating Flow) as doing nothing to correct beach erosion; they view others (Modified Low Fluctuating Flow or Seasonally Adjusted Steady Flow) as having a positive effect. Some see limiting flows as a way to protect beaches, but others point out that erosion would continue no matter what action man took. Some commentors view changes in dam operation as insufficient to solve the problem. Some also mention other methods to improve sediment conditions, including: (1) employing beach protection measures (such as armoring); (2) silt reintroduction (perhaps by stirring up the bottom of the reservoir) or sediment augmentation; (3) sand pumping or using dredged sediment; (4) use of a reregulation structure; (5) vegetation management; and (6) restoration of areas impacted by human use and boat mooring damage. No one advocates using all of these options, but some mention two or three that could be used together. Of these options, commentors most frequently suggest sediment augmentation. Some request funding and studies of this option as soon as possible and a more complete discussion of it in the FEIS. While some commentors also express the opposing view that sediment augmentation is too costly and unrealistic, one individual criticizes the exclusive use of low cost measures rather than an effective resedimentation program.

iii. Lake Powell Sediment

A few commentors raise questions about sediment issues in Lake Powell. One wonders, for instance, how soon sediment build-up behind the dam will render it useless (half-life). Another challenges statements about sediment quality in Lake Powell and the alleged lack of information on the subject, suggesting that information does exist. A third commentor had expected the DEIS to contain more information on nutrient loading and sedimentation in Lake Powell and the resultant inaccessibility of nutrient mass. A fourth complains about the inadequacy of the analysis of the upstream effects of a rising Lake Powell.

iv. Other Sediment Issues

Because of a photo on p. 67, one commentor questions the definition of a sandbar appearing on p. 91 of the document.

d. Fish

i. Native Fish Issues

Native fish issues are closely related to the endangered species issues, and therefore the reader may wish to review both sections to obtain a complete summary of comments on native fishes. Because some commentors did not relate native fish issues to endangered fish issues, we have distinguished the two for purposes of this report.

Comment on native fish issues ranges from general to highly technical, is critical of different agency conclusions while supporting others, and questions various conclusions in the DEIS and decisions by FWS or Reclamation. Some commentors question the conclusions drawn from the data (or lack of data), particularly relating to:

- pre-dam conditions and post-dam impacts on native fish;
- life cycles in the mainstem of the Colorado River and tributaries (and their relationship);
- the impact of the dam on survivability of native fishes; and

- various alternative operational and non-operational approaches on native fishes.

One set of comments states that the post-DEIS native fish research conclusions should be incorporated into the conclusion in the FEIS.

Some commentors want the EIS discussion on native fishes to reflect the tradeoffs between the loss of native fish and the other environmental benefits from post-dam operations. Others express the belief that the dam has decimated native fish populations.

Various comments address the temperature and fluctuating flow issues as they relate to native fishes. In addition to questioning the conclusions of the data and research, members of the public express opinions for and against methods to warm Grand Canyon river water and moving toward steady or alternative fluctuating flow options for increasing survival rates of the native fish.

Some commentors wish to see more citations and references for conclusions drawn in the EIS. Other comments indicate a need to discuss in more detail native fishes other than the humpback chub and razorback sucker.

One commentor states that the EIS should describe in more detail the full range of benefits associated with the native fishes. Additionally, several offer specific word changes or clarifications needed in the DEIS's native fishes discussion.

ii. Non-native Fish Issues

Reclamation received detailed comments on non-native fish issues. Some commentors note that after the GCD was built, the Colorado River below the dam became a blue ribbon trout fishery, and that the river conditions have been permanently changed. Others raise a variety of questions about the research and conclusions reached in the DEIS. Among the issues receiving attention about non-native fishes are the impacts of:

- flood flows, other flow regimes, and interim operating criteria;
- vegetation (particularly reeds) and algae;
- turbidity;
- tributary spawning opportunities; and
- predator species and competition among and between species (e.g., striped bass and native fishes).

In addition, many question the relationship between stocked and naturally spawning fish, and the effects of various alternatives on those different types of fish. Different strains of trout are discussed as they relate to survival rate and size. Some people want more information on the stocking of trout and the sources of information in the DEIS. Others question the focus on spawning since hatchery fish are the primary source of trout in the river. Some point out an apparent contradiction in the information on the low rate of natural reproduction and the emphasis on natural reproduction.

Some commentors advocate giving priority to endangered fishes over non-native fishes. Consistent with that point of view is the belief that more taking of non-native fish should be allowed to limit further the exotic population. Some commentors question the need for trout population enhancement, particularly as it relates to a preference for preserving native fish.

Other comments on non-native fish include very detailed statements and refer to specific information in the DEIS.

iii. Predation

The effects of predation by non-native fish on native species, as treated in the DEIS, generated substantial comment and difference of opinion. These comments do not address the desirability of the focus on native/endangered fish, but focus on what effects various alternative flow regimes would have on endangered fish.

Many of the comments address the relationship between flow regimes and non-native predator fish versus the native fish. They express concern that the non-native predator fish would

benefit from some attempts to change flow regimes more than would the native fish, resulting in a deterioration of conditions for the survival rate of native fish. Water temperatures and flows dominate these concerns. In some instances, commentors challenge conclusions in the DEIS; in others, they dispute basic research or information. There are also specific claims that a bias exists in the DEIS toward the adverse impacts of the dam rather than predation. Such claims are supported by the comment that some information suggests that during the pre-dam period non-native fish were already competing favorably against native species. Some of the commentors claim that the dam has actually retarded the growth and impact of non-native predator fish.

Some comments urge that more information be added on the habitat and beach-building flows and their impacts on native fish. They also request further clarification and discussion on the causes of the adverse effects on native fish.

e. Vegetation

i. Definitions

The discussion of vegetation issues in the DEIS generated some questions regarding terminology and definitions. One commentor questions use of the term "naturalized community," and suggests a substitute term, "biological pollution." One also requests a breakout in the discussion of exotic and native species, and another asserts that vegetation categories should include percentages for climax vegetation, both permanent beach climax and floodflow climax. Other requests for more information include: (1) naming of indicator species used to gauge riparian health; (2) backup for the statement that errors in estimates of vegetation coverage would be consistent across alternatives; (3) use of additional data on new high water zone (NHWZ) and old high water zone (OHWZ) acreage; and (4) information on the relationship between elevation above sea level in riparian communities and the river stage.

ii. General Impacts (To All Types of Vegetation)

The comments show general agreement that the high, low, and flood levels of water as it goes through the canyon have a direct impact on what types of plants grow, where they grow, and how long they grow there. They also show general acceptance of the terms OHWZ and NHWZ. Some commentors refer to perceived changes in vegetation that have occurred since dam construction and/or since implementation of the IOC. They note changes in the types of vegetation that occur at various places in the canyon (NHWZ and OHWZ) and link these changes to variations in the amount of water available to the different plant types. Some view these changes positively, while others see them as negative, or not "normal." Similar mention is made of changes that might be expected under the preferred alternative or other alternatives and because of habitat maintenance flows (HMF) or beach/habitat-building flows (B/HBF). While some note the benefits of flood flows to the riparian vegetation (such as scouring out unwanted vegetation and periodic watering of high level vegetation) and perceive that HMF and B/HBF would accomplish these positive results, others see the scouring and inundation of vegetation as a potential negative impact or do not believe that HMF or B/HBF (as described in the DEIS) will have sufficient magnitude to accomplish the positive results desired. Commentors also differ in their views of the changes that would allegedly occur as a result of implementation of a given alternative. A number of comments request more or clearer information about exactly what changes would be expected to occur in both the NHWZ and the OHWZ as a result of particular alternatives or flows (including HMF and B/HBF) and seek more documentation of that information.

Some questions arise concerning the data presented in this section of the DEIS. Among these are the following: (1) has aerial photography been used to document an increase in salt cedar; (2) is the NHWZ approaching a stable state and how will changes affect this; (3) is there some bias inherent in the use of "active

width"; (4) what parameters were used in selecting a short-term period of 5 to 20 years; and (5) what is the importance of geologic strata in this whole discussion?

iii. Native Vegetation

One commentor views increased diversity of the vegetation and wildlife in the canyon as a negative impact. This person fears that increases in overall diversity occur only at the expense of native diversity.

iv. Non-native (Exotic) Vegetation

One member of the public asserts that fluctuating flows have allowed non-native vegetation to predominate. Another wants to know what effect dam operations have on the proliferation of Tamarisk and other non-native plants. Others allege that exotic species increase diversity but degrade the system, and question whether the management plan should include some effort to control or eliminate exotic species. Commentors specifically mention Tamarisk and request more information, including correction of some apparent discrepancies in the discussion of flow impacts on Tamarisk.

v. Marshes and Marsh Vegetation

Commentors make several assertions about marshes and marsh vegetation. First, they suggest that fluctuating flows create and maintain marsh and backwater habitat over the long term, whereas the effects of managed high flows may not. Second, they allege that high elevation wet and dry marshes have diminished in size under the interim operating criteria and would increase in size and number if the 25,000/4,000 flow changes were implemented. Commentors also raise several questions, including: (1) How does the productivity of Grand Canyon compare with marsh productivity elsewhere on the Colorado River, and what studies address this question; (2) can the effects of fluctuating flows be separated from the effects of the '83–'86 floods; (3) how were fluctuating flows addressed in the marsh studies, and were there controls for comparison without fluctuations; (4) what data show that marsh vegetation has increased in the Lake Powell area since the floods; and (5) exactly what are the expected impacts to marshes and marsh vegetation for various flows (including HMF and B/HBF), and what data support these expectations? Some commentors identify a few discrepancies in the statements and data presented in the DEIS and request clarification.

vi. Habitat

One commentor suggests that the vegetation should be allowed to naturalize. The birds will nest somewhere else.

f. Wildlife and Habitat

i. Preservation

Some commentors express interest in the preservation of wildlife habitat and the "natural habitat" of Grand Canyon. One person wonders who has jurisdiction over indigenous wildlife, the states and counties, or Reclamation. Commentors also express interest in preserving the Kaibab squirrel and the leopard frog and increasing the mallard population, and request information on the impacts of proposed changes on these animals.

ii. Impacts

Comments in this group fall into two categories. Members of the first category claim various negative or positive impacts of particular flows or as a result of the dam. Members of the second request clarification or expansion of the information presented on impacts to particular species. Claims made in the first group of comments include: (1) the diversity of species has increased since the dam was constructed; (2) the SASFA would have a beneficial impact on habitat and provide conditions favoring native amphibians, reptiles, and ground-nesting birds; (3) water temperature is a significant factor in the well-being of wildlife; and (4) the impacts of B/HBF may include short-term effects on population numbers but potential long-term benefits to habitat.

Those whose comments fall into the second category raise concern about impacts to leopard frogs, neotropic songbirds and other birds nesting in the riparian zone, and the insects

associated with vegetation at the mouths of tributaries. Some note a discrepancy in statements about the nesting location for the violet-green swallow.

iii. Other

A commentor here suggests that the discussion of the spotted bat, an endangered species, in this chapter is appropriate and should be a prototype for discussion of all endangered species as opposed to the current DEIS format.

g. Endangered and Special Status Species

i. Legal Mandates

Several commentors address the legal mandate for endangered and special status species. They point out that only Congress has the authority to grant relief from the Section 7 requirements of the ESA. They also note that the Secretary of the Interior cannot make any decision regarding future operations of the GCD that would jeopardize the humpback chub or any other endangered species. These include operational changes that would result in impacts on hydropower, temperature, sediment, and other factors that would improve conditions for endangered fish. One commentor claims that fluctuating flows, like those in the preferred alternative, cause mortality in young endangered fish, and that Reclamation could be liable under Section 9 of the ESA for takings caused by operations under the preferred alternative. Some note that the additional economic cost of the MLFFA is justified by the need to protect endangered species, as required by Section 7 of the ESA. One states that since the preferred alternative was not part of the FWS draft biological opinion, Reclamation must consult with FWS to ensure that actions will not adversely modify critical habitat.

ii. Impacts to Endangered Species

Impacts to endangered species receive significant comment, ranging in detail and perspective. While many endangered species receive attention, endangered fish are a primary focus for comments.

Humpback chub are the source of considerable comment. The most frequent comment is that the EIS should identify water temperature (not dam operation) as the controlling negative factor preventing humpback chub expansion into the mainstem of the Colorado River. Many other comments focus on the impacts of dam operations on the humpback chub as an endangered species. Some commentors question whether all of the information on humpback chub was presented in the EIS, and request additional information. Others challenge the conclusions about the contraction of humpback chub range in the Colorado River as a result of dam operations. Some commentors state that the humpback chub is better off in the Colorado River than in other places, or that the population is stabilized or better off than in the 1970s. Some suggest that although humpback chub range has decreased, populations have not diminished since the building of the GCD. According to one comment, recent scientific evidence suggests that the humpback chub's range is expanding; this person would like to know more about the results of that research. Some commentors note that the Little Colorado River has become the compressed range for the humpback chub, and point out the beneficial impact of the Little Colorado River on humpback chub populations. One person adds that the Colorado River is the only remaining stronghold for the humpback chub in the Lower Colorado River. Others question or challenge the relationship between trout and humpback chub. A number of detailed comments challenge the science associated with the impacts or implications of GCD operations and impacts on humpback chub.

Razorback suckers also receive comment. Most of the commentors focus on the need to distinguish razorback suckers from humpback chub in terms of their environmental needs, pre-existing (pre-dam) numbers, and the science to support conclusions in the DEIS. Some refer to the status of the FWS recovery program for razorback suckers and the need to accurately reflect the relationship between that program and this EIS.

iii. Protection of Endangered Species

Opinions differ over dam operations and their effect on endangered species. Many comments address the issues of dam releases, resulting flows, and the perceived impacts on endangered fish. Some believe that protecting endangered species is the key to protecting the ecosystem in Grand Canyon. Others question whether enough information is available to assess the impact of different flow regimes on endangered fish. While some commentors support steady flows and various fluctuating flows, others criticize them. Some feel that Reclamation should conduct more research before taking further action. Others are more concerned about how efforts to protect endangered species will affect other resources or uses, particularly the power resource. Some commentors fear that steady flows intended to protect endangered species may actually harm them, either directly or indirectly by harming non-native species with which the endangered species interact in some way. Some commentors claim that endangered species issues would not be adequately addressed unless consideration is also given to water temperature.

Some comments focus on the relationship between protection of endangered species and the GCPA and the EIS. One suggests that the preferred alternative's emphasis on protection of endangered species without consultation with the cooperating agencies violates the GCPA. Others do not believe the endangered fish studies should be part of the preferred alternative or the FEIS.

Members of the public voice a variety of opinions on how research should be used. Some want no additional research, others want to include research in the AMP, and still others offer suggestions about test flows and the approach to or cost of research. Some persons responding to the DEIS express concern about the cost of the research program.

iv. Impacts of Endangered Species Issues on the Process

Some comments focus on the desirability (or undesirability) of protecting endangered species, and the overriding impact the ESA can have on decisions. One group reinforces the priority given to endangered species. Another opposes the emphasis placed on endangered species in resource decisions. The latter opinion cites the need to balance endangered species with other resources and users.

Some comments address the relationship between the ESA and the EIS Process. One expresses concern that the approach of finding a consensus among the varied users in Grand Canyon was jeopardized by the focus on endangered species in the DEIS. Another commentor notes that the original emphasis among resources is on sediment, and that with a shift in focus to endangered species some of the assumptions of alternatives are obsolete.

h. Cultural Resources

i. Site Identification and Importance

Some commentors view cultural resources as needing protection and important to the recreational experience. Debate emanates from the comments regarding what should and should not be considered a cultural resources site and how those sites should be named or labeled in the document. Many of these comments seem to center on terminology used in the DEIS that may need to be adjusted. The specific details of each argument can be identified by reading the comments on pp. 134–42 of Appendix 1. Most comments reflect a desire to see a clearer, more complete listing of what is included in the impact analysis for cultural resources and an explanation of how these sites may or may not be eligible for or affected by national historic register listing and the National Historic Preservation Act. Commentors also suggest specific corrections to boundary lines, report citations, and terminology, and note the possibility that data on this subject as presented in the DEIS are incomplete due to time constraints.

ii. Impacts, Protection, and Monitoring

Commentors generally acknowledge that many and perhaps all of these sites have been impacted previously. One person claims that perhaps 75% have been impacted because of the existence or operation of the dam. Some questions arise in the comments about how various alternatives will or will not change the impact to cultural resources. Some say that the SASFA and MLFFA will reduce impacts, others worry that the HMF and B/HBF will increase impacts, and still others complain that conflicts in the data presented or deficiencies in the studies and data make it difficult to assess the true impacts of the various alternatives and proposals. Another source of confusion is the separation—or lack thereof—of the non-operational forces (such as wind, rain, and arroyo cutting) impacting these resources and dam operation impacts. Commentors suggest that by including riparian vegetation as an indicator for this resource, the impacts would become clearer. While one person asserts that none of the alternatives will stop erosion but may slow the rate of erosion, others are skeptical that operational measures alone will be sufficient, and advocate "remedial actions" such as "in situ preservation" or other non-operational measures. Some say that continued monitoring of these sites is critical to preservation of the sites, but others question whether a long-term monitoring plan is the best way to protect cultural resource sites. The number of sites to be monitored and the intrusiveness of the monitoring techniques also arouse concern. Commentors register support for suggestions concerning monitoring made by the National Research Council and those contained in the Programmatic Agreement.

iii. Management Responsibility - Tribal Responsibilities

While one commentor suggests that the Indian Tribes should work to preserve their historical sites, the majority of comments in this group are concerned with who is responsible for protecting cultural resources and other resources within the boundaries of current Indian Reservations as well as in the territories in which the Tribes have a historical interest or guardianship. The issue of Indian Trust Assets and the trust responsibility of the U.S. Government to the Indian Tribes is central to the discussion. Just how these responsibilities interact may have been clarified in the Secretarial Order 3175 dated November 8, 1993, according to one commentor, in the Programmatic Agreement mentioned by another, or in the Native American Graves and Repatriation Act mentioned by a third. Commentors note the sensitive nature of the information concerning cultural sites and other Tribal resources, but also note the need for accurate information for the development of a scientifically defensible program. One indicated that the trust responsibility (as defined in specific legal cases cited in the comment), the ESA, and NEPA all demand selection of the MLFFA as the preferred alternative and rejection of the SASFA as advocated in the reasonable and prudent alternative.

iv. Legal Considerations

Some of the legal mandates affecting this resource are mentioned above in the discussion of trust responsibilities and site identification. Commentors also mention other legal mandates that may impact cultural resources decisions, such as the National Historic Preservation Act, Executive Order 11593, the 1980 Amendments to the National Historic Preservation Act, and the Religious Freedom Restoration Act of 1993. Members of the public also request more discussion or clarification of the Executive Order establishing the Havasupai Reservation and the Executive Order for the Navajo Reservation.

i. Air Quality

i. Analysis

Some commentors perceive the analysis of air quality and air quality impacts in the DEIS as inadequate and incomplete. The effect of fossil fuel, possible increases in SO_2 and NO_x due to reductions in hydropower generation, and accounting for carbonaceous matter are some of the omissions mentioned. Here, too, commentors recommend some changes in terminology, and question the estimate of 240 miles on page 52 of the Summary.

ii. Impacts

One commentor indicates that the slight impact of the proposed changes on air quality is acceptable, while another emphasizes the speculative nature of the impact of a loss of Glen Canyon peaking power. According to this comment, too little is known about power generation technologies, demand for power, public attitudes, etc. to make more than speculative projections about the impact on air quality in the future.

j. Recreation

i. Importance

Two commentors address the importance the process has given to recreation. One suggests that the river runners are the only or biggest winners in this process. The other expresses amazement that recreational uses along the river have such prominent status in the DEIS.

ii. Issues of Concern

Under the broad heading of recreation, the public identify several concerns, including safety, rafting and boating (including the importance of beaches), fishing, human use impacts, and economic concerns. Comments on safety range from those who assert that the dam has made recreation safer to those who say the whole question of safety (in fishing and boating) has been overemphasized. Some commentors suggest that the SASFA will lead to safer boating and fishing conditions. Others contradict statements that the SASFA will improve boater safety, by noting that rapids will continue to increase in steepness and constriction under the preferred alternative. Two commentors suggest that there may be less costly ways to improve boater safety, and that a warning system for all recreational users could be installed to warn of high water danger.

One commentor says that recreationists need beaches, and another suggests that the MLFFA will lead to better flows, camping, and beaches. Some members of the public dispute the size and number of beaches that will be available for camping under the various alternatives. One asserts that SASFA would provide major improvement in white-water trips, wilderness values, handicapped access, and beaches. While some people feel that regulated flows enhance boating and the boating industry, others assert that flows have a minor impact on the industry and could be defined as an "inconvenience" for the most part. Commentors dispute whether or not the dam improves rafting, and whether or not lower peak flows reduce the white-water experience. They also request identification of ramp rates as affecting rafting and angling, advocate inclusion of access to the lower reaches of the canyon by power boats from Lake Mead, and request clarification of the impact of decreasing discharge rates on exposure of submerged cobble. Other corrections suggested for the document include the addition of white-water trip quality and recreational environment to Table II-7, indicating that 17 commercial companies operate within GCNP, and changing the waiting period for river-running permits to 10–12 years. Another suggestion would set aside 5% of user days for special access trips to be paid for by power and water funds.

The discussion of the trout fishery in the DEIS generated several questions and concerns. Commentors note that blue-ribbon trout fisheries have developed below dams on the Colorado River despite fluctuating flows. Loss of individual trout due to stranding during spawning may detract from the angling experience, one commentor notes, but would not significantly impact the number of fish available to sustain angler enjoyment. Another feels that the DEIS should have mentioned changing nutrient conditions in the reservoir and watershed and projected the resultant impact on the trout population in the tailwaters. One person asks for clarification of the discussion of stocking and fishing regulations as efforts to improve trout productivity. Commentors also request additional information on trout diet and the stocking of fingerling and sub-catchable trout from 1964-1971, and suggest corrections to citations information on trout productivity. One person also suggests that the text description of impacts on

recreational fishing does not seem to match the summary table information.

Several comments indicate that recreational use of the canyon has increased and will continue to do so, and one person adds that this use is limited by NPS restrictions. Others suggest that perhaps more limits on use or use patterns will be necessary, and one even suggests that recreational use be eliminated. These commentors state that the management of human use of the canyon resources is an issue needing further consideration. One person wants to know how the changes will affect another recreational use of the canyon, duck hunting.

Commentors note that recreation plays an important role in the economy. They raise concern, however, over how the recreation values were determined, with some worrying that recreation values were overstated (because of the method used to derive them), or at least it was difficult to understand how they were derived. Several comments that do not echo concern over the valuation figures name particular alternatives as providing valuable economic benefits to recreation. Some comments reflect a desire to see more income generated from recreation user fees and tourism fees, whereas one states that user fees cannot offset power losses. One commentor feels that the DEIS minimizes the economic importance of tourism to the Navajo Tribe. Another suggests that a correction (modification of the recreation section) would be required if the use of non-use values has been approved for inclusion in the EIS.

k. Hydropower

i. Importance of Resource

Comments on the importance of hydropower produced at the GCD are diverse and reflect a broad spectrum of interests and conclusions about the relationships between dam operations for power production and the ecosystem of Grand Canyon. Comments emphasizing the importance of the hydropower production note that the power produced is clean, inexpensive, renewable, and non-depleting of natural resources. They also emphasize that the GCD was built because of the need for and the ability to produce clean, never-ending power, which has paid for the Dam, the GCES studies, and helped make a success out of the dam and the CRSP. Some consider it "unfair" to interrupt power delivery to those who have paid to build the facility. Thus, many suggest that meeting clean power needs is a high priority and more important than changing beaches.

Opposing comments suggest that electricity should be the last priority since in this view ecological, geological, and native resources must come first, and recreational considerations second. Claiming that production of electric power—especially peaking power—results in defacing a "wonder of the world," one person urges that releases for peaking power be eliminated or drastically reduced. Some feel that the utility companies' "bottom lines" should receive less or no consideration and the emphasis should be entirely on environmental preservation.

Between these extremes, some suggest that conservation can greatly reduce the demand for electricity, thereby reducing the need for GCD power. Others dispute this view, contending that even with conservation, the demand for electric power will continue to grow and likely double in 35 years. For some, the future power demands as reflected in the projections of Western and those of the DEIS should be integrated to resolve conflicting reports on future energy demand.

One set of comments addresses the possibility of replacing peak power production that would be lost at GCD by increasing peak power production at Hoover Dam, or at Flaming Gorge. Some suggest exploring this option in the final EIS, including a report on the status of the Hoover Modification Project and its use as replacement for GCD peaking power. Others maintain that moving peaking power to Hoover Dam is easier than rebuilding a ecosystem, and should be done even if changes in the law are required. Still others suggest that peaking

power production should not be transferred to Hoover Dam because of the impact such action would have on critical habitats, sport fisheries, and the recreational use of Lake Mead.

ii. Cost of power

The public comments on power costs also vary widely. Some people suggest that hydropower is sold below market rates, and contend that these rates constitute a subsidy that should be eliminated, forcing power users to pay the true cost of power production. Along the same lines, some suggest that low rates cause overuse of power, population growth, and development that should not occur in the desert climate. Others suggest that reducing power production at GCD is a small price to pay for improved habitat, protection for endangered species, and better conditions in the canyon below the dam. Similar views suggest that power producers/users bear some or all of the responsibility for environmental damage below the dam and should pay for the damage.

A different set of comments suggests that GCD power was not cheap when initial subscriptions were made and that it also required investments in transmission lines. Some people note that the cost of power initially was higher than power from thermal plants using fossil fuels. Customers originally paid the higher prices based on the expectation that costs and prices would decline; it was this expectation that encouraged the economic growth. Electric power from GCD should not be curtailed because the cost of alternative sources is much higher (opinions expressed a variety of estimates). Some assert that humans with power needs are more important than fish or any other resource. In forceful language, one person claims that "to say there is a giant subsidy is a lie."

Some members of the public suggest that cheap power encourages the misuse of water in irrigation of crops and thus increases the cost of water projects such as the Central Arizona Project. Others suggest that higher power costs from "unclean" alternative sources will pollute the environment. Many people focus on the impact increased power costs will have on certain users, indicating concern about the potential hardship faced by the elderly and other fixed income groups, and on farmers with sizeable power needs (especially those who do ground water pumping), and the limited ability of these users to absorb increased costs. Some allege that reducing peak power and increasing off-peak power reduces the value of all GCD power while substantially increasing power costs to users. Estimates of the monetary costs of such losses vary over the many comments. Some people suggest that the financial costs to power users greatly exceed the gains to recreation or other factors in the system.

Some offer more complex comments, suggesting that the EIS process is a second guess at benefit/cost analysis made prior to dam construction and upon which reimbursable and non-reimbursable costs were allocated. They also claim that the DEIS attempts to reallocate facilities to non-reimbursable uses after the costs have been repaid as reimbursable. Furthermore, they raise questions about the cost of uprating and rewinding generators at GCD and who will pay the costs if these improvements are not to be utilized fully.

Some believe that power users should pay for all environmental damage, while others contend that if power production is curtailed or the cost of power increased, the users should be compensated for the costs of obtaining alternative sources of power.

Many dispute the costs and effects of reduced power production or increased power rates, and while some consider the cost estimates very low, others think they are too high. Comments vary greatly in their assessment of the monetary costs and impacts.

In sum, there are wide differences of opinion on environmental costs, power costs, and on the alternatives that should or could be implemented. Not surprisingly, there is no consensus on the costs already incurred or paid, nor is there agreement on who should be compensated for

changes and who should pay the costs incurred by all types of users resulting from whatever changes are implemented.

iii. Impacts of Proposed Changes in Dam Operation

Most of the comments in this section address the impacts likely to be felt by power users from reduced power production at GCD, and the expected increases in power costs when hydropower is replaced by alternative power sources. The impact of the preferred alternative or its modifications will lower marketable capacity with lower on-peak energy and greater off-peak energy. The comments reflect some uncertainty about how much power will be lost and about the resulting changes in electric rates. Those comments relating to increased power costs are addressed above in "Cost of power."

Some commentors suggest that the DEIS is deficient because it does not identify alternative sources of power, estimate the costs of alternative power, or explore the impact of these changes on the western power systems. Nor does the DEIS propose a mechanism to keep the electric utilities whole, nor to compensate farmers or low income families who may be forced to relocate or abandon their current businesses. A variety of additional comments relate to the perceived potential for job losses and dampening of the entire regional economy.

On a more technical level, one person suggests that the EIS should specify a preferred mix of replacement resources and additional needed facilities, including transmission reconfiguration and the relative reliability and maintenance requirements of alternative sources of power. Some express the view that the relationships between water management and changes in dam operations have not been dealt with adequately.

Commentors express estimates of power loss due to interim operating criteria or the implementation of the preferred alternative in a variety of terms. Some project loss of generation capacity in percentage terms from 33–50% at certain times of the year, while others express their estimates in megawatts, and estimate losses at anywhere from 400 to 800 megawatts. Still others assign monetary estimates to the loss; these estimates range from $41 million to $55 million. Another commentor suggests that the changes would result in rate increases up to 100%.

Some people allege that the rise of regional transmission groups, the National Energy Policy Act of 1992, the Clean Air Act Amendments of 1990, and initiatives like those of the California Energy Commission will change energy demand and utilization patterns throughout the West, affecting the availability of surplus power. They claim that these factors have not been adequately covered in the DEIS. One person also notes that Section 1809 of the GCPA mandates identification of economically and technically feasible methods of replacing power generation within two years, and then asks how this directive can be carried out while the 5- to 10-year research program is being conducted.

A few commentors also repeat the opinion that damage caused by reducing electric power produc-tion far exceeds the positive impacts resulting from the flow changes.

iv. Alternatives to Hydropower Generation

Commentors critical of hydropower generation suggest that it is necessary to find alternative sources of power that do not harm the environment. The alternatives suggested in various comments include wind, solar, and nuclear power. Some suggest that conservation and demand-side management could alleviate the need for alternative sources of power. They also suggest that the new powerplants envisioned by the DEIS should be avoided through demand-side management and changes in national energy policy. Some note that although hydropower may seem cleaner, such power is not without its adverse consequences. Some also claim that using hydropower for base load with peaking power coming from dirtier fuels could minimize total economic and environmental costs.

Others focus on alternatives required to replace power lost by changes at the dam. They suggest that the DEIS lacks foresight on alternatives and that people who want change should provide a good, clean, alternative power source and be willing to pay for it. Many comments focus on the environmental consequences of using fossil fuels and the possible impact these fuels would have because of increased mining and transportation and impacts on air quality.

Power users dispute the relevance of conservation to make up for or reduce GCD power production. They suggest that conservation is already being pursued and should not be considered an alternative since it is independent of decisions on power generation. Others believe that conservation will be offset by future growth and is not relevant to GCD operations.

Other commentors claim that the EIS should study options for storage of electricity that could solve the peaking problem. Two other suggestions are that more turbines be installed so that the same water flows could be used twice thus creating twice the power, and that surplus power be used to pump water from below the dam back into Lake Powell to create maximum energy efficiency.

v. Analysis of Power Issues in the DEIS

Comments on the analysis of the electric power generation cover a number of issues. Most relate to questions and challenges regarding the calculation of costs and benefits, including questions on assumptions, data used, time periods, appropriate discount rates, models used, and even on whether change should be expressed in percentage terms or dollar terms. A number of people request that the methods, data, and assumptions be documented in greater detail in the FEIS. Others address the calculation of economic impacts, whether the appropriate assumptions have been used, and whether all of the appropriate impacts have been considered for both the cost and benefit.

Some commentors express opinions regarding whether conservation or changes in conservation—either due to technology or increased prices —should or could be a part of the analysis. Users believe that conservation measures are relevant to an evaluation of the impact of changes in GCD operations. Others address expectations about the extent to which technological changes over the next 50 years can be identified and factored into the analysis. Comments on demand-side management likewise indicate that this concept must mean different things to different people. Finally, some comments suggest that the DEIS lacks consistency and is not always clear in specifying the marketing arrangements or contractual arrangements in treating costs or prices when considering changes in GCD power production.

Comments also address the analysis of replacement capacity or replacement power, what appropriate technologies should be considered, and how replacement capacity or power might impact on exchanges and distribution costs. This is another area in which the various comments are based on sharply divergent views of what is possible, what is needed, what is desirable, and who should be prepared to pay the costs. Opinions also differ on the analysis of the so-called "small systems" and the accuracy of the conclusions from that analysis.

The above discussion is a brief overview of the comments in this section. The individual comments are technical, highly specific, and are based on quite different understandings of what the DEIS data and analysis show. Those wanting to understand the specific nature of the questions and concerns should consult the Public Comment Summary in Appendix 1, where each unique comment is reprinted. Summarizing these comments in detail here would require a virtual reproduction of the PCS Hydropower Analysis section.

l. Non-Use Values

i. Inclusion

Some comments urge that the non-use value studies be completed, placed in the FEIS, and continued as part of long-term monitoring and

adaptive management; others claim that the concept of non-use values is too subjective a measurement and should not be used to govern the operation of the dam. Some people find it unfortunate that the non-use values studies and data were not part of the DEIS, while others feel that the information should not be included in the FEIS unless the public is given an opportunity to review and comment on the study and results.

ii. Methodology

The comments in this section question the appropriateness of using non-use values because of questions about how the values will be determined and whether or not the public will be allowed to participate. They question whether the conditions necessary to satisfy a credible study for economic analysis are possible until (1) physical and biological relationships are based upon indisputable scientific conclusions; (2) alternatives and associated impacts are clearly defined; and (3) non-use values are obtained through an unbiased survey of the affected population. Comments suggest that these conditions have not yet been met, and non-use values should not be presented without an opportunity for public review and comment. Some suggest that non-use value analysis should be a part of the AMP. Others present a variety of questions pertaining to the approach and methodology used.

6. Statements of Belief, Opinion, or Philosophy That Could or Should Influence Discussion and Decisions of this Process

Comments included in this category reflect feelings regarding a number of topics, including: (1) mankind's role in caring for and using the resources that are part of "nature"; (2) rivers, dams, and dam operation; (3) the EIS process (including priorities, outcomes, the government role and leadership, analysis, alternatives, and public participation); (4) expressions of support for or disagreement with statements made by other groups or organizations; and (5) specific word changes or corrections to the document. Comments included in categories (2) and (3) may overlap somewhat with comments in chapters one and two of the PCS, but those discussed here are more general and philosophical in nature (matters of opinion) and those discussed earlier are more specific. An example of such a statement of opinion is the comment that does not fit into the above categories: "I am 100% in favor of Indians." The author wants this personal belief to be noted and considered by those involved in the decision-making process. The comments summarized in section six are of this nature.

a. Beliefs About Nature and Mankind's Relationship to Nature

i. Technology

Commentors express two opposing opinions concerning technology. The first is that technology kills nature and thereby kills people. The second is that everyone wants to use the things that modern technology has produced.

ii. Grand Canyon and Glen Canyon

These comments show agreement that Grand Canyon is a special place that needs to be protected, saved, or restored. Commentors refer to Grand Canyon as a treasure, a wonder of the world, and a place of great importance. Many people note that damaging the canyon in the name of progress, so that utilities can make a profit or for peak power production should not be allowed. Some say that hydropower is not one of the purposes of GCNP as identified in the NPS Organic Act. Not everyone agrees, however, that fluctuating flows or erosion cause damage to the canyon. Some feel this is the "natural" course for the canyon, or that change in the canyon is part of the natural scheme, that the small picture we observe today and on which we base judgements is minor in the total scheme of Grand Canyon history. While some advocate a Grand Canyon as close to the "natural" or "created" state as possible, others note that we cannot go back to a time when mankind's influence can be erased in the canyon.

Grand Canyon cannot go back; it will always be changing.

The comments contain some specific suggestions for caring for the canyon. They include using science, educating the public about conservation and encouraging it, not managing it as a zoo (diversity), leaving the canyon alone, and returning the river to a pre-dam state and eventually a free flow. One commentor declares that the cost of saving the canyon should be borne by everyone, not just the rural west. Members of the public also mourn the tragic loss of Glen Canyon when the dam was built, because people will never see the natural beauty that was there. Others maintain that future generations should be able to enjoy Grand Canyon.

iii. Living in the Southwest

Commentors suggest that living in regions where resources are scarce demands sacrifices from those who live there. This is an individual choice and not something that society as a whole, wildlife, or geologic environments should pay for. The cost of protecting wildlife and the Colorado River is viewed in another comment as a way to incorporate into the regional economy the true costs of living in the southwest.

iv. Mankind's Use of Resources

The theme of one group of comments is that mankind must learn to live with nature, not at nature's expense. Another group suggests that mankind has been given dominion over the earth. Agreeing that man has dominion, a third group suggests that dominion includes wise use of resources. This is representative of the range of comments is this area. Some say that zero impact could be achieved only if man ceased to exist, while others feel we must give up certain things now to have an enjoyable place to live in the future (subsidizing surplus crops is one example cited). Finding a workable balance between mankind's needs and protecting nature is possible, according to others. One person advocates a "holistic" approach to solving these problems.

b. Beliefs About Rivers, Dams, and Dam Operation

i. Rivers

Most commentors simply referred to "the river." From the context, Reclamation assumes that such references intend the Colorado River. On the other hand, some simply refer to rivers in general. For example, rivers are valuable, writes one commentor, and should not be dominated by a single use. Another expresses concern over perceived misuse and destruction of our national river system. Once there is a dam, there is no way to restore a river, declares another. A similar comment states that the destruction of the Colorado River is one of the biggest mistakes Reclamation has ever made. Several commentors focus on management of the river. Some say that the river would always be subject to active management (could not be treated as wilderness), while others request that the river system be managed as a whole rather than as a series of reservoirs and generation facilities. Money should not dictate management of the river, according to one person. Another suggests that managing the river to benefit the ecosystem will be good for the utilities because it will prevent future losses due to environmental crisis. Again, commentors express the idea that the river (like the canyon) is constantly changing and whether those changes are good or bad may be a matter of perspective. Rounding out the description of the range of comments in this section, one comment reads, "Everyone has a better use for the Colorado River than the one God intended."

ii. Dams

Some of the commentors generally favor dams while others do not. Naturally, those favoring dams would like to see more built, while those opposing dams feel that GCD has hurt more than it has helped and should not have been built. Others refer to the positive benefits that have come to the ecosystem and to millions of people because of the dam. Another group of comments reflects a hope that this process will lead to improved management of other dams as well. The subject of some comments is pre-dam

conditions and a possible return to them. Most of these indicate that a return to pre-dam conditions is not realistic and that pre-dam conditions were not pristine, were typical of a flashy river system, an had some ecological problems, too. The existence of the dam, one commentor notes, has changed the whole ecological system of the river. Another suggests that nature will adjust to the changes the dam has brought if mankind's influence and presence are minimized. The fact that these changes are viewed with mixed reactions is evident in comments that say they are good (more recreational use, etc.), others that say they are bad, and still others that say some are good and some are bad. Commentors encourage public involvement in the management of the Colorado River resources, including the GCD. Two other comments are further indications of the lack of consensus regarding dams: one states that there is enough water inventory to manage the river system for the net benefit of all users, while the other states that we cannot afford to build the dams that are needed.

iii. Dam Operation

The most frequently mentioned idea concerning dam operation is that science, rather than politics, should control the flows through the dam, and a few special interest groups should not dictate dam operation. Many comments focus on the question of what should take first priority in determining dam operation, for instance: (1) electric generation at GCD has taken precedence over the health of the Grand Canyon; (2) in the past the dam was operated to maximize a single resource, but in the future only holistic, ecosystem-wide management can balance concerns; (3) limiting power is a breach of public trust; (4) operation of the dam should not be predicated purely on economics; and (5) Reclamation should operate the dam to meet the objective of the NPS Organic Act. One comment addresses the question of who should set the priorities in stating that the NPS should control operations at the dam. Some see the proposed changes as beneficial, while others urge postponing changes until factors like increased coal burning and increased cost of power are taken into account. A few commentors assert that past dam operations have caused much damage or that the flows through the dam should be as consistent as possible. Another suggests annual adjustment to conditions. Operation of the dam more like a beaver dam is recommended for consideration. One commentor wishes to receive a partial refund of the money that has gone to pay for the generating facilities and the dam if they are not to be used to their maximum.

c. Beliefs About the EIS Process

Many commentors express strong feelings about this process and its outcome. Some are concerned that more consideration be given to one or more priorities or to positions they favor, while others complain that there may be a bias that will prevent consideration of what may have been the "best" decision. Many also express opinions about the role that the government in general and various government entities have played in the process.

i. Priorities and Objectives

Environmental protection and responsibility are priorities for people who applaud Reclamation for its efforts along those lines, say pre-dam conditions should be the goal, and advocate a return to a healthy ecosystem and a reasonable workable solution for all parties. Others issue a strong call to ignore political pressure and let "true" or "best" science (which they claim is now available) determine how to reach a balanced result. On the other hand, some suggest that we do not yet have enough scientific knowledge to determine what the best management policy should be, or that the science is being ignored. People or majority opinion should be the first priority, according to those who say that public officials should always base their decisions on good information and what is best for the majority (the 95% who represent reasonable thought and common sense), and also for those who want to know if fish were more important than people or if the rights of the few displace the rights of the many. Some also express concern that we may be sacrificing our

global competitiveness or trading economic regress for progress. Some Utah residents feel that their views should receive some preference because the Colorado and Green Rivers flow through their state. These comments reflect the public concern for the "wise" establishment of priorities and objectives.

ii. Bias

The public perceives bias in three major areas. In the first area, commentors feel that perception, rather than science, is driving the final decision. In the second, someone alleges that Reclamation purposefully misrepresented the stand of the FWS on the SASFA and the Run-of-the-River eliminated alternative. But the most frequently mentioned bias is the idea that environmentalists are pushing the EIS process for selfish purposes. Related to this are the suggestions that: (1) perhaps the private business in the canyon has been emphasized, and (2) the assumption has been made that what is good for recreation is good for the environment and what is good for power is bad for the environment.

iii. Outcome and Decisions (Record of Decision)

Opinions regarding the outcome of this process range from statements of optimism or pessimism to indications of what the outcome should be. Some comments express the belief that the highest professional standard should be used in completing the EIS, while others compliment Reclamation's priorities and favor sticking to the current proposal unless science indicates a change is needed in the future. Others state categorically that there is no honesty or that EISs always prove that the proposed projects are safe. Those skeptical of the outcome say that (1) it is a short-term solution to a long-term problem; (2) special interests have or will get in the way of what is best for the region; (3) the losers lose more than the winners gain; (4) FWS's manipulation of the outcome is disappointing; and (5) that the Southwest Indian Tribes should sue to block the proposed changes. Commentors note that several things need further consideration or should be removed from consideration before the ROD. These are: (1) do not be limited to today's solutions, but look to the future possibilities; (2) provide detailed direction as to how the ecological elements of the Grand Canyon can be restored and protected in the future; (3) the solutions for problems at GCD should not move the problem on to other locations; (4) the EIS should state clearly that it is not a long-term resource management plan and should identify those parts of such a plan that are outside the scope of this EIS; and (5) no significant future experiments such as flooding riparian habitat or radical changes in water releases should be decided now (most frequently mentioned). One commentor suggests that decisions should be based on achieving the greatest benefit. Another questions whether the decisions made in this process will teach youth that money is the most important thing or that other things like nature have value as well. One person asserts that a good outcome for the EIS would be for the Grand Canyon to become a "Mecca" for endangered fish.

iv. Government Role and Leadership

Many commentors in this group feel that the government agencies have done a good job with this EIS, have made good use of science, are being environmentally responsible, and have made good suggestions. Others feel that (1) the process has been a waste of taxpayer money; (2) the government should not be involved; (3) special interests are being catered to; (4) the agencies (Reclamation in particular) are ignoring science, showing a lack of concern for the environment, and are out of touch with the people; and (5) FWS is cheating to advance its own purposes.

In addition, several comments express opinions concerning legal mandates. One states that the GCPA passed because the American public demanded protection of Grand Canyon and downstream resources. Another says that the preservationist values of that act and the NPS Organic Act are being compromised for consumptive interests.

One commentor says that the new national majority should not seek to circumvent existing law, but should follow due process; another says that the Law of the River can be changed if necessary. Commentors predict rebellion against the impact of the ESA and request some relief from that act. They also praise the cooperative nature of this effort, even if the public had to exert pressure to bring it about (as one person suggests). Members of the public also suggest further study by all interested parties, but request separation of public and private entities. They also caution federal agencies not to ignore their public-sector advisors.

v. Analysis

The central theme of this section is caution that the scientific and economic information contained in the DEIS be trustworthy and professionally interpreted. Some suggest that this goal may have been met and others assert that it has not. One commentor says that we have the science to reduce adverse impacts without unreasonable loss of power benefits, but others caution that there is no such thing as good, bad, or neutral science; rather, it is all a matter of how it is used and by whom. Even if we do not have scientific "proof" that resources will improve, we should do our best to solve the problems, according to one statement. On the other hand, the FEIS should not rest on assumptions. Rather, says another, facts should be stated and unknowns acknowledged, and research should be focused on missing facts. Commentors criticize the DEIS for not including analysis of whether subsidizing power and water for the development of the desert is a good thing, and for not making better use of independent university researchers.

vi. Alternatives

Commentors register support for various alternatives here. Two members of the public voice general support for the alternative that best benefits the Colorado River ecosystem and the cultural resources of Grand Canyon, or the one that best replicates the natural flow of the river. A third says that the best alternative is the one that serves the greatest number of people. Two other commentors favor the MLFFA, saying either that it is critical to the ecosystem, or that it reduces adverse impacts on the downstream environment and cultural resources.

vii. Public Participation

Comments here express the sentiment that the use of the EIS process is a manifestation of the success of GCD operations (in creating a good life for people), because hungry people and those struggling to make a living could not have taken the time (and would not have been sufficiently concerned) to participate.

d. Expressions About Comments Made by Others

The specific comments summarized here may be found on pp. 188–90 of Appendix 1. All of the comments in this category state support for comments, opposition to comments, or no comment. Individuals and groups register their opinions for or against comments that were made during the public hearings or in written comments by other individuals and organizations. Some people agree with the same organization that drew disagreement from others. Many of these comments appear in letters with very similar content.

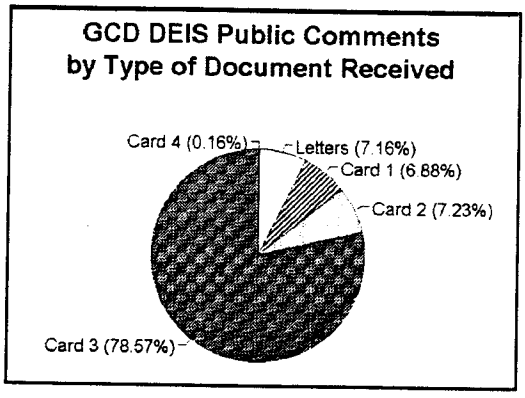
e. Suggested Word Changes and Corrections

A number of commentors request specific word changes or corrections referenced to a particular page in the document. These suggestions are grouped together in the comment summary to facilitate consideration by those revising the DEIS. The content of the suggestions is substantially the same as other suggestions previously discussed and so will not be summarized here. All comments of this type appear in the comment summary on pp. 190–95 of Appendix 1.

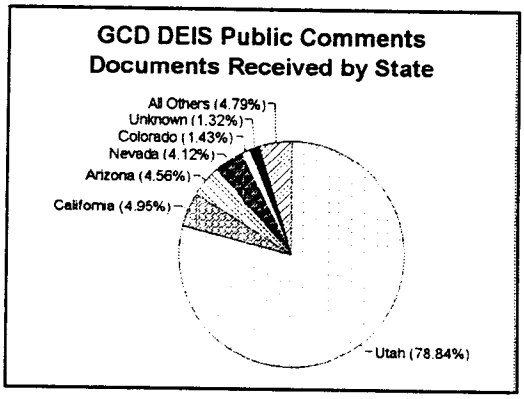
CHAPTER FOUR
Statistical Analysis and Conclusions of the Consultants

1. Statistical Analysis of the Public Comments

During the public comment period, Reclamation received 33,298 statements from individuals, groups, and organizations. More specifically, Reclamation received 136 oral statements at the public hearings, 2351 letters from individuals, groups, and organizations, and 30,812 pre-printed cards. Reclamation also received some form letters that were pre-printed, like the cards, but signed by small numbers of individuals. Because the letters arrived at Reclamation throughout the public comment period and because of the small numbers involved, Reclamation did not attempt to keep track of these multiple-signature letters separately from the other letters.



The pre-printed cards Reclamation received were distributed by various organizations and utilities to their constituents with a request that they sign and mail them to the Colorado River Studies Office. Although signed by more than 30,000 individuals, these cards, representing the overwhelming majority of the comments received, originated from only four sources. For reference and identification purposes, Reclamation has labeled the four cards numerically (e.g., card number one, card number two, etc.). Some 2518 people signed and mailed card number one, which was distributed by an organization called Friends of the River. Card number two originated with the Colorado River Energy Distributors Association (CREDA), and was signed and mailed by 2638 people. Card number three, which far outnumbered all other cards with a total count of 25,594, originated with various local utility groups (members of the Intermountain Consumer Power Association) and was mailed in by their constituents. Several people who received this mailing from their utility mailed the card, but crossed out its text and included a letter expressing their own views on the issues addressed in the DEIS. These comments were treated as letters rather than as cards. Card number four, whose origin is unclear, appeared 62 times and expressed concern for the humpback chub. The complete text of each of the four cards appears on pp. 229–30 of Appendix 5.



Reclamation recorded the names and addresses of all commentors in the database. An alphabetical listing of the names begins on p. 231 of Appendix 5. This list may contain some inaccuracies due to difficulties in reading some of the handwritten names and addresses. Furthermore, some letters arrived without a full name and address. Despite the difficulty in identifying the authors of these comments, however, the comments' contents were summarized carefully and included in the counts. The list of names is published here to show the high level of public interest that the

DEIS generated and to acknowledge the number of individuals who took the time to comment. Please note that the list identifies the name of an organization or business only if no individual name was given. A list of the major organizations that submitted statements appears on p. 223 of Appendix 5.

Reclamation received comments from individuals, organizations, and groups located in all fifty states, the District of Columbia, Canada, Japan, France, and the Virgin Islands. The level of public interest is greatest in the western United States; the largest number of comments came from Utah, where 26,147 of the documents originated. Californians sent in 1641 comments, Arizonans 1511, and Nevadans 1365. Reclamation also received 473 comments from Colorado, and 149 from New Mexico. When letters are separated from cards, a slightly smaller percentage originated in the 11 western states. Ninety percent of the cards came from the western states, while 84% of letters came from those states. Statements are tabulated and organized by state of origin and by type of document in Appendix 5. The breakdown for comments given at the public hearings appears in Appendix 4.

A number of cities, towns, counties, municipalities, elected officials, state and federal agencies, power generation and distribution entities, water distribution entities, Indian Tribes and other organizations responded to the DEIS. A complete alphabetical list of the names of all of the groups mentioned above who sent in letters, gave oral testimony or both appears in Appendix 2. This report will refer to statements received from these groups as organization comments. Some 167 organizations submitted comments during the public comment period in letters and public hearing statements. Businesses and organizations who sent in cards are not included in the long list of individuals at the end of Appendix 5. Reclamation received comments from 13 cities, towns, counties and municipalities, 24 elected officials, 26 state and federal agencies, 43 power generation and distribution entities, 17 water distribution entities, one water and power association, 5 Indian Tribes, and 38 other organizations. The 24 elected officials included one Congressman, one Governor, one state senator, and other locally elected officials of towns, cities and municipalities. In general, the comments submitted by the organizations were the most detailed and technical.

The frequency with which any particular idea or subject appears in the public comments can be determined by looking at the reprint of the entire PCS in Appendix 1. To the left of each comment is a column showing the number of times that comment appears in letters, cards, or oral statements. This number should not be confused with the number in parentheses, which is the database identification number for the comment. The number of times that each major subject category appears in statements is listed next to the outline heading for that section of the PCS. While the frequencies are interesting, this is not a voting process, but rather an attempt to gather substantive reviews of the DEIS. Some of the most specific and technical statements are made only once, while more general comments may appear many times. Therefore, the number of times a comment appears may not correlate to its importance in terms of reviewing the EIS process and documents. Nevertheless, the topics that appear most often during the public comment period are an indication of the parts of the DEIS that generated the greatest interest and opinion.

Comments address dam operation and power generation in particular more than 126,000 times. This issue received the most attention. Nearly 60,000 of these are statements of beliefs about rivers, dams, and dam operations. Another 65,000 are statements about hydropower, and 1000 are more specific comments on dam operation that provide background for discussing the alternatives. Many of these comments come from cards two and three, but a high level of interest in these issues is also represented in the letters and oral comments.

Comments mention the MLFFA, identified in the DEIS as the preferred alternative, more than 14,000 times. Some of these comments support the preferred alternative, some oppose it, and some request further clarification of the alternative. A summary of the issues covered in this section and all other sections of the PCS can be found in Chapter 3 of this report. Again, the frequency with which any particular idea was mentioned appears in the PCS, Appendix 1. Reclamation recorded another 6000 statements about the other alternatives, with the majority of those (5800) addressing the ILFFA.

Beliefs and specific comments about the EIS process and its adequacy generated more than 11,000 comments. Nearly 5000 of these fall in the "Statements of belief, opinion, or philosophy" category, and 6000 in the more specific "process adequacy" category. The 8600 statements about the AMP and Long-term Monitoring and Research indicate that this was another one of the areas generating considerable interest and concern. Resources other than hydropower were mentioned 2300 times, with endangered species issues receiving the most comments (1800).

Many opinions, beliefs, questions, concerns, and preferences are reflected in the more than 174,000 issue statements recorded during the public comment period. This indicates a high level of public interest in the outcome of the EIS process. While many opposing views are expressed and varying levels of involvement in and understanding of the issues are reflected in the comments, the wide range of ideas should provide considerable food for thought for those who will finalize the EIS and make decisions on the future operations of GCD.

2. Consultant Conclusions About Public Comment

In assisting with the public involvement aspects of the Operation of Glen Canyon Dam EIS, the Bear West Consulting Team has analyzed more than 33,000 written comments and attended all of the public hearings. This experience has provided the Bear West Consulting Team with some observations and insights into the level and content of the public interest in this EIS and the NEPA process. This section presents some of the consultants' observations, and summarizes a few conclusions drawn by the consultants who evaluated the public comments and the process. **These observations and conclusions reflect the consulting team's views and should not be interpreted as reflecting the opinions of Reclamation or anyone else.**

a. Number and Substance of Comments

The 33,000 documents received by Reclamation in response to the Operation of Glen Canyon Dam DEIS is impressive. The total number of comments is almost double the number received during the scoping phase of this EIS. It is clear to the consultants that Reclamation was effective in informing the potentially interested members of the public about the EIS, and in giving ample opportunity for public comment. The public displays an intense interest—from various perspectives—in the operation of Glen Canyon Dam.

Strong public interest in the resources affected and the outcome of the process is also reflected in the content of comments. Unlike the more general comments received during scoping, the lengthier responses to the DEIS show tremendous diversity and detail. In analyzing and summarizing the comments, the consulting team has identified nearly 2,500 distinct substantive points made by the commenting public. The consulting team has been impressed that the commenting public accepted NEPA processes as a basis for governmental decisionmaking and understood the role and process for an EIS.

The level of information about the process and DEIS for most of the commentors is fairly basic and the majority of the documents contain statements that are general in nature. Most of the commentors seem to base their remarks on information gleaned from the media or from information distributed by organizations to

which they belong or of whom they are customers, or both.

The exceptions to these more general comments are the large organizations, individuals with scientific backgrounds, and some who have obviously taken the time to read the entire DEIS distributed by Reclamation. The comments made by these people often refer to specific sections of the DEIS or to specific ideas or information contained in the documents.

The consultants note that the themes expressed by various interests are consistent between the oral comments at the public hearings and the written comments. This consistency reflects the degree to which commentors are prepared to comment and have adequately followed the EIS process.

b. Form Cards

Most of the documents received on the DEIS were pre-printed cards distributed by organizations who suggested that the card be signed and mailed to Reclamation. All cards contained generalities and a concern that the operation of the dam could have a dramatic impact on the life of the commentor. Most of the cards originated with electric power utilities and their organizations, and were mailed from Utah. These cards contain from four to seven general comments.

The card received in greatest number indicates significant concern on the part of public power consumers about increases in power rates. Some letters sent in response to the public power mailings expressed genuine fear. A number of commentors were older, retired individuals in small communities who felt that the increases in rates would make it difficult if not impossible for them to pay their power bills and heat their homes in the winter. Whether the projected cost impacts are overstated or understated in the mailings and in the DEIS itself, the effect this process will have on power rates for consumers is a major public concern.

The consultants believe it would be helpful for the FEIS to clarify the extent to which changes in dam operations would be likely to impact power users. The organizations who have distributed information on economic impacts could also clarify those impacts to their constituents and customers.

c. Shifting Source of Comments

From an overview of all the comments, the greatest response has come from those who fear that changes in Glen Canyon Dam operations will adversely affect their interests. It appears that those who viewed the DEIS as offering them substantial benefits were less likely to submit comments. This is a reversal of the source of comments received during scoping, where the majority of commentors expressed a strong concern for resource protection in the Grand Canyon. It is possible that the change in the source of comments reflects in part a belief that the resource protection issues that were raised with particular fervor during scoping received adequate attention in the DEIS.

d. "Special Interest" Groups

As during earlier stages of the EIS, a common statement made during this public comment period has been that special interest groups and politics should not dictate the outcome. Just which groups involved in this process are special interest groups and what constitutes political influence seems to depend on whether or not the person making the comment agrees with a particular group or idea. The comments do not appear to produce agreement on a decision model regarding the criteria that should guide decisionmaking or on just who should make the decisions.

e. Role of Science in Decisions

Another comment that appeared often in the cards and letters is that science should drive the decisions that will be made. This comment is made by many different groups and individuals who express concern about many different resources. Each of a variety of opposing interest groups appears to believe that science sup-

ports its position and discredits contrary views. Others contend that science offers no clear answer.

A great deal of time, effort, and money have been expended in an attempt to develop sound scientific support in this process. Despite this extensive effort, consensus on what science reveals appears lacking in public comments. There may be an unrealistic expectation on the extent to which basic public policy decisions can be based primarily on scientific evidence.

A question federal officials might consider is whether the years of research have significantly altered the way the dam management would have been changed. How does one know when the cost-benefit ratio of additional research and analysis indicates that enough has been done? When are decisions made on the basis of the best available information, and when does the agency conclude that such actions or decisions are sufficient until better and more substantial information becomes available that would warrant a change?

f. Controversy Over Endangered Species

The public has expressed considerable concern over the endangered species issues that impact this EIS, with particular interest focused on the humpback chub. Some power consumers are disturbed that their rates would increase in order to benefit a few fish that some consider trash fish. Many of these commentors feel that people should be given priority over fish. Others feel that this one resource is unduly influencing a system that is made up of so many other parts. Some of the things that might be good for the endangered fish would be harmful to other resources. In these cases, people are not certain they want to see the endangered species be given first priority. Many wish to know at what cost these fish would be saved, or if it is even possible to save the fish by the changes being proposed.

Another group of comments believes that the Endangered Species Act grants endangered species a first priority position, and members of this group fully support this status. From their point of view, none of the changes being made to help these species are too costly or require too great a sacrifice from users of other resources. This group supports the suggested flow changes, multi-level intake structures to raise the temperature of the water, and any other changes scientists feel will aid in the recovery of endangered fish.

Commentors also mentioned conflicting interests of one endangered species with another endangered species as a problem. Other commentors note a possible conflict between the sport fishery and endangered species protection, with biases for one or the other. Science was questioned from all sides. The combination of competing interests, perspectives, and parallel Endangered Species Act decisionmaking make this issue particularly thorny.

g. Support for the Adaptive Management Program

Comments from all sides support the concept of adaptive management of the resources under consideration. Many favor the flexibility of the AMP because of the dynamic nature of the system and because of the possibility that further scientific study and experience may warrant additional changes. Some of this support seems to be linked with the hope that while current scientific findings cannot support a particular stance, future studies will provide the information necessary to do so. Those who favor and those who resist more restrictions on the flow of water through the dam both seem to be hoping that adaptive management will lead to future changes in their direction. The expectations for the outcome of adaptive management, however, are likewise rooted in a desire to organize and manage the AMP to further the particular interests at stake. The comments on who should manage the AMP and how it should be organized reflect both distrust in some entities and a desire to shape the AMP program toward a desired set of outcomes.

h. Detailed Comments and the Benefit to Decisionmakers of Extensive Research

The most lengthy and technical comments have come from large organizations and federal and state agencies, some of whom are cooperators in the process. The comments submitted by these entities contain questions about the data presented in the DEIS and the interpretation of that data. Many of these comments appear to suggest that the conclusions in the DEIS could be questioned. While many of these comments probably reflect a sincere desire to see additional information on certain subjects, others suggest lengthy and costly reworking of the research and data analysis that would probably not significantly change policy recommendations but simply slow the process.

i. Varying Support for Congressional Policies and Acceptance of Compromise in the Final Decision

Given the pluralistic nature of the laws passed by the Congress and the history of resource management policy, opinions will always differ on which laws, traditions, history, policies, or interests should guide decisions regarding change. Therefore, it is unlikely that any action or policy decision resulting from the Operation of Glen Canyon Dam EIS will be able to avoid controversy. Likewise, the issues raised by the DEIS and the changes being considered elicit very strongly held views that are expressed not only as opinions, available facts, and information, but also in attacks on the personal integrity and values of those who disagree. Nevertheless, the comments reflect a recognition that agencies must make decisions and implement changes. They also seem to accept that compromise and experimentation with alternatives will be the order of the day.

APPENDICES

OPERATION OF GLEN CANYON DAM
DRAFT ENVIRONMENTAL IMPACT STATEMENT

JANUARY 4 - APRIL 11, 1994

PREPARED BY BEAR WEST CONSULTING TEAM
FOR THE
COLORADO RIVER STUDIES OFFICE
BUREAU OF RECLAMATION
OCTOBER 1994

APPENDIX 1:

PUBLIC COMMENT SUMMARY

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INTRODUCTION

All of the individual comments extracted from the written and oral statements submitted about the DEIS are reprinted here. The comments have been grouped by subject using an outline format. Each comment includes its database identification number (I.D. Number) in parentheses ( ). The number of times each comment appeared during the comment period (Frequency) is indicated by the number to the left of the comment. This includes comments that appeared in any form, including comments submitted on a pre-printed card, in a letter, or as part of a statement made at a public hearing. In addition, the number of comments received about a particular subject (as identified by the first level in the outline) is listed next to the outline heading.

CHAPTER ONE
General Comments about the Adequacy of the Process and the Document

Frequency (I.D. Number) Comment

1. Process Adequacy - 6,326 statements dealt with this subject.

a. General

180 (0009) Appreciate the work that has been done, e.g., document, videos, hearings, etc.

16 (0012) Impressed with the process.

4 (0015) What is being done reflects my views on the project.

2 (1049) Efforts to date are disappointing;I urge major changes before issuing final statement.

b. Leadership

1 (1784) Concerned that Reclamation's self-serving logic will cause it to turn around in a few years and use the logic that since they never implemented a baseline flow that mimics pre-dam conditions with MLFF, it now makes no sense to consider selective withdrawal or sediment augmentation to mimic pre-dam conditions.

c. Cooperation

3 (0757) Grand Canyon Trust is committed to working to reach ROD that meets goals of Grand Canyon Protection Act.

3 (0764) Applaud Reclamation for including native American groups as equal partners in this process.

1 (0789) Hualapai tribe wants to continue to cooperate in this process.

1 (1976) pp. 9–10: It is the position of the Hopi Tribe that all Indian Tribes should be mentioned by name since they are sovereign political entities. All of the Tribes should be recognition equal to that afforded the states. Since all of the state Governors that are required to be consulted are specified, all of the Indian Tribes should also be specified.

1 (1694) p. 309: It may be appropriate to document if and when Reclamation invited Havasupai Tribe to participate as a cooperating agency and why the Tribe declined to participate.

1 (0978) DEIS should correctly reflect addition of Southern Paiute Consortium, Pueblo of Zuni, and the San Juan Southern Paiute as cooperating agencies.

1 (1646) p. 309: FWS continues to recommend that our draft FWCA report be incorporated into the DEIS as recommended 4: 13: 93.

Frequency (I.D. Number) Comment

1 (2085) p. 3: In January 1993, the Cooperating Agencies reached consensus on a Preferred Alternative: Modified Low Fluctuating Flow. FWS was the lone dissenting cooperating agency. Reclamation then requested that FWS prepare a biological opinion on the Preferred Alternative. Elements of the RPA contained in the biological opinion were incorporated into the MLFFA by Reclamation without agreement by the cooperating agencies. Reclamation has misrepresented the substance of the Preferred Alternative that was endorsed by a consensus of the cooperating agencies, including all of the participating Indian Tribes. A more extensive discussion of the role of the cooperators should be included in the EIS. This should include a discussion of how the Preferred Alternative was developed and what changes were subsequently made, including discussion of the biological opinion and RPA.

1 (1695) p. 309: Indicate the date of the draft biological opinion; will it be finalized prior to the ROD?

1 (1413) Not enough consideration has been given the seven states impacted by DEIS. Impacts to states and their citizens are not fully disclosed. The Secretary of Interior must consult with the governors of the Basin States and the Upper Colorado River Commission on these important issues.

d. Scope

2 (0720) Do not feel that the issues I raised in scoping were addressed in the DEIS.

12 (0504) Disappointed that little consideration was given to the need for growth.

92 (0800) DEIS fails to analyze non-operational impacts, including non-native species (exotic fish) impacts, temperature and sediment impacts, and human use impacts.

5 (0458) The process has been sidetracked by people's agendas not part of original study.

3 (1115) Methods used to restore downstream resources must not be limited to current operational measures. Increased flood frequency reduction measures, sediment augmentation, selective withdrawal system, entirely new flow regime, and: or other measures may prove necessary.

1 (0962) EIS scope was not fully inclusive of Tribal resources associated with Grand Canyon, such as Havasupai tributary fisheries. Data for these and wildlife and vegetation adjoining canyon along border of Hualapai Reservation should be considered and included in long-term monitoring and research.

1 (1270) Reclamation should expand EIS to encompass comprehensive resource management plan; shift question from how flows can be modified to how resources best managed; integrate operative and non-operative options.

Frequency (I.D. Number) Comment

e. Analysis

2 (1591) Various tables and descriptions of Preferred Alternative throughout document should be revised to include the impact analysis for the RPA (conditions) rather than just referencing a portion of the SASFA impacts.

1 (1897) Preferred Alternative and some of common elements have questionable merit, including substantiation of hypothesis that damage has occurred to environment, habitat, beaches, and ecosystem of Colorado River below Grand Canyon as result of dam operation.

2 (1592) Unfortunate that final reports from GCES endangered fish research were not available for use in preparation of the DEIS, FWS Coordination Act report, and biological opinion; draft versions were used instead.

93 (0799) All economic impacts (direct or indirect) of all alternatives need to be fully disclosed. DEIS does not.

1 (1829) EIS needs to place a dollar value on all resources: water stored and ecology supplanted, as well as electricity.

1 (1811) The loss and attrition of biological resources seems to elude the DEIS; unfair to place dollar value on electricity and none on ecology.

1 (1294) Costs of enhancing downstream environment must be commensurate with the costs actually needed to enhance those environments.

18 (0566) Comparison of economic impacts to power generation and recreation should be based on willingness to pay to enable comparison of compatible values.

1 (1895) While DEIS states recreational user-days in hundreds of thousands, it fails to mention that 3 million consumers use power 365 days per year, with potential 1.1 billion user-days per year.

1 (1731) Lack of sound financial data comparing increased costs to citizens and financial benefit to vocal tour operators and environmentalists gives EIS a spurious intent.

5 (0565) Present value benefit to recreation calculated at $50 million and present value negative effect to public power is $2.2 billion; these figures are not in DEIS.

1 (1969) DEIS does not consider the impact on the dam's operation of eliminating all subsidized electricity and water rates.

1 (1163) Focus of discussion during process would go between best alternative for humpback chub and cost of SASFA. Inaccurate economic data may have helped steer opinion of cooperating agencies away from science toward compromise with hydropower.

Frequency (I.D. Number) Comment

1 (1909) Characterization that DEIS represents "impact on national economy" is false, and misses mark by figure probably exceeding a billion dollars, to say nothing of the environmental costs.

f. Alternatives

1 (1555) p. 181 through Chapter 4: Issue statements ask how the various resource components are affected by "flows"; would be more correct to ask and answer how the various resource components are affected by "alternative operations."

2 (2023) pp. 167–303: Each resource section in this chapter includes a table that summarizes the effects of each alternative on that resource. None of the tables, however, includes the potential impacts of the endangered fish research flows of the Preferred Alternative. These flows are excluded from this table because too little data regarding their occurrence and possible consequences are presently available. This then becomes a meaningless presentation of the EIS's analysis. If the effects of the Preferred Alternative flows are not understood, why are they preferred?

2 (1275) Preferred Alternative should be based in science and achieve a balance among various resources. Tradeoffs should not be made unless identifiable benefits outweigh negative impacts.

2 (0873) Preferred Alternative is designed to enhance and preserve downstream environment, but some elements and some common to all alternatives have questionable merit.

1 (1446) p. 53: Statement that NPS, Navajos, and Hualapais favor wilderness conditions and find that fluctuating flows are consistent with their goals is illogical. Fluctuating flows are clearly less reflective of wilderness conditions than SASFA as pointed out on p. 144.

g. Public Comment

2849 (0309) The public is entitled to a thorough explanation of all proposals and their risks to Grand Canyon and other resources and a chance to comment.

2835 (0310) Public is entitled to comment on all significant actions. Current EIS and process lacks the necessary information and opportunity for comment on proposed experiments.

10 (0334) The public needs to have a chance to comment on all aspects of the DEIS, and cannot comment on those that are not adequately described.

12 (0807) DEIS and Preferred Alternative should be revised to fully and fairly analyze all issues not adequately discussed, and there should be an opportunity for public comment on revisions.

4 (0858) Public needs to know all the facts about this project; articles in newspapers are not enough.

1 (2320) An important issue like this would benefit by a longer time for response.

Frequency (I.D. Number) Comment

3 (0465) Needs to be a chance to give additional: revised comments before FEIS is issued.

1 (0561) It isn't fair that all the hearings were held in big cities. Come to the small towns and hear what they think.

1 (0732) None of the hearings were held in the Colorado River Basin, and that makes it hard for those who live on the banks of the Colorado River to attend.

1 (1089) Despite numerous written and oral requests, I have not received important biological documents from Reclamation and am not therefore as prepared to comment as I would like to be.

h. Legal Mandates That Influence the FEIS and ROD.

3 (0547) Hoped NEPA process would use science to evaluate impacts and ensure a right and proper decision.

90 (0801) Supplemental information is necessary before a decision can be made by Secretary of Interior because of deficiencies in DEIS.

1 (2110) pp. 167–303: The principal purpose of an EIS is to disclose the potential impacts of project alternatives to allow decision makers and the public to understand the ramifications of one course of action in comparison to another. Chapter IV is where impacts are to be described and it is, therefore, the most important section of the document with respect to compliance with the letter and spirit of NEPA. However, the description of impacts associated with the Preferred Alternative is incomplete because the impacts of endangered fish research flows are not adequately described, and therefore cannot be adequately addressed. The effect of not adequately describing the impacts of the Preferred Alternative or even describing them commensurate with the other alternatives, renders the document as written out of compliance with NEPA. This situation must be corrected in the FEIS by either deleting the endangered fish research flows from the Preferred Alternative, the preferred response, or adequately defining the endangered fish research program and assessing the associated impacts.

1 (0059) NEPA demands study of no action alternative.

1 (0553) Endangered Species Act has overturned NEPA; no study of no-action alternative.

5 (0376) The preferred alternative fails to satisfy NEPA requirements because it does not adequately consider economic impacts.

1 (1047) DEIS contains inadequate economic analysis to comply with NEPA.

10 (0381) The DEIS is an inadequate foundation for the audit required by Grand Canyon Protection Act of 1992. This is a violation of NEPA. The DEIS should be revised to provide missing information.

Frequency (I.D. Number) Comment

7 (0809) If the Secretary proceeds without a meaningful audit, any criteria and operating plans adopted will be unlawful.

1 (0741) NEPA process requires that economic analysis be given equal weight with environmental analysis.

1 (0577) Reclamation has not addressed in a timely and complete manner the directives of the Grand Canyon Protection Act.

1 (1395) Section 1809 of Grand Canyon Protection Act mandates identification of economically and technically feasible methods of replacing power generation lost through changes within two years. DEIS identifies seven approaches, but the impacts and evaluation of these should be in FEIS rather than deferring until release of Secretary of Energy's report.

6 (0744) FEIS must meet the mandate of Grand Canyon Protection Act to operate Glen Canyon Dam "to mitigate adverse impacts to, improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including but not limited to the natural cultural resources and visitor use."

1 (1391) Measures called for in Section 1804 of Grand Canyon Protection Act should alleviate some of adverse impacts of Glen Canyon Dam changes. Must be undertaken in consultation with the seven basin states and other interested parties as required by the Act.

3 (0586) Preferred Alternative must recognize and comply with the Law of the River including delivery obligations.

1 (0822) FEIS should comply with Grand Canyon Protection Act and Clean Water Act and give a high priority to Endangered Species Act.

1 (1722) Future operation objectives of DEIS do not correlate with purposes of Endangered Species Act and NPS ideals.

1 (1689) Secretarial Order 3175 dated 11: 8: 93 should be included in Purpose and Need for Action to clarify Indian trust issues and responsibilities.

1 (2086) p. 8: The Navajo Nation would argue that the reserved rights doctrine as articulated in Winters v. United States, 201 U.S. 564 (1908) is as much a part of the "Law of the River" as any of the compacts or statutes cited. Moreover, Arizona v. California, 373 U.S. 546 (1933), cited as support for the correlative rights of the states, also affirms the Winters case with respect to the water rights of the five tribes on the Colorado River below Lake Mead. The provisions of the compacts are not intended to affect the water rights of Native American Tribes nor the federal government's trust responsibility.

1 (2124) DEIS represents a significant breach of the trust responsibility owed to the Navajo Nation.

1 (0998) pp. 50–51: Department of the Interior does not believe that the Hualapai Tribe has any management responsibility below the pre-dam high water level that existed in 1934 from

Frequency (I.D. Number) Comment

National Canyon to Lake Mead and holds the position that the Navajo Nation boundary below Glen Canyon Dam, particularly from Navajo Bridge to the Little Colorado confluence, is located 1/4 mile east of the east or south bank of the Colorado River.

1 (0996) p. 47: In the discussion of existing legislation, it would be appropriate to include the language from the 1992 Energy Policy Act of 1992, Section 2402, Dams in National Park System Units (p. 47).

2. Document Adequacy - 37 statements dealt with this subject.

a. Tone

1 (1663) The document either needs to be brought down to a level for the lay public or raised to the level of a scientific treatment. Chapter 2 is very readable but makes statements without scientific attribution. Chapters 3 and 4 are much less readable for general public and provide scientific citations though not at the level desired by scientists.

1 (1745) DEIS as it stands now is full of subliminal bias.

1 (1656) Document over-emphasized the negatives of some alternatives or features of alternatives, while de-emphasizing some of potential benefits. For example, while benefits of reduced fluctuations were listed, negative aspects of such flows received too much attention. Negatives of selective withdrawal were listed, but only obtuse mention of why it would be desirable. Nowhere is there a concise paragraph detailing how it would benefit native fish reproduction or why same is important for enhancement and recovery. Pessimistic tone seems like justification for avoiding operational changes.

b. Content

1 (1684) Important that the facts are stated and the issues thoroughly addressed in the EIS.

1 (2314) Reviewed DEIS for potential adverse impacts on human health, and believe related issues have been adequately addressed in DEIS.

1 (1824) Abandon euphemisms like "naturalized system" and substitute a more acceptable term like "ecocomplex," defining differences in the EIS between ecosystem and ecocomplex.

1 (1758) DEIS does not include entirety of FWCA report, as recommended by FWS.

1 (1939) Expand GLOSSARY section to include additional technical and subjective terms such as: Adaptive Management, resources, riparian zone, etc.

1 (1655) Summary pp. 58–59: The sections on Relationship between Short–term Uses and Long-term Productivity and Irreversible and Irretrievable Commitments of Resources are not included in the summary. We believe that the sections on Cumulative Impacts and Unavoidable Adverse Impacts are lightly treated. The EIS team needs to strengthen each of these areas.

Frequency (I.D. Number) Comment

1 (1523) Summary p. 59: "UNAVOIDABLE ADVERSE IMPACTS": This section should be expanded to address the unavoidable conflicts and trade-offs among resources in Glen and Grand Canyons. Changes in dam operations do not result in a win-win situation. While individual resource gains and losses have been covered in the preceding sections, a summary of resource conflicts and resolutions should be included here so reader clearly understands the situation.

1 (0981) p. 12: Agency concerns in the "Significant Issues Identified for Detailed Analysis" section should be clearly identified in a more detailed fashion rather than listed as part of public concern.

1 (1442) p. 50: Summary comparison of alternatives on p. 50 state MFFA and MLFFA are similar in environmental consequences to SASFA. This is at variance with information elsewhere in DEIS, such as Table II-7 which shows substantial differences between SASFA and all fluctuating flow regimes.

1 (1329) p. 51: Section on resource management objectives biased toward three alternatives without support for why they are singled out. In some instances another alternative would be more beneficial to a particular resource.

1 (1003) p. 63: Corrections to p. 63 to include "Access to the river is also available from Supai via a hiking trail to the river through the Havasupai Reservation and from Peach Springs..."; Flagstaff is 80 road miles from the South Rim; and the opening sentence of first paragraph following first correction is awkward and should be rewritten.

2 (1330) p. 66: Pre-dam hydrography deserves more attention than is provided in this discussion. Consistent pattern provided predictable environmental cue for plants and animals. Loss of predictable hydrological pattern should be noted.

1 (2303) B-30 to 35: Exceedance frequency displayed in daily graphs show differences in slope from month-to-month. Presume this translates to more consistency from day-to-day in flows in fall and winter months and less consistency in spring and summer. FWS has suggested support for the Steady Flow Alternative, which would have steady summer flows, ostensibly to mimic natural hydrography under which endangered fish evolved. If graphs display natural hydrography, then appears spring: summer period was historically not very steady. Flows from day-to-day were likely to be more unpredictable than during fall: winter period. Spring: summer period typified by a high peak followed by a rapid decline to base flow by September. Questions come to mind: 1) Why does SASFA suggest a stair-step decline in flows when doesn't match graphs? and 2) Why do minimum and maximum flows in SASFA not differ by two orders of magnitude similar to natural hydrography? If a natural hydrography is used by fish as cues to stimulate spawning runs, why does the mainstem population of Humpback chub above the Little Colorado River move into Little Colorado River simultaneous with those below Little Colorado River when only population below Little Colorado River has a "natural" hydrography cue? We conclude from mainstem population above Little Colorado River that hydrography cues are not needed. (CREDA)

1 (1645) pp. 303–305: The sections on Cumulative Impacts, Relationship between Short-term Uses and Long-term Productivity, Unavoidable Adverse Impacts, ad Irreversible and

Frequency (I.D. Number) Comment

Irretrievable Commitments of Resources are discussed only peripherally and not in the detail expected of an EIS of this consequence. Should be more complete in FEIS. (FWS)

2 (1303) Summary pp. 26–27: Eliminate problems, like tables on pp. 26–27 are reversed.

1 (2307) Tables of release rates were reversed in the summary for the SASFA and another of the steady flow alternatives.

1 (1987) pp. 54–55: Suggest developing a graphic representation of the relative impacts, which would make the EIS significantly more understandable and relevant to the public. Perhaps the creation of an abbreviated version of Table II.7, in which range of color-coded values, perhaps three, would be assigned to the resources under each alternative. For example, red might represent the greatest adverse impact; yellow, intermediate impact; and blue, favorable impact. The amount of each color in an alternative's column would be a quick, subjective measure of its impact, and would facilitate making comparisons among the alternatives. Perhaps this specific example would be inappropriate, but a graphic rendering of some sort should be possible.

1 (1997) pp. 56–57: This table would be more effective if it indicated what was being evaluated (i.e., number of individuals, extent of range, habitat, etc.).

1 (1447) pp. 58–61: Figures in this table on recreation, power resources, and wholesale and retail power rates are flawed because of errors in Chapter V.

2 (1306) Summary pp. 33: Diagram on p. 33 is flawed. Suggests high connectivity between sediment and natural, cultural, and recreational resources, but none between water and these resources. Fortunately text does.

1 (1975) p. 4: Since the Hopi Tribe is mentioned in the preceding text, the Hopi Reservation should be identified on this map. At least part of the Hopi Indian Reservation should occur in the area immediately to the east of the "Navajo Indian Reservation" label on the figure as it is drafted. Please include the Hopi Reservation on the final version.

c. Format and Layout

1 (1300) Inclusion of a summary document is good way to present the information to different audiences. Make sure summary is consistent with EIS. (AZ Game & Fish)

1 (1979) Preliminary pp. : The FEIS should have a title page that presents the title, subtitle, publisher, place of publication, and year. The title page should also be unnumbered and placed before the table of contents. Without it, the publication lacks a clear beginning point. The cover does not fulfill this function in an EIS anymore that it does in any other publication.

1 (1981) p. 1: Statement of Purpose and Need Comment: The statement of purpose and need should be highlighted. The draft EIS Summary focuses attention of the statements of purpose and need by presenting them as clearly labeled, stand alone paragraphs. This was a happy

Frequency (I.D. Number) Comment

accident of the summary's overall format, but is effective enough to suggest that something similar be done here.

1 (1662) Sometimes extremely important points appear deep in the back layers when it should have been treated in the Affected Environment or earlier sections. For example, information on selective withdrawal benefits, and effects of destabilized backwaters on humpback chub, razorback sucker, and flannelmouth sucker.

1 (1896) DEIS needs to be rewritten in scientific hypotheses: proof form so decision maker(s) won't reach erroneous conclusions.

1 (0980) p. 8: Dates and public law or U.S. Code notation is inconsistent in "Authorities and Institutional Constraints" section.

1 (1692) p. 40: We suggest that if the Indian Tribes or State of Arizona require permits for activities within the Glen and Grand Canyon reaches of the Colorado River, then it should be stated in this section of DEIS. Examples of permits mentioned in other parts of DEIS are pp. 63–64, p. 142, and pp. 153–155.

1 (1980) General Map: Part of the Hopi Indian Reservation is located right where the map title occurs. The Hopi Tribe requests that the map title be placed inside a box to indicate that it is obscuring what would otherwise appear underneath it.

1 (1606) p. 87: To assist the understanding of figure III-12, Little Colorado River should be labeled closer to its actual location, river mile 61.5.

d. Other

1 (1940) Each item in the BIBLIOGRAPHY section should be made available for public use at some central location.

CHAPTER TWO
Comments Specific to the Alternatives Outlined in the DEIS

Frequency (I.D. Number) Comment

1. Comments on the Group/Range of Alternatives in the DEIS - 16 statements dealt with this subject.

1 (1944) The range of alternatives in the DEIS is too narrow.

1 (1090) Glen Canyon Dam was authorized by Colorado River Storage Project Act of 1956 with generation of hydroelectric power as an "incident" to the main purpose of the dam. But contrary to letter and spirit of that law, dam has been operated primarily for power generation. Range of alternatives in DEIS is not sufficient to protect natural resources or change this dominant usage. Power production remains paramount in all alternatives analyzed.

1 (1885) Suggest new alternative, Equitable Fluctuating Flow, to provide equitable power production while reducing peak power flows 25%. (Shannon)

3 (0611) No one, not even scientists, knows what the best alternative is.

5 (0276) There should be more flexibility in the operating alternative that would improve conditions for power generation.

1 (1723) Reasonable alternatives for dam management and operation are dismissed too quickly, without adequate discussion.

1 (1489) Support investigation of both operational and non-operational management techniques, etc. to determine best solutions to difficult problems facing resource managers. Integration of operational and non-operational options most effective means of achieving management goals while optimizing individual resources.

1 (1427) Non-operational mitigation should be used where operational mitigation would either be ineffective or less cost-effective after considering costs to all resources.

1 (1724) Conclusions of analysis comparing alternatives are misleading.

1 (0320) Disturbing that the EIS alternatives are evaluated for effects on power operations and marketing.

2. General Comments Concerning Dam Operation Providing Background Information for Discussion of Alternatives - 1,340 statements dealt with this subject.

a. Purpose of the Dam

35 (0643) Balance all uses of the dam and its resources.

Frequency (I.D. Number) Comment

10 (0743) Commend Reclamation and cooperating agencies for efforts to select Preferred Alternative that balances the competing needs for canyon resources. Emphasize this balance to reader.

1 (1825) Make clearer that dam operation goals are joint—society sustaining (electricity and water) and ecology sustaining (Grand Canyon).

8 (0370) In order to balance the demands and uses of Glen Canyon Dam, operation of the dam as known in the past will change.

2 (0455) Use dam and resources to improve environment for all to extent technically and economically feasible.

2 (0849) Dam created ecosystem trades increase in vegetation growth benefiting wildlife with decrease in campable beaches—an example of need to balance competing needs.

54 (0510) Purposes of Glen Canyon Dam remain intact, i.e., regulated flows, water storage, flood control, power generation, and other benefits.

8 (0048) The dam was constructed for several purposes. Electrical power is not the only one.

26 (0735) Power generation should be: is incidental to Glen Canyon Dam operation.

20 (0296) The facility should provide for a steady power flow.

2 (0021) Power generation should not be lost in favor of an administrative decision by FWS to impose critical habitat and endangered species criteria to a study that has already been concluded. It's like changing the rules to get what you want.

b. Dam Operation

1 (1506) Summary p. 18: Lower releases from Glen Canyon Dam are scheduled during nighttime to accommodate more economical nighttime purchases from fossil fuel generators. Higher releases from the Glen Canyon Dam are then possible during the day when fossil fuel generation is more expensive. Sentence could also indicate that low releases are made at night to maximize water available for daytime generation minimizing costly daytime purchases.

3 (0041) Historically it was logical for dam operation to be flood control and power demand oriented. But now that we have seen the damage that it has caused the environment, those needs must also be seriously considered.

148 (0546) Continue to run Glen Canyon Dam as it has run for past 30 years.

162 (0042) Never return to previous operating regime.

1 (1664) p. 6: It is difficult to compare pre-dam and post-dam flow patterns since pre-dam percentages were not provided.

Frequency (I.D. Number) Comment

1 (1509) Summary p. 36, ¶ 1: It is implied that there were no daily or hourly fluctuations under pre-dam conditions, which is incorrect. Flash flooding in both Colorado River and tributaries was common, and often resulted in very rapid and large changes in daily flow volume and stage during storm events. We would agree that the frequency of daily fluctuations has increased during post-dam operations.

1 (1524) p. 6, ¶ 1 under "Historical Perspective": A sentence should be added here disclosing the fact that there were occasional daily fluctuations due to natural events, such as flash floods, sudden snow melt, and storms. The scenario presented here is that the river experienced constant steady flows with gradual changes between seasons.

191 (0037) Glad to note that you recommend reducing fluctuating dam releases.

3 (0842) Most scientists and your officials privately agree that reduction at Glen Canyon Dam need not be as severe as contemplated.

3 (0626) Any alteration of flows must be based on sound engineering and social and economic benefits to Glen Canyon Dam consumers.

1 (0036) The maximum fluctuations you've established are the absolute maximum that should be allowed; in fact I would strongly encourage you to stabilize flows even further.

1 (0032) A maximum flow of 20,000 cfs and a minimum of 5,000 cfs is not low fluctuation. A more environmentally conscious rate would be 50% from the mean. Is this realistic to impose on power demands?

2 (0297) Until studies of fish and river life are complete, even restricted fluctuation should be curtailed.

5 (0608) Operate the dam in a combination of limited fluctuating flows and steady flows.

1 (0033) A year-round flow based on the spring run-off added to the existing inventory and divided by 12 (which may balance near 6,600 cfs) will minimize the negative effects on vegetation, sandbars, fish, cultural sites and wildlife.

2 (2315) Why can't a more gradual ramping rate be used (2000 cfs in 24 hours)?

1 (0054) Ramping rates should be determined using sound geotechnical engineering methods.

1 (0781) Reclamation should not feel constrained by 8.23 million acre feet release requirement; subject to change.

1 (1250) FEIS must disclose impacts appropriate to a release schedule based on a release of less than 8.23 maf; 7.5 maf might be appropriate.

1 (0782) Six million acre feet (based on decennial delivery rate to Lee's Ferry and requirements of Endangered Species Act) would be appropriate minimum.

Frequency (I.D. Number) Comment

136 (0031) The fluctuating flows of historic dam operation have caused extensive damage to the ecosystem.

81 (0039) The summer releases of 33,000 cfs during the daytime peak hours followed by a plummet to 1,000 cfs at night are causing significant impacts on the river ecosystem.

10 (0519) Science shows that fluctuations in river not that bad; in fact may be needed: are more flexible.

2 (0053) Years of research have destroyed Dam operation myths, such as walls of water that rush through the canyon destroying everything in their path.

6 (0052) Research has concluded that water releases cause less than supposed damage to the ecology below the dam, including impacts on wildlife, eagles, and non-native and native fish species.

1 (1448) p. 76: What are the misconceptions that were revealed? They are not described here or in Appendix B.

1 (1500) There is not enough emphasis to explain that the minimum and maximum allowable releases, and the maximum allowable upramp and downramp rates, are not actually achieved on a regular basis. The EIS must identify the fact that the described impacts are consistently overstated because they are based on models that incorporated projected potential releases and not actual releases. (Western)

1 (1505) There continues to be a tendency in this EIS to overstate power-related influences by using maximum possible values to reflect impacts, instead of much more frequent, and less extreme, actual daily values. The significance of differences becomes very important when attempting to discern the finer points of impact differences among alternatives in middle range (e.g., MFF, MLFF, ILFF, and SASF). (Western)

1 (0034) Actual changes from a normal generational release daily flow would amount to a maximum change of raising water level about 12 inches at a time.

2 (1290) Do high flows define the ecosystem? If so, real possibility that management based on daily operations is misdirected and ineffective over the long term.

1 (1670) p. 75: The explanation of effects on aquatic resources from differing ramp rates is very limited. Is this subject treated sufficiently elsewhere?

1 (0869) Consider the impact that the reduced flow will have on lower basin.

12 (0329) The temperature of the water is a function of dam existence—not dam operation.

2 (0145) Colder water conditions are a result of the dam being there.

1 (1084) None of the alternatives would effect the temperature of dam discharges.

Frequency (I.D. Number) Comment

1 (1826) Use term "cold water pollution" to underscore the nature of dam's effects on the ecology.

2 (1331) p. 68: Predictability of seasonal changes in water temperature, another important cue for river's biota, should be given more attention and loss should be noted.

1 (1683) p. 45: It is also arguable whether dam construction or operation is responsible for the decrease in water temperature. The dam was constructed as a deep hypolimnial release structure so that there would be sufficient head to operate it as a hydroelectric production facility. If the dam were not operated, warmer water would flow over the top. This is not the case for turbidity, because sediment settles in the reservoir regardless of the level from which the water is drawn.

9 (0157) Sediment and sand movement along with colder water conditions are the result of the dam being there.

1 (2192) p. 173, Column 2, ¶ 6, Sediment: Glen Canyon Dam effectively halted sediment movement into the Grand Canyon from the Colorado River. Water leaving the Dam is free of sediment and will remain so regardless of changes in release patterns. A lack of sediment to replenish beaches results in a gradual loss. Water Temperature: Glen Canyon Dam draws water from the deep, cold water levels of Lake Powell. Temperature of water leaving the Dam averages about 50 degrees Fahrenheit and will remain so regardless of release patterns. Cold water is needed to maintain the trout fishery but creates a significant impact to chub and other native fishes.

26 (0402) Mitigate the impact of the dam as much as possible.

3 (0944) Changes in operation at Glen Canyon Dam have come with enormous impacts to hydropower operations. Hope ROD will give clear picture of future operations.

1 (0963) DEIS creates doubts that scientific information collected and analyzed correctly will direct changes in dam operation.

8 (1291) Science must be used to determine operational parameters now and for long term.

14 (0653) Clear and convincing scientific evidence must be required before changes in dam operation are made.

c. Legal Issues Affecting Dam Operation and the Alternatives.

3 (1070) Congress established two new legal principals for operation of Glen Canyon Dam: scientific information on condition of downstream natural and cultural resources is to drive operations, and operations are expected to change if changes will protect, mitigate adverse impacts to, or improve condition of said resources.

157 (0126) Dam operations must always be in compliance with the Grand Canyon Protection Act of 1992: EIS should ensure.

Frequency (I.D. Number) Comment

127 (0044) Dam operations should always be in compliance with the Grand Canyon Protection Act of 1992 and the Endangered Species Act.

10 (0409) Amend Grand Canyon Protection Act of 1992 so that future changes in dam operation must meet Grand Canyon Protection Act and Endangered Species Act.

6 (0405) Any future changes regarding flows should comply with the Endangered Species Act.

4 (0573) Grand Canyon Protection Act states that the Act is not intended to affect in any way allocations of water secured by compact, law or decree.

4 (0582) Section 8 of CRSP Act weighed beneficial uses and allocated them carefully. Now some are trying to increase their share.

1 (0425) The U.S. International Border Water Commission concurs that MLFFA will allow U.S. to deliver to Mexico the guaranteed acre feet of water allotted in 1944 Water Treaty.

1 (1392) Annual releases greater than the minimum can be made only to avoid anticipated spills or to equalize storage between Lake Powell and Lake Mead. Oppose any changes to this rule.

3 (1249) Upper Basin states have never agreed that release of 8.23 million acre feet is legal and correct under Law of the River.

1 (1256) New Mexico will not object to the 1988 Hydrologic Determination as long as it does not impair New Mexico's water resource development.

1 (1255) p. 42: Correct New Mexico's interim excess yield to reflect 1988 Hydrologic Determination of water available from Navajo Reservation; 200,000 acre feet per year; New Mexico could use all or part.

3. No Action Alternative (NAA) - 16 Statements Addressed this Subject

1 (1501) Summary p. 14: It should be clarified that the current ecosystem evolved under operations represented by the No Action Alternative. Prior to implementation of interim flows, the ecosystem was roughly at or approaching equilibrium with river flows under this alternative.

1 (1871) Summary p. 7: The NAA cannot provide a baseline for impact comparison because "normal" dam operations were too variable to permit assessment of specific flow effects on the river resources. Only power economics can be assessed under the NAA.

1 (1900) "Base case" and "No Action" not synonymous;base typically is "existing" conditions, while "no action" alternative attempts to quantify impacts of likely future events and measure against base case and the other alternatives.

8 (0645) No action would be best to protect energy and energy users.

Frequency (I.D. Number) Comment

1 (1504) p. 17: The implication here seems to be that the entire possible range is used daily under No Action. Again, it needs to be emphasized that power considerations often considerably restrict the actual range of fluctuating flows.

1 (1525) p. 22, ¶ 1, last sentence: Emphasize that for a number of reasons, the minimum flow is not often achieved. The point to be made is that the actual average minimum release is often considerably above the nominal limit.

1 (1502) Summary p. 16: It should be emphasized that most emergency responses are a matter of minutes, not hours. Please refer to page 158 of the main document, which states that emergency services are needed only for short periods of 1 hour or less.

1 (1503 Summary p. 16: The last sentence could be interpreted to mean that emergencies could result in either of two conditions: (1) going below the minimum flow limit, or (2) that the minimum is not always achieved because of generation needed to meet emergencies. The statement should be clarified to indicate that releases would often remain above the allowable minimum when responding to emergencies.

1 (1499) Summary p. 14, No Action Alternative box: The ramp rates should reflect the actual or "usual" range. The rates could be expressed as a percentage of time representing the frequency with which they occur. Describing ramping rates as "unrestricted" imparts a misleading impression that the full ramp range is used.

4. The Fluctuating Flow Group of Alternatives - 16 statements dealt with this subject.

1 (1681) Summary pp. 18–24: We did not find any acknowledgement in the RESTRICTED FLUCTUATION FLOWS section that weekday and weekend flows would continue to differ. Shouldn't this feature be identified?

5 (0098) Alternatives that continue to allow daily fluctuations are harmful.

5 (0281) I favor implementation of a low fluctuation flow plan.

1 (1491) Summary p. 7: The label "UNRESTRICTED FLUCTUATING FLOWS" is misleading. The No Action and Maximum Flow Alternatives are still subject to various physical and institutional constraints, particularly for allowable minimum flows. Similarly, the use of the words "unlimited fluctuations" mislead readers; should make reader aware of distinctions.

1 (0949) Support LFFA not now part of DEIS.

1 (0950) Endangered fish research of FWS only substantial difference between LFFA and MLFFA.

1 (1428) The MFFA, MLFFA and ILFFA all appear to represent an acceptable compromise between dam operation requirements and benefits to native and non-indigenous aquatic resources in downstream habitats, and we could support. Preference is MLFFA or ILFFA.

Frequency (I.D. Number) Comment

1 (1526) p. 24, Second column, ¶ 1: The last sentence is incorrect; purchases would be made during the night or minimized during the day.

5. Maximum Powerplant Capacity Alternative (MPCA) - No Comments Specific to this Alternative Were Received.

6. High Fluctuating Flow Alternative (HFFA) - 1 statement dealt with this subject.

1 (2318) Preferred Alternative should be the HFFA because common elements will be the major factor in protection of Grand Canyon, since research indicates insignificant difference to environment no matter which restricted fluctuating flow alternative is used.

7. Moderate Fluctuating Flow Alternative (MFFA) - 49 statements dealt with this subject.

a. Support

10 (0371) The MFFA represents a better balance of the uses of the Colorado River resources.

12 (0372) The MFFA should be the preferred alternative.

7 (0382) A majority of the cooperating agencies do not oppose MFFA.

12 (0373) Impacts on ecosystem, cultural and recreational resources very similar under MLFFA and MFFA, but economic impact of MFFA is much lower.

1 (1253) Unless Reclamation can present convincing argument for its Preferred Alternative, alternative with least economic impact should be selected; i.e., MFFA.

b. Oppose

1 (1948) MFFA begins to address problems below the dam but is not the best alternative.

c. Research

6 (0383) Replace the steady flow endangered fish research with a continuation of the moderate fluctuating flow research.

8. Modified Low Fluctuating Flow Alternative (MLFFA) - Preferred Alternative - 14,517 statements dealt with this subject.

a. Development and Definition

1 (1743) DEIS should include explanation of legal process, rationale, methodology and basis for selecting Preferred Alternative, including full bibliography.

1 (1986) p. 27: A reader is hard pressed to find the Preferred Alternative in this Draft. The Table of Contents makes no reference to it, nor does the introductory material. The term "Preferred Alternative" is not even defined in the glossary. Moreover, the rationale for the

Frequency (I.D. Number) Comment

selection of the Preferred Alternative is not presented. The Hopi Tribe suggests that a section be added to the introduction that: a) explains what a preferred alternative is; b) identifies this document's Preferred Alternative; c) refers the reader to a more complete description of it in the text; and d) justifies its selection.

1 (0959) Trust responsibility requires careful adherence in the development, definition, and adoption of the Preferred Alternative.

719 (0070) I agree with: support the preferred alternative selected.

6 (0282) The MLFFA is the best of the available alternatives.

8 (0063) MLFFA has to be a compromise for all factions.

8 (0069) MLFFA sounds like a good option also if the SASFA is not the preferred alternative.

1 (0068) MLFFA is my second choice as Preferred Alternative, provided that endangered fish studies and habitat maintenance flows are incorporated and the money is spent to raise the height of the four spillway gates.

1 (1851) Some realistic, reasonable and prudent test should be applied to the chosen alternative to determine if it meets some threshold of economic justification and economic analysis.

12 (0460) EIS fails to explain why the preferred alternative was selected.

1 (0466) Preferred Alternative is weak. Backup is not good in comparison to other alternatives.

5 (0772) DEIS doesn't explain why MLFFA is the Preferred Alternative (over SASFA) and: or MFFA, and must provide clear and complete explanation for public scrutiny to comply with process.

1 (1146) Support implementation of Preferred Alternative, but are not sure it is the best alternative due to shortcomings in data analysis, economic analysis, and gaps in knowledge of some issues.

3 (1274) Because Preferred Alternative developed late in process, its effects have not been studied with same level of intensity as those of other alternatives.

2 (0588) At what cost to the public would Preferred Alternative be eliminated?

1 (0846) Is selection of MLFFA as Preferred Alternative indication that natural resources are less valuable than power generation since SASFA is clearly better for resources? Does hydropower still rule Colorado River, contrary to intent of Grand Canyon Protection Act?

1 (1433) DEIS does not specifically state that greater power productivity of MLFFA outweighs the environmental and recreational benefits of SASFA.

Frequency (I.D. Number) Comment

1 (1788) Only reason MLFFA chosen as Preferred Alternative is because it compromises ability of Glen Canyon Dam to produce peaking power less than SASFA.

1 (1835) Selection of MLFFA as Preferred Alternative clearly shows power production still takes priority over all else.

23 (0066) MLFFA should not be the preferred alternative.

2 (0065) MLFFA is nothing more than a compromise, and the time for compromise is past.

1 (1744) Delete subliminal hints throughout DEIS that MLFF is "preferred" alternative; obviously not preferred by all agencies or people.

10 (0632) Operating criteria in MLFFA are the same as in Interim Operating Criteria.

1 (1654) Summary p. 21: The second sentence refers to this alternative as having "...essentially the same monthly operating plan..." Because of RPA flows with low summer releases, this no longer should be included. The table for this alternative should also be adjusted to show RPA flows.

1 (1988) p. 30: This paragraph implies that the low fluctuating flows will not be reinstated once the research flows are completed. Instead, flows closer to the Seasonally Adjusted Steady Flows will be implemented. If this is the intent, then the reality of this alternative should be better explained.

3 (1302) Summary p. 23: Research flows are incorrectly identified as spring and summer rather than spring through fall.

1 (0270) Do not allow the power lobby to water down flow limits.

2 (0078) Hope Reclamation will adopt the preferred alternative and provide an Adaptive Management Program to accomplish the goal of the preferred proposal.

1 (0951) Cannot support MLFFA until details of how research flows will coordinate with long-term monitoring and research under Adaptive Management Program are made known with opportunity to comment before final EIS and ROD.

2 (0636) Research parameters should not be fixed in Preferred Alternative. Adaptive Management Program and monitoring and research process are more flexible.

1 (0527) Shouldn't those who benefit most from the Preferred Alternative pay the costs?

b. Comparison to Other Alternatives - Impacts

1 (2101) p. 54, Table II-7: The summary of impacts presented for MLFF in this table is for MLFF prior to the inclusion of endangered fish research flows. The Preferred Alternative as stated elsewhere in the document is a combination of low fluctuating flows and seasonally adjusted steady flows, i.e., endangered fish research flows. Readers have no basis for

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assessing the impacts associated with the Preferred Alternative, and worse, they are given inaccurate information. The reason for this unacceptable situation is that there is no indication of how frequent the endangered fish research flows will be staged or for how many years. No basis for determining impacts because the alternative is not adequately defined or understood, and the authors of the document are hence unable to calculate impacts for the Preferred Alternative. This is indefensible and a significant breach of compliance with the letter and spirit of the National Environmental Policy Act (NEPA).

1 (0413) Adopt MLFFA on a trial basis for 3–5 year period to determine if downstream damage is reduced.

4 (0585) Suggested changes don't give us cleaner air, or better water quality; what do we get?

c. Deficiencies and Suggested Modifications

1 (0601) Fluctuations allowed in MLFFA underscore Reclamation commitment to goals other than restoring Colorado River ecosystem.

2 (0853) Allowed fluctuations of MLFFA are too large and unpredictable on a daily basis.

12 (0360) Scientific data suggests that 25,000: 4,000 flow changes could further improve environment and power generation without risk to downstream resources (would not harm beaches, riparian habitat, or fish).

7 (0353) Flow changes recommended by scientists and cooperating agencies will not harm downstream resources.

22 (0352) Cooperating agencies and scientists in accordance with Grand Canyon Protection Act recommended changes (raising ramp rate from 2,500 cfs per hour to 4,000, and maximum releases from 20,000 cfs to 25,000) should be carefully implemented.

26 (0345) The preferred alternative should include the flow changes recommended by the scientists and cooperating agencies.

2 (0067) Consider modifying the preferred alternative to bring in some of the benefits of the SASFA.

1 (1016) Support MLFFA; however, should monitoring show FWS's preferred alternative is better, would like to see appropriate changes implemented.

1 (1435) Current structure of MLFFA would prohibit routine use of SASFA in the future, even if studies show they are justified without another EIS process. Broader, more well defined Preferred Alternative would permit greater scope for adaptive management and allow operations to occupy sliding scale from MLFFA to SASFA.

1 (1966) Preferred Alternative fails to justify the minimum releases—8,000 cfs between 7 am and 7 pm that are higher than the 5,000 cfs minimum at night.

Frequency (I.D. Number) Comment

1 (1954) Redefine the up ramping limits so they are not prone to abuse. For instance, up ramping limits could be defined as "not to exceed 50 cfs: minute and 2,500 cfs within any 60 minute period.

2 (1148) DEIS does not incorporate impacts of the RPA from the Draft Biological Opinion into the preferred alternative.

3 (0641) MLFFA emphasizes and promotes hypothesis, speculation, and suppositionat expense of credible science.

26 (0494) DEIS is incomplete: impacts of Preferred Alternative, including economic, and: or environmental, not adequately presented.

7 (0464) Economic issues have not been addressed based on Preferred Alternative selected.

11 (0378) The preferred alternative may result in economic impacts not adequately defined.

101 (0375) The DEIS fails to and must adequately consider all the economic impacts of the preferred alternative.

28 (0392) Economic impacts of MLFFA may be much greater than identified in the DEIS.

1 (1536) p. 61: The annual economic cost for the NEPA preferred alternative should be provided prior to the FEIS.

11 (0525) The Preferred Alternative does not give balanced weight to the economic side of the environmental scale.

1 (0698) Would like to see some of the damage of the 1980's repaired as part of Preferred Alternative.

4 (0613) MLFFA needs to have more specific goals in order for Grand Canyon National Park to reach its highest potential.

5 (0886) Preferred Alternative may make things worse. There are no defined resource goals and no idea if system is capable of supporting better conditions.

4 (0648) The effect of Preferred Alternative on integrity of Upper Colorado River Basin fund must be defined.

d. Support and Reasons for Support

17 (0728) Support MLFFA because it is best for Grand Canyon ecosystem.

21 (0081) I support the MLFFA because it gives higher priority to the protection of the Grand Canyon than to power generation.

Frequency (I.D. Number) Comment

3 (0401) Implement MLFFA as soon as possible to moderate further ecosystem damage down the river.

53 (0083) I support the MLFFA because it seeks to end the historic pattern of wild daily fluctuations in the Colorado River level that has played havoc on the fragile ecosystem.

2 (0079) The MLFFA may not be perfect, but it is a significant step forward toward long-term protection of the Grand Canyon and would serve as a model for the operation of other environmentally destructive dams in the United States.

1 (0407) Support MLFFA because range of environmental goals are set and indicators monitored.

1 (0769) MLFFA provides great improvement to ecosystem at a reasonable cost with reasonable impacts.

16 (0399) Support MLFFA because high releases as proposed are fundamental in beach restoration.

32 (0082) I support the MLFFA because it emphasizes endangered species (contains FWS modifications).

9 (0077) I support the MLFFA, which provides flows that are closest to the so-called "natural flows."

57 (0076) I support the MLFFA because it will stabilize the fluctuations.

11 (0408) Support MLFFA because it provides for Adaptive Management Program.

20 (0398) Support MLFFA because it provides for monitoring and Adaptive Management Program.

5 (0406) Support MLFFA because research and monitoring plan are managed by a scientific team.

7 (0657) Support MLFFA because it puts: if it puts science first.

1 (1117) Support MLFFA with scientifically sound research to determine effects of seasonally adjusted steady and low fluctuating flows on endangered and native fish.

6 (1923) While SASFA is better or equal to MLFFA for most resources, the substantially greater economic cost of the SASFA makes the MLFFA the best compromise alternative. Addition of research flows, however, would make economic costs the same for the period of the research.

44 (0292) Glad that the economic exception did not make it into the preferred alternative.

25 (0400) MLFFA provides for a balance of power, environment, and local water needs.

Frequency (I.D. Number) Comment

1 (0792) Support MLFFA because it includes public input.

2612 (0073) I favor the preferred alternative with the following condition: that the long-term monitoring and adaptive management programs be fully funded so that the needed studies can be completed.

2612 (0072) I favor the preferred alternative with the following condition: ensure preservation and replenishment of beaches by funding a long-term solution to sand depletion.

2616 (0071) I favor the preferred alternative with the following conditions: Ensure that the monitoring and adaptive management program be developed with public involvement, be scientifically based, and insulated from political pressure.

2614 (0074) I favor the preferred alternative with the following condition: ensure that endangered species and other studies are based on a solid scientific research program made credible through peer review, such as the National Academy of Science process.

2615 (0075) I favor the preferred alternative with the following condition: fund and begin NEPA compliance studies to understand pros and cons of possible installation of a temperature control device at Glen Canyon Dam that would allow warm water to be sent downstream to protect and restore endangered species.

1 (1063) Support Preferred Alternative conditioned upon inclusion in FEIS of articulation of relationship between future flow decisions that deviate from the Preferred Alternative flows and the scientific and monitoring data.

1 (1062) Support Preferred Alternative conditioned upon inclusion in FEIS of specific process and timetable for creating Adaptive Management Program.

1 (1064) Support Preferred Alternative conditioned upon inclusion in FEIS of a commitment to scientifically sound research to determine the effects of seasonally adjusted steady and low fluctuating flows on endangered species of native fish.

e. Legal Mandates Concerning the Preferred Alternative

4 (0412) MLFFA is the preferred method for meeting goals of Grand Canyon Protection Act of 1992 and Endangered Species Act.

1 (0596) Impacts of Preferred Alternative on Colorado River Compact negligible.

9. Interim Low Fluctuating Flow Alternative (ILFFA) and Interim Operating Criteria (IOC) - 5,817 statements dealt with this subject.

a. Definition

4 (0342) Both the interim operating criteria and the flow changes suggested to it need further study.

Frequency (I.D. Number) Comment

1 (0654) Changes in dam operations from where we are now (Interim Operating Criteria) should be done only after Adaptive Management review.

6 (0633) Operating criteria in ILFFA are the same as in Interim Operating Criteria.

20 (0330) Reclamation blocked changes to Interim Operating Criteria recommended by scientists and cooperating agencies in accordance with provisions of Grand Canyon Protection Act.

b. Support and Reasons for Support

2837 (0307) The interim operating criteria provide the best starting point for future operation of Glen Canyon Dam.

2920 (0084) The ILFFA with the changes your Cooperating Agencies Group recommended should be the preferred alternative.

5 (0339) Best course of action (Preferred Alternative) is to continue the interim operating criteria with possible inclusion of flow changes suggested by scientists and cooperating agencies.

4 (0861) If budgetary constraints eliminate future studies, would like to see interim flows become permanent.

1 (0531) Interim flows give balance to the economic side of the environmental economic scale.

c. Opposition and Reasons for Opposition

2 (0887) Problems created by Interim Operating Criteria would continue under Preferred Alternative.

1 (0665) Would oppose ILFFA as Preferred Alternative because it doesn't provide enough protection for endangered species.

d. Impacts of the ILFFA and IOC

8 (0639) Adjustments to dam operations (Interim Operating Criteria) have benefited all of the canyon resources and areas associated with river habitat below Glen Canyon Dam.

2 (1426) Interim flows have adequately addressed those problems that were caused by dam operation. Preferred Alternative inappropriately tries to solve problems for which operations are not responsible.

1 (0683) During last 2 years studies of Interim Operating Criteria have given us good idea of affects on resources.

3 (0340) Because of the flood years, there are only two years of data on interim operating criteria.

Frequency (I.D. Number) Comment

2 (0341) Because flood years limited data available on interim operating criteria, do not have sufficient base from which to judge future changes.

10. The Steady Flow Group of Alternatives - 30 statements dealt with this subject.

8 (0100) The steady flow alternatives provide more favorable results overall.

3 (0099) The YRSFA or SASFA would reclaim for now and the future the natural flow of the river.

16 (0528) Science hasn't proven that steady flows are best for preserving Grand Canyon. In fact suggest that they cause environmental degradation.

1 (1508) Summary p. 25, ¶ 4: It should be noted that the Glen Canyon Dam will likely not be relied on for Automatic Generation Control for extended periods if a steady flow alternative was implemented.

1 (2259) p. 246, Column 1, ¶ 1: We agree with your comment regarding steady flows resulting in filling of return flow channels. However, we think the necessity for "habitat-building flows" to make this alternative work make it unworkable due to the extreme uncertainty such flows can be managed to avoid impacts to other resources. Your paragraph should speculate on these uncertainties.

1 (1320) p. 31: Graph for moderate release year does not show the SASFA pattern as other two do; why?

11. Existing Monthly Volume Steady Flow Alternative (EMVSFA) - 5 Comments Dealt with this Subject

2 (0085) I endorse the EMVSF alternative because it is least costly.

1 (1936) Prefer EMVSFA; it is a reasonable balance between economic uses of Glen Canyon Dam and environmental protection of the Grand Canyon.

1 (1949) EMVSFA, coupled with an occasional flood, habitat restoration flows, sand augmentation, and temperature intake structure, might be a good solution.

1 (1364) pp. 204, 212: Don't understand why the listed reliable minimum flow is 9,000 cfs.; 8,000 cfs stated in Chap. II, p. 32 is 8,000 cfs and is more logical.

12. Seasonally Adjusted Steady Flow Alternative (SASFA) - 174 statements dealt with this subject.

a. Flows

1 (1783) Implementation of SASFA will provide much needed baseline mimic of pre-dam flows, allowing Adaptive Management Program to then be used as tool to see if occasional fluctuations could be beneficial.

Frequency (I.D. Number) Comment

1 (1865) SASFA flow regime is not a natural flow regime.

b. Impacts

3 (0087) The table on pages 60–65 of the Summary Draft and pages 54–61 of report DEIS indicate that the SASFA provides the best overall results.

c. Reasons for Support and Opposition

1 (2332) pp. 50–53: SASFA is equal to MLFFA for water, fish, vegetation, wildlife, and habitat. For recreation SASFA was superior. DEIS rates SASFA and MLFFA equal for sediment, but believe that SASFA is superior. All agencies but FWS rate SASFA equal to MLFFA for endangered species. FWS say it's superior and have last say under Endangered Species Act. For hydropower, DEIS rates MLFFA and MFFA superior to SASFA. Disagree with analysis and believe SASFA is equal for stated objective of providing the "greatest amount of long-term power and energy."

84 (0088) SASFA alternative sounds best : I prefer the SASFA alternative.

3 (0089) The SASFA best meets the mandate.

5 (0095) Only reasonable option (other than removing the dam) is SASFA.

5 (0093) I support the SASFA because none of the other alternatives address the concerns as effectively.

1 (1782) SASFA improves the aesthetic and wilderness value of Grand Canyon more than any other "accepted" alternative.

16 (0096) Seasonally adjusted flow offers the most benefits to the river environment: is environmentally superior.

16 (0298) The SASFA does the most to restore the river to pre-dam conditions.

2 (0094) SASFA is long-term investment in the health of people, the wildlife, and the economy.

5 (0091) I support seasonally adjusted steady flows as addressing all concerns with the most balance.

21 (0090) SASFA will have positive influence on all factors except electricity.

2 (0086) The opinion of the FWS that supports the SASFA should be given high priority.

1 (2304) SASFA does not balance the demand for scarce resources.

1 (1950) SASFA would not be a good alternative.

Frequency (I.D. Number) Comment

d. Suggested Modification and Questions

1 (2325) p. 29: The SASFA should include Endangered Fish Research as described under the MLFFA.

1 (2127) p. 33, Column 2, Paragraph 1: According to Randy Peterson of Reclamation, the timing of the 20,000 cfs release in April does not allow Reclamation to manage the reservoir to allow flexibility for April 1st forecast—no space is left at that point. Therefore, the frequency of spilling would increase. Is this true? What are the ramifications of this condition?

2 (1181) Close examination of economics suggests that much of costs of SASFA are associated with potential low flows in August. FEIS should examine whether a Preferred Alternative is possible closer to SASFA, but allowing some fluctuating flows in August providing benefits at lower cost (Marcus).

1 (0713) Info about economic costs of SASF inadequate. Separate immediate and projected costs as projections could change with conservation.

1 (0393) Economic impacts of SASFA may be much greater than identified in the DEIS.

13. Year Round Steady Flow Alternative (YRSFA) - 3 statements dealt with this subject.

1 (1951) YRSFA would make the river more like a canal; not a good alternative.

2 (1304) Summary p. 28: Statements in this section seem contradictory; clarify.

CHAPTER THREE
Elements Common to All Restricted Fluctuating Flow and Steady Flow Alternatives

Frequency (I.D. Number) Comment

1. Adaptive Management Program (AMP) and Long-term Monitoring and Research (LTM&R) - 8,636 statements dealt with this subject.

a. Legal Mandates

15 (0729) Adaptive Management Program must be based on fulfillment of Grand Canyon Protection Act mandate to protect and restore downstream resources.

2 (1127) Whether the Secretary of Interior chooses to employ "adaptive management" or some other process for management of Glen Canyon Dam, the process must be based on principals of Grand Canyon Protection Act.

4 (0986) p. 34: Public should be clear that Adaptive Management Program and long-term monitoring and research programs are required by law as part of Grand Canyon Protection Act.

2 (1126) Grand Canyon Protection Act does not mandate the particular form of Adaptive Management Program found in the DEIS.

2 (1125) Grand Canyon Protection Act does not mandate "adaptive management." It requires long-term monitoring to shape future operations of the dam.

1 (1412) Because DEIS seems to leave so many decisions to be made by the Adaptive Management Program, it is questionable that mandate of Grand Canyon Protection Act to "describe long-term operations and other reasonable mitigation measures" has been met.

3 (0751) Monitoring and research plan will not meet Grand Canyon Protection Act mandate without clearly defined research design and objectives tied to the law.

1 (1221) Preferred Alternative may not be final answer to meet the requirements of the Grand Canyon Protection Act; long-term monitoring and research and Adaptive Management Program will show whether any fluctuations should be allowed.

1 (0973) Goals described in Grand Canyon Protection Act and management objectives of Grand Canyon National Park must be factored in and trust responsibilities can't be ignored; imposes unique and complicating factors on outcome of adaptive management efforts.

6 (0365) Grand Canyon Protection Act of 1992 requires Secretary of Interior to consult with specific group in Adaptive Management Program and monitoring and research when suggesting adaptation of operating criteria.

2 (0359) Grand Canyon Protection Act of 1992 requires all post-decision research programs be adopted after consultation with specific groups identified in the Act.

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3 (0635) Grand Canyon Protection Act states that post-ROD research programs should occur only after consultation.

1 (1400) More effort toward identifying issues, which might require a NEPA process and possible solutions under Adaptive Management Program, should have been presented in DEIS.

2 (1025) How Adaptive Management Program would trigger NEPA process should be determined. Would small incremental changes requiring at most EA and FONSI be anticipated or programmatic EIS covering a span of seasons or years covered by monitoring and adaptive management? Would NEPA be triggered only by significant decisions warranting substantial changes in management of resources? Would major experiments in the system also be documented under NEPA? If so, decision makers for NEPA compliance and adaptive management need to be identified.

1 (1747) Unless Adaptive Management Program will have legal responsibility for NEPA compliance, no reason for creation of yet another bureaucracy.

3 (1398) By deferring definition of Adaptive Management Program, EIS team leaves water and power users, resource managers and federal decision makers unable to understand potential impacts of the alternatives; violates NEPA.

1 (0837) The relationship between Adaptive Management Program and Endangered Species Act should be clear.

11 (0115) The relationship between the Adaptive Management Program and the recovery plan for endangered species needs to be made more clear in the EIS.

1 (0960) Trust responsibility will govern relationship of Tribe to Adaptive Management Program and long-term monitoring and research. Require additional criteria.

1 (1965) Adaptive Management Program should comply with laws mandated by National Historic Protection Act.

1 (1746) If Adaptive Management Program will have legal authority to implement modification of flows, even if data shows some other flow scenario would be beneficial to the resources, this empowerment and methodology needs to be stated in legal terminology.

2 (0755) NPS and FWS can not abdicate legal responsibility to protect resources for which responsible. Must retain primary responsibility for recommending changes involving resources.

1 (1038) See recent court rulings regarding violations of Federal Advisory Committee Act in development of key documents for the Northern Spotted Owl EIS.

Frequency (I.D. Number) Comment

b. Definition and Organization of AMP

1 (0778) See work of Jack Stanford at University of Montana for information on Adaptive Management concept we could support.

1 (0969) DEIS fails to define Adaptive Management Program structure that includes all parties while maintaining a workable size, is accountable to public, and reflects government responsibilities, including federal trust responsibilities for Tribal resources.

130 (0111) Monitoring and Adaptive Management Program should be developed with public involvement, be scientifically based, and insulated from political pressures.

3 (0112) Once preferred alternative is accepted, an effective Adaptive Management Program should be developed with real life time frames and powers of enforcement set forth.

1 (1035) The outstanding issues regarding the Adaptive Management Program should be resolved to greatest extent possible prior to release of FEIS.

7 (0110) Specific deadlines should be set for developing the Adaptive Management Program.

1 (1292) Adaptive Management Program should not be encumbered by inflexibility or arbitrary restrictions that could limit ability to respond to change.

2 (1034) Operational flexibility afforded by Adaptive Management Program is essential to effectively manage the physical and biological systems along the river to protect, mitigate adverse impacts to, and improve the values of Grand Canyon National Park and Glen Canyon National Recreation Area.

2 (0900) Adaptive Management Program should not be undermined at outset by selection of Preferred Alternative with narrowly defined set of research flows limiting flexibility; could delay action.

1 (0823) The name of the Adaptive Management Program should change to reflect priorities of Grand Canyon Protection Act to be called "Natural Systems Management Plan."

54 (0129) I support the Adaptive Management Program.

2 (1231) The Adaptive Management Program concept is the most scientifically defensible way to operate the dam since it deals with a dynamic system; good precedent for other systems.

10 (0482) Adaptive Management Program will allow us to learn as we go and do the best that we can: gives flexibility needed to adapt dam operations to science.

6 (0983) p. 34: Adaptive Management Program is most critical component of the EIS process and should be resolved before ROD.

1 (2091) p. 34: In spite of best efforts of GCES scientists and significant expenditures of research funding, scientific community unable to predict with acceptable certainty the

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consequences of dam operation alternatives. The Colorado River ecosystem is inherently dynamic and is subject to variety of inputs that can vary through time. Cooperating Agencies have consistently held that program of adaptive management is necessary to address these issues. Because adaptive management plays critical role, it is second in importance only to actual flow scenario prescribed in ROD. Adaptive management also expected by Cooperators to provide avenue for diverse Glen Canyon Dam: Grand Canyon stakeholders to have direct influence on dam operations. As such, it is the "Sunshine" provision of the new era of responsive dam management. Adaptive management entails more than just consultation for stakeholders. It grants and requires active participation in the management of the dam and downstream resources. The description of adaptive management in the DEIS must be substantially expanded and made more definitive to fully articulate the above issues.

1 (2092) p. 34, Paragraphs 4 and 5: The need for adaptive management and the specific purpose of the proposed program must be correctly and adequately defined in the EIS. The purpose of adaptive management is to provide future flexibility because of dynamic nature of system, we are not able to confidently predict the outcome of any of the proposed alternatives and, unable to prescribe a flow regime that meets the Grand Canyon Protection Act mandate for resource protection or schedule for EIS completion. As currently presented in the DEIS, the adaptive management concept is merely a mechanism to allow for future tinkering with dam operations (operational flexibility). While adaptive management clearly must respond to Grand Canyon Protection Act mandate, its specific objective is to accommodate the lack of current scientific understanding and to provide a mechanism to respond to unforeseen ramifications of the dam management program, which is ultimately adopted in the Record of Decision. (Navajo)

152 (0469) Adaptive Management Program is vague: inadequately defined in DEIS: should be clearly defined in FEIS.

3 (0346) The Adaptive Management Program is not fully developed in the preferred alternative.

1 (1990) pp. 34–35: Concerned regarding the nebulous development and presentation of Adaptive Management as a Common Element. The analysis, evaluation, and mitigation of the effects of each alternative hinges on adaptive management and long-term monitoring. Yet Adaptive Management and long-term monitoring remain as embryonic concepts. The Hopi Tribe requests that the Bureau of Reclamation commit to a "nuts and bolts" presentation of adaptive management, including how it will be formally organized.

10 (0367) (Cooperating agencies all) agree that there should be an Adaptive Management Program that allows consultation by all interested parties.

7 (0638) (Cooperating agencies and interested parties) agree that Adaptive Management Program should include process for implementing change.

4 (0637) Cooperating agencies and interested parties agree that Adaptive Management Program should include monitoring and research.

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1 (2128) p. 34, Column 1, ¶ 5: The concept of Adaptive Management is not new; some would say it has always been used at Glen Canyon Dam. What seems new is the concept that regulated river management should now consider a variety of resources not previously included, like recreation and ecology. Management of dam operations has always reflected and incorporated into the operating plans those resources represented as being worthy of consideration. Recreation and ecology are resources deemed by the authors to be worthy of consideration in management of Dam operations along with resources previously considered, such as water demands, hydropower operations, and flood control. This seems reasonable, but the trick is achieving an acceptable balance of all resource considerations. Is balancing considerations an intent? Will there be priorities?

1 (1529) p. 34: The objective stated in second paragraph of this section provides no wording to allow adaptive modification of alternative dam operations to improve operational efficiency: benefits while meeting Grand Canyon Protection Act mandate. Adaptive Management door should swing both ways to find most beneficial balance of issues and resources. Add to sixth line so it reads "improve values for which Glen Canyon Dam was constructed and Glen Canyon National...were established" or similar language.

3 (1071) Because Adaptive Management Program is so critical to future operation of the dam, the credibility of the process used for its development is essential to its success. Process must be full and fair in reality and perception.

21 (0331) The fact that Reclamation blocked recommended flow changes raises questions about feasibility of Adaptive Management Program to operate effectively after completion (as stated by the Hopi and Navajo tribes).

2 (1293) If the results of Adaptive Management Program process are denied in practice, the alternatives in DEIS are not viable.

1 (0786) Process by which flow changes were recommended was not adaptive management and is not model for future. Did not comply with Grand Canyon Protection Act criteria.

1 (1819) Opposite of Adaptive Management Program adaptability is increased risk of manipulation.

4 (0417) Pessimistic that an Adaptive Management Program will work in interest of natural resources.

2 (0624) Adaptive Management can only be interpreted as adaptive damage.

20 (0120) The Adaptive Management Program should be very clear as to which agency is leading the Adaptive Management Program decision-making process.

1 (0609) Adaptive Management Program needs a facilitator—someone who can objectively guide Adaptive Management Program through next phase.

1 (1058) There needs to be a senior scientist overseeing the Adaptive Management Program.

Frequency (I.D. Number) Comment

2 (1019) Which agency: agencies would chair or lead work group and technical work group, and to whom would they be administratively and fiscally responsible?

192 (0316) The Secretary of Interior or a senior official reporting to him (not affiliated with resource management agencies) should direct the Adaptive Management Program and review and recommend changes in compliance with GCPA.

1 (2093) p. 34, Paragraph 6, 7, 8: To be credible and successful, Adaptive Management Program must clearly identify participants, how linked to decision-making, and how will articulate with each other and interested parties. Adaptive Management Program in DEIS does not meet requirements. Authority and responsibility for Adaptive Management Program must rest with Secretary of the Interior. Typically, Secretary will delegate responsibility to agency within Department. While Reclamation has done an admirable job with DEIS, any single agency is too limited to be able to meet challenges Adaptive Management Program will require. Recommend that a position at level of staff to an Assistant Secretary be established to direct and oversee Adaptive Management Program and report to Secretary. Suggested text would read: "The Adaptive Management Program shall be under the direction of an Assistant Secretary in the Department of the Interior and not the staff of a specific agency. The Adaptive Management Program will consist of an Adaptive Management Work Group, a technical work group and an Independent Scientific Review Panel. The appointee will convey recommendations of Adaptive Management Work Group to Secretary for final disposition." (Navajo)

1 (1748) Adaptive Management Program should stand as an autonomous entity from Reclamation, under direction of Secretary of Interior, not as manipulated extension of Reclamation through GCES.

1 (0984) p. 34: NPS must assume more active role in development and administration of the Adaptive Management Program.

12 (0428) The NPS should play a strong role or lead in operation of this program: Adaptive Management Work Group.

2 (0985) p. 34: NPS cannot transfer responsibility for resources to another agency, and resources entrusted to NPS cannot be managed by committee without strong NPS direction.

1 (0523) There should be more direct control by FWS for endangered species in Adaptive Management Program.

3 (0592) Adaptive Management Program conceptually flawed because FWS maintains authority over all decisions by the committee. Undermines value of committee.

101 (0314) Adaptive Management Program must be supported by adequate funding.

1 (1687) FEIS should state who would be fiscally responsible for the Adaptive Management Program, how much it will cost, and what it will produce for that cost.

Frequency (I.D. Number) Comment

1 (1022) FEIS should contain a comparison of costs and products of GCES and estimates of costs and products of Adaptive Management Program; would help decision makers and public determine funds and effort expended to date compared to future likely expenditures and benefits.

3 (0472) Will Adaptive Management Program be funded by all or just by power users? Should be funded by all.

1 (2313) Funding for Adaptive Management Program should come out of dam operations, not out of the Federal Treasury.

6 (0672) Adaptive Management Program and: or monitoring and research should be adequately funded from power plant revenues: people who benefit from subsidized power.

1 (1843) "Operational flexibility" of Adaptive Management Program sounds like a way for Glen Canyon Dam managers to justify not wholly complying with results of EIS.

1 (1833) Adaptive Management Program is too loose and subject to political manipulation.

1 (1822) No one wants over-regulation, but under-regulationas Adaptive Management Program now stands is worse.

1 (0064) The MLFFA relies too heavily on the Adaptive Management Program process to resolve disputes in biological opinions and could be used to indefinitely delay action.

1 (1844) Adaptive Management Program has potential to become either a disaster or a great success, and with such uncertainty should not be implemented as is.

1 (1790) Nervous at concept of adaptive management—scientists may treat it as a blank check.

1 (1820) DEIS contains no protection against special interests manipulating research of Adaptive Management Program.

2 (1128) Structure of Adaptive Management Program in DEIS is good starting point, but inadequate to ensure that long-term monitoring and research and decisions based on long-term monitoring and research will not be based on non-scientific considerations.

1 (1776) Adaptive Management could be a good concept, but not in way presented in the DEIS as obvious excuse to continue catering to power industries and to self-perpetuate bureaucracy.

1 (1738) DEIS does not outline who will be a member of Adaptive Management Program and for how long.

1 (1261) Success of Adaptive Management Program dependent on make-up of the team members and willingness of future Administrations to let process dictate direction and changes.

Frequency (I.D. Number) Comment

2 (1040) FEIS should describe how the group of interested parties would be assembled and what privileges and responsibilities each party would have.

1 (0974) Linkages of stakeholders must be established immediately looking at GCES: GCEIS structure, participation and cooperation to set specific future direction for agency, cooperator, and public input, describe gathering of information, feedback loops, advisory status, and decision making authority (graphic in document).

4 (0366) Mechanics for consulting groups identified in Grand Canyon Protection Act not outlined in current Adaptive Management Program and monitoring and research description in EIS.

1 (1688) Adaptive Management Program unclear as to what the level of participation will be from other federal, state, local agencies, tribal governments, and other interest groups.

7 (0121) Federal agencies should form a Federal Advisory Committee to assist in making future decisions on Glen Canyon Dam operation that is based on monitoring results.

1 (0116) Federal Agencies should form an advisory committee, and there should be specific guidelines concerning the recommendation, decision making, and enforcement process.

5 (1072) The Adaptive Management Program Work Group should be organized under the Federal Advisory Committee Act.

232 (0396) Adaptive Management Program must have independent scientific oversight: review.

1 (1041) How would independent reviews by scientific experts be used in decision making under adaptive management?

2835 (0312) The Adaptive Management Program proposed ensures that future experiments, studies, and proposed changes to operations will be reviewed by independent scientific experts before changes are made.

25 (0470) Adaptive Management Program needs process for review and approval by the public.

28 (0113) The Adaptive Management Program should be developed in a public process, which includes the involvement of interested scientists and the public.

83 (0124) I urge the mandated inclusion of all interested parties (power, water, environmental, recreational) in equal parity in the management process.

1 (0369) All interested parties should have an equal say in the Adaptive Management Program and long-term monitoring and research process of the preferred alternative from the start.

125 (0285) Adaptive Management Program must be insulated from: not dominated by political pressure.

156 (0315) Adaptive Management Program must be independent of power interests.

Frequency (I.D. Number) Comment

7 (1245) Important that the seven Colorado River Basin States be included in and consulted about any further changes in dam operation especially as part of Adaptive Management Program.

1 (0513) Remedial protection acts should not happen without input from locally elected officials and public; not unilaterally enforced by agency representation.

1 (1028) Rapport that has grown between participating agencies, tribes, and interested parties is essential foundation for successful adaptive management in the future.

1 (1026) Would like to help in further development of Adaptive Management Program to occur between DEIS and FEIS.

1 (1686) Request that Reclamation afford the opportunity for the Bureau of Indian Affairs and Indian Tribes to participate fully in the Adaptive Management process.

1 (1942) Education center at Lee's Ferry or Page would be a great place to inform the public of the ongoing Adaptive Management Program process.

8 (1060) Process and procedures for Adaptive Management Program need to be defined in detail now.

2 (0234) Any process by which monitoring results are used to change operation of the dam should be done on a specific schedule (perhaps every five years).

4 (0128) Any process by which monitoring results are used to change operation of the dam should be done on a specific schedule (perhaps every five years).

48 (0284) Adaptive Management Program must spell out a specific means for arbitration.

46 (0294) Adaptive Management Program should include process and authority to make timely changes when necessary to prevent further damage: manage resources well.

9 (0816) How will Adaptive Management Work Groups and independent scientific review panel interact with federal agencies including Reclamation?

5 (0666) Secretary should get 3 groups to develop within 90 days of ROD resource standards, procedures, and protocols.

6 (0123) Adaptive Management must have functional work group, technical group, and scientific group at time of ROD.

6 (1069) Secretary of Interior should appoint members of Adaptive Management Program Work Group, Technical Advisory Work Group, and identify Independent Scientific Review Panel at the time of decision on FEIS.

1 (1036) Agreements between interested parties should be signed as soon after ROD as possible to expedite implementation of Adaptive Management Program.

Frequency (I.D. Number) Comment

2 (0982) p. 34: Section on adaptive management needs additional definition of realistic mechanisms for implementation.

1 (1749) Adaptive Management Program decisions, recommendations and powers should not be limited by Reclamation policy.

2 (1017) How will Adaptive Management Program function to produce results different from those anticipated under the status quo? Is it a structured way of implementing monitoring results?

2 (1042) How would annual and long-range operating criteria be modified to reflect changes resulting from adaptive management?

1 (1094) How would information and recommendations be transferred between the Technical Work Group and the Adaptive Management Work Group?

18 (0576) DEIS is deficient in its descriptions of Adaptive Management Program details of how and by whom decisions will be made in timely and acceptable manner.

1 (2097) p. 34: The task of maintaining a scientific data base should be described in greater detail to communicate to the reader its ultimate magnitude and the need for facility fully dedicated and funded for this purpose. The phrase "coordinate scientific review of the long-term monitoring and research programs" should be expanded to clarify who is coordinating with whom. Is the Technical Work Group meant to coordinate the Scientific Advisory Committee, and what will that coordination consist of?

6 (0471) Adaptive Management Program needs to explain how science can be implemented.

41 (0114) The Adaptive Management Program should strive for specific goals with established deadlines.

1 (1321) p. 34: A detailed time schedule and flow chart of the work process would clarify the discussion of Adaptive Management Program nut and bolts that need to be drawn up.

4 (0824) Specific resource standards should include, but not be limited to: surface area and volume of beaches; backwaters; riparian vegetation zones; population of endangered and threatened species; temperature, turbidity, nutrient load, and other characteristics of water quality; and standards for cultural sites in FEIS.

237 (0118) The Adaptive Management Program should include specific, measurable goals for protection and restoration of each of the resources in the canyon in accordance with Grand Canyon Protection Act and: or process to establish standards. Without these, it is inadequate.

1 (1933) The goal of the long-term monitoring and research and Adaptive Management Program must be to redesign dam operations in a holistic manner, to look at all the parts and their cumulative effect on the whole. Look at linkages between sources and sinks, engineering values and ecological factors, recognize the spatial scale of the resources, and maintain flexibility to arrive at the best solutions. (Bralver)

Frequency (I.D. Number) Comment

5 (0125) Form a management plan that would consider the well being of Grand Canyon National Park primary.

129 (0395) Adaptive Management Program should be scientifically based: include scientists.

20 (0127) Provide an adaptive management plan to ensure restoration and protection based on science rather than politics.

14 (0419) Adaptive Management Program needs to continue scientific research.

2 (1260) Using scientific data and Adaptive Management Program, Reclamation may find op. that does minimum harm to environment and all competing human interests.

8 (0117) The Adaptive Management Program should allow for long-term quantitative analysis.

7 (0119) Monitoring for adaptive management should be built on quantitative standards on which long-term data sets can be built and avoid non-quantitative data.

2 (0971) Adaptive management must remain open to new technologies, new ideas, and changed hierarchy of values mandated by Grand Canyon Protection Act.

1 (0972) Dam operations, management objectives, and scientific measurements are critical elements of adaptive management loop.

2 (0473) Adaptive Management Program must take into consideration all impacts on ecosystem in Grand Canyon, not just dam operation (i.e., visitors, recreation, etc.)

1 (0430) Excessive micro-management of resources should be avoided, but bold measures should be taken if necessary to properly macro-manage the system.

1 (1960) Adaptive Management Program should be two tiered forum.

1 (1322) p. 34: Best arrangement of work group would be a two-tiered forum.

97 (0387) Explain the role and make-up of adaptive management groups and independent scientific review panel in final decision-making process.

1 (2095) p. 34: The second tier would include the larger number of agencies and interests referenced in the DEIS. However, the FEIS must clearly define the interested publics, how many seats will be available to them, and how they will be selected or appointed. The second tier group would develop annual and long-range management resources objectives, proposals for long-term monitoring, and proposals for modifying dam operations and other mitigation in response to findings of the monitoring program. The proposals developed by the second tier group would be finalized and submitted to the Secretary by the first tier group in its role as a Federal Advisory Committee. Monitoring, long-term data management, and the scientific review process must be clearly established. The relationship between adaptive management, resources management objectives, long-term data management, and the scientific review

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process must be clearly established. Second tier Adaptive Management Work Group would be responsible for developing management objectives. (Navajo)

18 (0867) Adaptive Management Program work groups and technical groups need to be kept at a workable size.

1 (1018) Adaptive Management Work Group and Technical Work Group as presented are too large to do any actual work in real time.

1 (0970) Not realistic to separate members of Adaptive Management Team from political and economic needs of constituencies or their work from outside political criticism, support, or agendas; concept, structure and participants in adaptive management must be empowered to make tough decisions supported by solid science and measurable goals in FEIS.

5 (1122) Endorse 25 person Adaptive Management Work Group, including representatives of 7 Colorado Basin states, 12 cooperating agencies, 2 seats each for power contractors, environmental interests, and recreational interests.

5 (0669) Representation in work group of public and private water and power entities should not exceed those allocated to representatives of cultural and downstream resources.

1 (1410) Critical for proposed members of Adaptive Management Work Group to participate in development of Adaptive Management Program prior to FEIS.

2 (0484) No provision to include locally elected officials in the Adaptive Management Work Group. We request representation.

1 (1406) If the states are not allowed to participate in Adaptive Management Work Group, then citizen water groups should have representation.

1 (2129) p. 34, Column 2, ¶ 3: Given the disparity of agendas each committee member is likely to pursue, this kind of arrangement would likely result in dramatic swings in operations over time. Not only would power contracts suffer from such large swings in operations, but ecological conditions downstream would be harmed. Non-operational mitigation should be used where operational mitigation would be either ineffective or less cost-effective, after considering costs to all resources. In either instance, to maintain efficiency, non-operational mitigation should be part of the overall management process.

1 (1232) Participation of non-government members should be encouraged by creation of fund provided by water and power users and administered by public agency.

7 (0668) Non-government member of work group should be reimbursed for direct and indirect costs of participation. (Precedent for same exists.)

3 (1074) The Work Group should be responsible for an annual report to lead official detailing the Adaptive Management Program process to include (at a minimum) a list of current scientific studies, the principal agency or researcher, the monies expended on each, and

Frequency (I.D. Number) Comment

interim reports by principal investigators. An annual report by the ISRP should be attached, and all reports should be made public.

5 (1121) Adaptive Management Program Work Group would be an advisory and not executive body; would submit recommendations to senior Department of Interior official who would make decisions and take actions in compliance with Grand Canyon Protection Act.

5 (1073) The working group should be responsible for carrying out the Secretary's consultation obligations under Grand Canyon Protection Act.

1 (2099) p. 36: Paragraph 3 should clearly state that the Adaptive Management Work Group develops proposals for modifications of dam operations. These proposals would then be subject to the formal consultation process required by the Grand Canyon Protection Act. A distinction between the consultation requirements of the Grand Canyon Protection Act and Adaptive Management should be made. Adaptive Management Program must comply with the Act, but the Adaptive Management Program should not be intended to fulfill the consultation requirements of the Act. The Adaptive Management Program would be conducted in the full light of public participation, and disclosure and recommendations that are developed by the process would be the subject of consultation with the public as required under the Act. Funding is a prerequisite to success of Adaptive Management. Anticipated funding sources should be described. (Navajo)

1 (2094) p. 34, Page 34, Paragraph 7 and 8: The list of responsibilities for the Adaptive Management Work Group is vague and neglects to specify to whom the Adaptive Management Work Group answers to and to whom the products of the Adaptive Management Work Group are submitted. The description of the make-up and responsibilities of the Adaptive Management Work Group must be expanded and made more specific. In order to be successful, Adaptive Management Program must have a representative working body that directs and oversees implementation. The Adaptive Management Work Group should be that body. The number of potential participants listed in the DEIS is too large to function as that working body. We recommend that the two-tiered system be developed further. The first tier would be a chartered Federal Advisory Committee and would include those agencies with direct, legislated management responsibilities. The first tier group would be primarily responsible for tasks that entail detailed process and decisions, such as directing the Technical Work Group, finalizing and forwarding budget recommendations to the Secretary, and developing and finalizing annual reports. (Navajo)

1 (1409) Adaptive Management Work Group must consider all scientific, economic, and Law of the River issues in its evaluations and recommendations for operational changes, and must be willing to adopt less restrictive as well as more restrictive measures and operating criteria.

1 (1750) If Work Group is created, all meetings should be open to public attendance and participation, with prior mailing notice.

2 (0705) Eliminate Adaptive Management Program Work Group and give duties to independent scientific review group and different form of consultation.

8 (0667) Working group should make decisions based on consensus of its members.

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1 (1155) Studies and research not covered by Grand Canyon Protection Act may be housed with the Work Group, but should be funded by the agency requiring the study.

2 (1158) Work Group should forward recommendations to the Senior Official based on an 85% vote of all 25 members. Experience shows that consensus does not always reflect a full count nor a true "aye" or "nay."

10 (0122) The composition and role of the Technical Advisory Panel should be clearly spelled out.

1 (1152) Proposals for changes in flow regime to benefit resources should be submitted to Independent Scientific Review Panel and Work Group at beginning of each operating cycle by Technical Work Group.

1 (1149) Technical Work Group will define criteria and standards for long-term monitoring: i.e., what each agency needs to know to manage the resource referring to critical attributes of resource priorities defined in DEIS.

1 (1151) Technical Work Group could and should form sub-groups to deal with specific issues, such as humpback chub monitoring.

1 (1020) Who would fund technical work group?

1 (2130) p. 35, Column 1, ¶ 1: The information base described is too narrow to provide a realistic data set for the Adaptive Management Program. All resource uses and impacts must be included in the data base. This includes water and power supplies and demands. This way, Adaptive Management decisions will reflect all society's choice on dam operations rather than only one or two segments. Long-term monitoring and research also should look at the power system as an integral part of a total energy supply program, not just the economic aspects. Also, the entire water supply system and the impacts of dam operational changes on the supply should be monitored.

1 (1153) Re: Technical Work Group, requests for changes in flow regime should identify the resource that will benefit, how it will benefit, length of research needed to determine if expected change was achieved, and how many other resources would be affected.

1 (1961) The technical work group should include a member of the public, a student volunteer, member of the academic community, or a representative of an environmental organization.

1 (1150) All resource management agencies should be involved in monitoring and research at the technical office to some degree, including Arizona Game & Fish and Indian Tribes.

1 (1751) Independent scientific review panel of Adaptive Management Program is a necessity.

5 (1075) The Secretary of Interior should appoint the members of the ISRP from a pool of qualified candidates recommended by the National Research Council.

Frequency (I.D. Number) Comment

1 (1719) USGS and/or NBS should have a role/lead in operation of Independent Scientific Review Panel: Adaptive Management Program.

1 (1753) Besides scientific review panel, anyone requesting should be allowed review and comment on research proposals; should not be closed as sensitive discussions : documents in ongoing process.

1 (1157) Independent Scientific Review Panel will send reports of monitoring and research and recommendations on a regular basis to the Work Group and Senior Official.

1 (1752) Independent scientific review panel should review final resource reports, research proposals, and be empowered with authority to accept or deny a research proposal.

4 (1078) The ISRP should prepare an annual report on the state of long-term monitoring and research for the Secretary of Interior and distribution to public.

1 (1869) Adaptive Management Program should be reviewed annually and more intensively at 5-year intervals by an independent scientific committee.

5 (1077) The ISRP should be responsible for originating, after consultation with the Adaptive Management Work Group and Technical Work Group, the long-term monitoring plan, budget, and research program.

4 (1123) The Independent Scientific Research Panel should be empowered to make recommendations to the Adaptive Management Work Group and the senior Department of Interior official concerning modifications in dam operation based on information developed through monitoring and research.

1 (1024) Costs and products of existing National Research Council committee should be specified in FEIS in order to provide some guidance for what an Independent Scientific Review Panel might cost and be expected to produce.

1 (1023) Proposed Independent Scientific Review Panel should be coordinated with Committee to Review Glen Canyon Environmental Studies, Water Science & Technology Board, Commission on Geosciences, Environment & Resources, and National Research Council.

1 (2098) p. 32, Paragraph 2: An independent scientific review panel is warranted and necessary. However, the panel must be limited to evaluations of technical issues and scientific credibility and not to review proposals, analysis or conclusions with regard to appropriateness of management goals or political agendas. This, in fact, has been the case in specific instances with the review provided by the Glen Canyon Environmental Studies Review Committee of the National Research Council. This occurred to such a degree that Reclamation was, at the insistence of the Cooperating Agencies, required to correct the National Research Council with regard to the scope of its charter and comments.

4 (1076) ISRP should report directly to the same senior Department of Interior official to whom work group reports.

Frequency (I.D. Number) Comment

1 (1156) Independent Scientific Review Panel will assure that monitoring achieves the goals of the resource agencies.

c. Definition and Organization of LTM&R

2919 (0311) Long-term monitoring of the affected Colorado resources is essential.

20 (0225) There must be an ongoing process to monitor what happens in the Grand Canyon.

1 (1703) There is still much to be learned from research of Colorado River corridor through Grand Canyon, especially in life sciences area.

18 (0224) Ensure that the environmental monitoring continues indefinitely.

13 (0238) We are in favor of monitoring and research and a long-term river management plan.

1 (1055) Long-term monitoring and research needs to be ongoing for the life of the Glen Canyon Dam with a budget that will be adequate and continuous for the life of the project.

2 (0368) Cooperating agencies all agree that there should be a long-term monitoring and research program that allows consultation by all interested parties.

6 (0232) The EIS should ensure that monitoring, research, and enforcement plans are in place.

1 (2096) p. 34: It should be clearly stated that Adaptive Management is based on the conclusions of scientific inquiry that is conducted in the long-term monitoring program. Long-term monitoring is to be designed to provide the information that the Adaptive Management Work Group requires to determine if management objectives will be achieved. The purpose of the long-term monitoring program will be to provide specific information to Adaptive Management Work Group and not to conduct research or monitoring that does not provide direct information regarding the achievement of management objectives. Long-term monitoring would be conducted by the Technical Work Group. Because the purpose of long-term monitoring is to provide information useful to management, the Technical Work Group would be under the direction of the Adaptive Management Work Group. The discussion in paragraph 8 regarding the Technical Work Group should incorporate the above points.

8 (0652) Monitoring and research needs to receive more detailed discussion in EIS.

25 (0749) Monitoring and research must be clearly designed and efficient in collection of data and use of financial resources.

3 (0293) Long-term monitoring and research should be efficient, cost effective, and non-intrusive. Involving river guides would help meet these criteria.

4 (0731) Monitoring and Research program must be based on specific, achievable goals of the Adaptive Management Program.

Frequency (I.D. Number) Comment

4 (0750) Review: address: adopt recent National Research Council recommendations in revising monitoring and research plan and authorize it in ROD.

1 (0864) Differences in monitoring and research should be stressed.

2 (0223) To assure independence, monitoring should comply with the Adaptive Management Program.

25 (0236) Base the monitoring program on scientific evidence that is insulated from political pressure.

1 (0977) All future research should be keyed to the Adaptive Management Program.

1 (2297) A24, ¶ 2: All participants also must be required to have their protocols for data collection and analysis internally and externally reviewed. All sampling protocols must be set before the program begins. In addition to protocol for personnel, there needs to be a comparable protocol for equipment used for sampling, storage, treatment, and analysis (e.g., comparable laboratory analytical and detection levels, etc.).

1 (1930) The long-term monitoring and research outlined in the FEIS should include provisions for periodic review by public and scientists.

1 (1059) There should be a way to scientifically measure the results of the research done for Adaptive Management Program.

10 (0283) Ensure that studies are based on solid scientific research programs made credible through broad peer review.

1 (0802) There should be a published review of ongoing monitoring every 3 to 5 years.

8 (0825) Adaptive Management Program must be subject to scientific review by National Academy of Sciences.

4 (0754) National Research Council should periodically review work of independent research groups.

3 (0753) Secretary of Interior should appoint independent research group to oversee monitoring and research process and mandate of Grand Canyon Protection Act.

5 (0687) Too much science going on in the canyon.

38 (0231) The intrusiveness issue must be dealt with. There should not be visible signs of the scientific studies in the canyon. The object is to protect and preserve the canyon, not decorate it with tale-tell signs of science.

2 (0230) The long-term monitoring program should include a constituency panel that advises the scientific community on what level of intrusion is acceptable.

Frequency (I.D. Number) Comment

2 (1057) Impacts of research during the GCES have been greater than necessary because of lack of safeguards and coordination.

3 (1056) Minimizing impact of long-term monitoring and research would include things like combining multiple studies into one trip, minimizing camps set up in the canyon for monitoring, and reducing visual and other impacts of research.

27 (0411) Adaptive Management Program science should put reasonable limits on funding and number of research trips.

1 (2277) A9, ¶ 2: You describe the addition of another gage upstream of Nankoweap Creek as representing a "significant increase in the impact." Is this personal judgment: opinion or has an EA: EIS already been written for this gage? Why is this cable, when viewed with all others, considered a significant increase?

1 (2278) A9, ¶ 3: This paragraph suggests continuing a research effort within the program. This suggestion seems out of place. When research is completed and the model is implementable, it could be considered for inclusion. Meanwhile, this effort, like possibly several other research efforts that could be used to reduce monitoring intrusions, should be funded outside the program until the technology: methods: relationships are proven.

1 (2281) A10, ¶ 4: Agree with assessment limiting monitoring of tributary conditions. Program suggested in paragraph A-10 inappropriate and inconsistent with this. Agree tributaries should be viewed as inputs to mainstem and doubt useful as control sites. Conditions dramatically different in tributary waters from those in mainstem. Attempting to use to assess subtle differences between operational and non-operational conditions destined for failure. Best control may be "baseline" conditions established under GCES II. Attempting to model riparian vegetation outside influence of mainstem is questionable. Embarking on commitment to establish communities as reference for changes in mainstem communities risky. Conditions in tributaries probably near pristine, but riparian community along mainstem has changed dramatically since dam closure and continues to change. (CREDA)

1 (2279) A10, ¶ 1: Adding a station on Moenkopi Wash, if done, should be part of a research effort and not covered in the program. The frequency of scientific monitoring in the Canyon suggests to me that staff gages or surveyed, natural marks may be feasible in many cases to determine tributary flows, especially if easily accessible. Has this been considered?

1 (2288) A18, ¶ 4: In areas with abundant camping areas, it may be possible to put select beaches off-limits to camping as controls to help determine recreation impacts. The less invasive air photo and video imaging strategies should be emphasized in lieu of manpower intensive, on-the-ground survey techniques. Also, you could monitor recreation impacts by preventing usage of select camping beaches in areas with nearby alternatives and thereby provide control sites.

1 (2293) A22, ¶ 3: Your second sentence fails to recognize other influences on the Colorado River like dam closure, Annual Operating Plan, recreation, cultural, etc. You have suggested a complete weather station at Lee's Ferry, yet one exists about 15 miles away in Page and

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could be supplemented by limited on-site data. Also, we think your idea for a full climatological station at Indian Gardens should be dropped, as differences between Phantom Ranch and Indian Gardens are probably too subtle to be of much help in making decisions regarding dam operations.

6 (0775) Researchers should comply with no-motor season from 9: 15 to 12: 15.

1 (1927) All data from the long-term monitoring and research must be made available to the public at no cost, or for no more than the cost of reproduction, perhaps over Internet or National Information Infrastructure.

1 (0803) Sharing of data among all contributors must be mandatory. Non-compliance would revoke future funding and participation, including impacts.

2 (0866) Monitors and researchers must be held accountable for making data available in a timely and organized manner.

4 (0237) Monitoring should be built on quantitative standards on which long-term data sets can be built, such as count the number of beaches restored.

4 (0235) Monitoring should avoid non-quantitative data whenever possible.

1 (2298) A24, Paragraph 4: Process for data interpretation should be broadened. Peer review needed before reaching decision-makers. Other scientists not collecting data for specific monitoring element could be involved with data interpretation as check on personal bias and to assure proper conduct of scientific methods. Program should become routine and continuation of baseline information collected in GCES I & II. Fail to see where significant "original" information will be generated nor why reasonable to allow its publication before "public" has access. Too much riding on accurate data interpretation to allow any scientist to bypass peer review and heavy scrutiny of information. Agencies responsible: paying for should decide when data are released. Suggest each monitoring program prepare an annual report including data; any activity not relevant to reports should not be funded by Program. (CREDA)

1 (2299) A24, ¶ 5: The present level of confidentiality appears to be an arbitrary, subjective standard. We suggest the criteria for determining conditions under which confidentiality is needed should be openly debated so the final level is agreeable.

1 (2300) A24, ¶ 6: Monitoring is likely to be conducted by entities such as Arizona Game & Fish Department, etc. You should describe what each entity should do with their copies or originals of records and how long they should be retained.

1 (2301) A25, ¶ 1: Determining how long information should be archived is a difficult task, but some attempt should be made as we move into this Program. The Program should be able to incorporate new methods of data retention as technologies are developed and old methods become obsolete. This will allow old style records, which may be bulky, to be discarded.

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1 (2302) A25, ¶ 3: The data manager must be prevented (e.g., contract, etc.) from jeopardizing long-term data management through such things as changes in their future program policies and priorities (e.g., reassignment of employees to higher priority jobs and thus unavailable for data management, etc.). Also, the Program should safeguard against monitoring data becoming the data manager's data by virtue of their role as manager. This would prevent the entity's policies from interfering with data access by others in the Program.

1 (1934) Science should give us value-free information. But sometimes science comes to us with meanings that make the information more or less suitable for information processing, better or worse for different value systems. Strive for value-free information.

1 (1021) Will Adaptive Management Program and long-term monitoring and research subsume or co-exist with GCES?

1 (0966) Acknowledge political and administrative problems of ongoing research and costs associated with it makes narrowing focus attractive, but caution that incomplete data on resource inventories, projected and actual impacts, are function of late inclusion of tribes.

1 (0965) While tribes want to increase scope of the long-term monitoring and research goals, they also want to minimize intrusion into their Federal trust responsibilities. Recognize possible conflict and pledge cooperation.

3 (0940) Warm water releases from dam should be conducted as part of Adaptive Management Program implemented after ROD to enhance flexibility.

1 (2294) A23, ¶ 3: Some flexibility is needed to permit "new" projects, but also to drop projects to respond to data analysis suggesting surrogate: parallel indicators may suffice. This could help reduce impacts to resources due to heavy monitoring. This section could suggest a good feedback mechanism that will be part of the Adaptive Management process.

1 (2296) A24, ¶ 1: This paragraph describes a research or study outline and should not be part of long-term monitoring. Methods initially used should be existing, fully-tested ones that may be modified later based on research results. Also, your statement implies methodologies already used in GCES Phase I and II still may not be fully tested. If so, how can we conclude anything about effects of dam operations for the EIS if these same methods were used? If new methods are proposed, how comparable will they be to existing methods, and what is the rationale for changing? This should be clarified in your rewrite.

103 (0227) FEIS: ROD should guarantee and explain adequate funding for monitoring and research programs.

1 (1037) Funding for continuing research and monitoring should be secured to ensure against undesirable data gaps following ROD.

2 (0228) The Grand Canyon Environmental Studies Group needs to be guaranteed its $10 million annual budget.

2 (0865) All monitoring and research should be open to competitive bid.

Frequency (I.D. Number) Comment

1 (1154) Long-term monitoring and research as required by Grand Canyon Protection Act must be considered part of the cost of operating the dam and funded annually, but not seen as endless supply of funds for peripheral research and studies.

1 (2295) A23, ¶ 4: We realize the intent to develop this Program scientifically (i.e., without cost considerations), but money is a real constraint when designing such programs. Some comment on budget constraints is appropriate at this location since this resource will set the limits on what can be accomplished.

1 (1116) Long-term monitoring and research must not be construed as carte blanche for science: government to run amok. Cost must be reasonable to limit likelihood of legislative backlash under future Administration.

1 (2312) Personnel from supervisory agencies are justifying additional employment and expense to taxpayers by argument that continued monitoring and analysis is required.

2 (0804) Use of independent researchers: contractors should be encouraged.

7 (0229) Monitoring should always be open to and give weight to scientific and public participation.

1 (0426) U.S. International Border Water Commission would like to offer our expertise to the work group that will coordinate further monitoring and studies to include the protection and monitoring of bi-national resources.

1 (0968) Administrative coordination of long-term monitoring and research must be defined in final EIS to prevent continued dispute. Recommend three levels: 1) scientific with Research Advisory Group and Research and Monitoring Integration Team, 2) scientific oversight with Independent Scientific Oversight Group, and 3) administrative, data base maintenance and report development that would have Administrative Coordination Group, a team for data management and organization, and a unit for Native American coordination.

2 (0661) Begin studies to monitor what changes produce what results to be incorporated in Adaptive Management Program.

15 (0756) Science must provide convincing evidence that changes proposed by Adaptive Management Program will protect and improve downstream resources.

4 (0233) Ensure that appropriate changes are implemented as soon as different action is indicated.

3 (0752) Monitoring and research plan should identify research priorities and contingency measures.

8 (0765) Monitoring and research plan should define frequency, location, and methods of monitoring and provide estimates of costs.

Frequency (I.D. Number) Comment

1 (1159) Management objectives reported in DEIS (Appendix 4-6) do not give direction about what type of monitoring is needed to help with these objectives. Need specific goals and objectives to be associated with critical attributes in DEIS.

3 (0675) Long-term monitoring and research must be comprehensive, flexible, and inclusive of ongoing research.

1 (1929) Monitoring and research must be comprehensive, flexible, and inclusive of ongoing research.

1 (1821) Program for scientific monitoring and use of resulting baseline data must be spelled out and rubricated in EIS before Adaptive Management Program is accepted as a viable practice.

1 (2274) A5, ¶ 1: This objective is in general disagreement with actual practice. The ecosystem today as reflected in increased waterfowl, riparian vegetation, riparian wildlife, aquatic production, and a change in aquatic fauna to cold water forms is generally supported by the NPS.

1 (2355) A5: "The NPS ... has management objectives based upon both the ... post-construction."This pre-construction ecosystem objective is not mentioned in Chapter II and is not studied in any section of the DEIS. Is this some kind of coverup?

1 (2275) A7, ¶ 1: Monitoring should be designed to help make decisions regarding dam operations, not to monitor all discharges that may possibly occur below dam (e.g., maximum probable flood). Flow figure of 100,000 cfs exceeds operational flows by over 3 times and seems excessive for monitoring impacts to riparian vegetation, cultural resources, and sediment. If this program is truly intended to monitor just long-term effects of dam operations, then it should be limited to 31,500. If program is intended to also monitor reservoir operations, then 100,000 is justified. Monitoring program then should be renamed to reflect the intent.

1 (1649) A14: It is not clear which of the biological parameters would be developed in the long-term monitoring program and which are part of the existing NPS monitoring.

5 (0300) Water temperatures should be monitored.

1 (1928) Further research and monitoring of non-use values must be part of the long-term monitoring and research and Adaptive Management Program.

1 (0793) Monitoring and research needs to establish what native fish need and how to protect cultural and historic sites.

1 (2333) p. 86: GCES sediment dynamics researchers disagree on the likelihood of a long-term sand balance downstream of the Little Colorado River. Continued monitoring of riverbed, sandbar, and beach sand below the Little Colorado River must be part of the long-term monitoring and research and Adaptive Management Program.

Frequency (I.D. Number) Comment

1 (1013) Text of document and Appendix should state that long-term monitoring of Lake Powell geochemical water processes and circulation is necessary.

1 (1014) Appendix A indicates that long-term monitoring and research would end at Separation Rapids, and we believe that it should terminate at Grand Wash Bay (approximate River Mile 284) because of flow influences on riparian resources and sediment loading all the way down to Pierce Ferry.

1 (1012) Long-term monitoring of Lake Powell above the forebay of the dam is critical to a thorough understanding of downstream issues, particularly if selective withdrawal structures are installed to warm the water downstream (Appendix A).

1 (2273) A4, ¶ 1: We agree with this assessment. It seems inconsistent to offer this when later you talk about monitoring effects of 300,000 cfs flows on cultural sites when flows under maximum dam operations are around 31,500 cfs.

1 (2280) A10, ¶ 3: The suggestion to monitor water temperature and conductivity seem reasonable, but pH is questionable. This parameter is not likely to be of much use as an indicator of changes in water quality due to dam operations, and therefore of little use in making suggestions for change to dam operations. Total Organic Carbon could be substituted for particulate and dissolved organic matter.

1 (2283) A12, ¶ 1: Habitat requirements should be established by research and not be a monitoring parameter. Instead, we should be measuring conditions (e.g., flow, velocity, depth, substrate size, etc.) in the field that determine if habitat requirements are being met.

1 (2284) A14, ¶ 4: Riparian vegetation outside the influence of the mainstem is a doubtful model. Differences in mainstem water conditions separate from those influenced by dam operations will remain dramatically different from tributaries. Therefore, to embark on a long-term commitment to establish these communities as the reference for autogenic changes in the mainstem communities seems risky. Conditions in the tributaries are probably near pristine, but as we all know the riparian community along the mainstem has changed dramatically since dam closure and continues to change. Riparian vegetation monitoring in quadrants along tributaries is needed in this program only if influenced by dam operations or a source of input to mainstem, but not as a monitored unit in itself.

1 (2285) A15, ¶ 3: The relationship between trout and bald eagles at Nankoweap Creek is now known sufficiently well and should be dropped as a monitoring parameter; however, an annual bald eagle survey at the creek seems appropriate.

1 (2286) A17, ¶ 3: The purpose of this program is to gather information to be used by decision-makers. It is not intended to insure "remedial actions [are] taken when required." Also, this paragraph suggests representative samples of sites should be chosen from categories up to 300,000 cfs. Are you suggesting only samples of sites in category 1, or are you including categories 2 and 3 as well? If all categories are included, this does not seem to be consistent with your suggestion of including "sites with evidence of being impacted (second paragraph, second sentence)."

Frequency (I.D. Number) Comment

1 (2289) A19, ¶ 1: There is extreme difficulty in designing, conducting and interpreting surveys of recreationists' values. For the majority of white-water users, a trip is a once-in-a-lifetime experience and what they go through on the trip represents the extent of their knowledge. Preferences, perceptions, attitudes, etc., of these one-time users is highly influenced by boatmen. This influence suggests value surveys should continue to be included only as a potential research topic and left out of long-term monitoring for now. Also, the suggestion to use research already conducted on this subject as the baseline may be premature since this work may be influenced by boatmen.

1 (2290) A19, ¶ 4: We assume you were proposing in the second sentence an assessment of power user attitudes, perceptions, and preferences for inclusion in the program. If so, what is the baseline study of these user values?

1 (2292) A21, ¶ 6: We agree with your assessment regarding limiting monitoring of tributary conditions. Therefore, the program suggested on page A-10 is inappropriate and inconsistent with this assessment to consider them as controls for comparing mainstem conditions.

1 (2282) A10, ¶ 5: Aquatic food base sampling of tributaries should be limited to input samples only. For this program, we are only interested in what comes into the mainstem and not in the processes that produce the input. Measuring dominance could be broadened to include assemblages.

1 (2276) A8, Paragraph 1: Monthly sampling may be needed initially but this frequency probably is too high for the long-term. For long-term sampling, seasonal values (4 times per year) should suffice to help in determining trends for purposes of deciding on dam operations. Chemical parameters should include trace elements and metals that may effect organisms at extremely small concentrations and are important in biochemical reactions. Monitoring for these should be done no more than quarterly. Fish distribution could be added to the list of biological parameters since there are indications past threadfin shad numbers in winter months (when the population is more evenly distributed in the water column) may have been responsible for the tremendous trout growth below the dam.

1 (2291) A21, ¶ 5: One problem perceived with monitoring unregulated analogues is they will not parallel the Grand Canyon. The example of Cataract Canyon seems plausible but nearly every major tributary upstream of Cataract is regulated, except the Yampa River, making it a questionable analogue. The Grand Canyon system is not natural, and therefore should not be compared with an unregulated system. We may have to use other criteria, such as conditions in GCES Phase II, to compare future conditions with and determine trends. Unfortunately, problems associated with Phase II make even this a marginal reference.

2. Beach/Habitat Building Flows (B/HBF) & Habitat Maintenance Flows (HMF) - 445 statements dealt with this subject.

a. Definition, Purpose, and Need

6 (0575) DEIS is deficient in its descriptions of beach-building habitat flows and their treatment in the future.

Frequency (I.D. Number) Comment

93 (0332) Habitat building flows and habitat maintenance flows not adequately described in the DEIS, including risks to ecosystem and power. FEIS should more fully discuss all issues and impacts.

1 (1043) FEIS should contain additional information on beach: habitat building flows: specifically, whether the effects of a lower downramp rate (1500 cfs) would significantly differ from those of a 4,000 cfs downramp rate on such things as fish stranding, sandbar aggradation, etc.

1 (1680) Habitat maintenance flows were not included in ILFFA "in order to preserve the current interim operations for which nearly 2 years of data have been collected," but beach building flows are included for same alternative even though they also were not part of interim flows. If justification for this difference is the proposed "spike flow," it should be so explained. Changes suggested by cooperating agencies would also have modified interim flows.

1 (1323) pp. 36–37: Beach: Habitat building flows section is jumbled. The experimental flow scheduled for 1995 should be discussed in a separate paragraph.

1 (1440) p. 37: There is no outline of the scientific evidence for designing a useful beach-building flow; available research should be included in FEIS.

1 (2031) p. 203, Column 1, ¶ 3: It might be helpful to the reader if writers distinguished between the frequency and magnitude of beach: habitat-building flows (common element) and habitat maintenance flows. Both flow scenarios, which are mentioned several times in this section, serve to restructure backwaters. The reader could easily confuse the two and wonder why both are necessary for the Moderate Fluctuating Flow, Modified Low Fluctuating Flow, and Seasonally Adjusted Steady Flow Alternatives. The distinction can be reinforced in the individual discussions of these alternatives by referring to the frequency of beach: habitat-building flows.

1 (1989) p. 32: The logic for including habitat maintenance flows in the Seasonally Adjusted Steady Flow alternative, but not in the other steady flows, seems flawed to the Hopi Tribe. The purpose of the Seasonally Adjusted Steady Flow, as well as the other steady flow alternatives, is to keep the flows steady within seasons. In the first paragraph following the charts for both the Existing Monthly Volume (page 32) and the Seasonally Adjusted Steady Flow (see page 33), the goal of enhancing the aquatic ecosystem is stated and the habitat maintenance flow is an integral part of this. The habitat maintenance flow should be a common element to the other steady flow alternatives as well, or the reason for its exclusion better explicated.

8 (0685) Beach building flows should be timed to coincide with tributary flooding: be flexible.

4 (0747) Measures must be related to dynamic balance of sediment in system and not predetermined frequency.

1 (1596) p. 37: This discussion of beach: habitat building flows should state clearly that the pre-dam peak of the hydrologic cycle occurs in May or June.

Frequency (I.D. Number) Comment

1 (1666) p. 37: There is no logic explaining the avoiding of beach: habitat building flows during high reservoir conditions. Wouldn't that be the best time to release higher flows to aid in prevention of unanticipated spills? Clarify.

1 (1325) pp. 36–37: Flows should be scheduled only in the spring for fish biological reasons.

1 (2308) Beach building flows should be scheduled when additional benefit to recreation can be maximized (summer rather than early spring).

1 (2311) Flood rate (every 5 years) can vary between 40,000 to 8,000 cfs. The increase and decrease rate should not be more than 4,000 cfs: day.

1 (0686) Waive limit on up-ramp during beach building flows.

1 (1324) pp. 36–37: Ramp rates should be as first presented—2,500 cfs per hour up and 1,500 cfs per hour down.

91 (0651) Beach building flows are in fact experiments and should be conducted as such.

1 (1496) Summary p. 11, last paragraph: The inference here is that beach building flows have already been determined to be effective, and that they will be an integral part of adaptive management. We suggest the addition of a qualifying statement saying that beach-building flows will be tested and retained if successful.

1 (1534) p. 52: Again, there is a heavy reliance on habitat flows when there is no evidence that they will work as expected. Also, maintenance of dynamic marshes was happening under normal power operations, contrary to the statement here.

1 (1841) (Habitat maintenance flows) Since no tests have yet been run, assigning maximum discharge: recurrence intervals for habitat maintenance floods inappropriate at this time.

1 (1873) Summary p. 11: Beach: habitat building flows require an integrated study program linked to the long-term monitoring program and definitively incorporated into the Adaptive Management Program.

3 (0485) Public must be informed of the timing of beach building flows in advance.

1 (1494 Summary p. 11, ¶ 1, under "Beach: Habitat Building Flows": Insert "riparian" between "unwatered" and "vegetation." We disagree with the statement that backwater habitats would tend to fill in under any alternative. History has demonstrated that backwaters not only form, but are maintained under normal fluctuating flows, and would be expected to do so under the Maximum Powerplant Capacity Alternative as well.

1 (1495) Summary p. 11; main doc. p. 36, ¶ 2, under "Beach: Habitat Building Flows": We suggest that the word "designed" be replaced by "intended." As with other aspects of the common elements, the usefulness of beach: habitat building flows are subject to testing and verification. It may be the benefits will not be as great as anticipated, and will be brief at best.

Frequency (I.D. Number) Comment

1 (1769) It may be possible with beach building flows to maintain backwaters at higher level than 11,000 cfs.

b. Problems, Deficiencies, and Negative Impacts

3 (0904) Habitat building flows and habitat maintenance flows are high risk: low return ventures; probably unnecessary for long-term sustainment of beach sand deposits.

89 (0794) Habitat building flows and habitat maintenance flows (including plan and goals) should be submitted to Adaptive Management Program review before being done.

1 (1170) There should be an "escape clause" during the implementation of habitat building flows in case monitoring shows unforeseen or unwanted effect on natural or cultural resources.

1 (2132) p. 37, Column 2, ¶ 1: Several drawbacks with the spring: summer season proposed should be explained in the final EIS. These include: 1) Humpback chub: Young humpback spawned in April–May do not enter river until about July or August. Young (< 200 mm) from previous years are near shore and susceptible to washout anytime. Also, young chub losses would increase at this time as they enter the mainstem from Little Colorado River. 2) Other Native fish: Young are along shorelines near tributary mouths in late May and early June and susceptible to washout. 3) Trout: Young trout are less susceptible to washout after April but basically no detriment to population is expected as stocking could supplement. 4) Southwestern willow flycatcher: Avoid nesting period, which begins in April. 5) Other riparian birds: Nesting begins in April with probable washout after mid-April. 6) Tamarisk: Tamarisk seeding and germination begins after mid-April and continues to about December. Also, by doing the experiment early, Tamarisk germination would not be helped by flooding. 7) Monsoon: Summer monsoon precipitation creates uncertainties and would complicate the experiment. 8) Recreation: There are larger numbers of summer rafters and anglers possibly affected by flows. 9) Cost: Western's Dave Sabo said this would pull water out of months when it is more valuable and put it in months where it is less. Their estimate of lost generation is $1.2 million for a 31,500 cfs flow experiment for two weeks and $2.1 million for a 45,000 cfs spike flow for one week. This estimate does not include cost for proposed steady flow periods before and after the spike.

1 (2049) p. 239, Column 2, ¶ 2: Habitat maintenance flows would provide high (30,000 cfs) steady flows for up to 2 weeks each spring...." On page 29 it is stated that the flows are within powerplant capacity (33,200 cfs) and 1 to 2 weeks in duration, with a footnoted caveat that the flows can be less when Lake Powell is not expected to fill. These sections should be made consistent. One of the stated benefits of habitat maintenance flows is to "provide unlimited tributary access..." Under most alternatives, the fish already have unlimited tributary access.

3 (0108) Do not feel that beach building flows are advisable as they may not rebuild beaches due to limited sediment availability and may cause more harm. Leave it to natural processes.

Frequency (I.D. Number) Comment

1 (1558) p. 193: Question the statement that beach: habitat building flows would not affect the long-term sand balance. More sediment will exit the system with a beach building flow than would occur without one.

1 (1804) Beach building flows not effective without sediment availability to reimburse sandbars, terraces and beaches.

1 (2131) p. 37, Column 1, ¶ 3: According to W. Minckley, we should expect to lose young humpback chub downstream to Lake Mead with these high flows but this should not hurt the population. We should expect to lose at least the 1992 and 1993 year classes (i.e., fish less than 200 mm). Young trout would be washed downstream, but stocking would compensate for these losses. The FWS would have to check "yes" for question #8 of the Categorical Exclusion Checklist, which asks if a listed species may be affected. Also, the FWS will be looking for an assessment of net habitat gains and losses. FWS consultation may be needed for the proposed high releases.

4 (0909) Young humpback chub and other native fish could be transported downstream and lost during flows of 45,000 cfs.

3 (0925) Can larval fish move from Little Colorado River to mainstem negotiating cold water, find backwater, avoid predation en route and in backwater, survive competition with non-natives and relocation during habitat maintenance flows and habitat building flows?

2 (1273) Impact to trout population of beach building flows (which could cause a change of quantity of algae); could be significant, including a die-off comparable to when Interim Operating Criteria hampered algae production.

3 (0910) Impact of habitat building flows and habitat maintenance flows on algae due to increased turbidity and reduced light has not been assessed and could be significant.

4 (0911) Impact of habitat maintenance flows and habitat building flows on nesting birds due to inundation of riparian vegetation has not been addressed.

4 (0912) Impact of habitat maintenance flows and habitat building flows on ground dwelling, nesting, and burrowing animals that invade areas to be periodically flooded has not been assessed.

2 (0908) Habitat building flows and habitat maintenance flows will encourage less woody and perennial vegetation.

3 (0907) Habitat building flows and habitat maintenance flows and steady flows will encourage riparian and wetland vegetation below NHWZ, but periodically flood them.

2 (0906) Lower maximum flows will reduce chance of survival of riparian vegetation by limiting water at times.

6 (0905) Habitat building flows and habitat maintenance flows and steady flows will eliminate new riparian condition (will remove new vegetation) created post-dam.

Frequency (I.D. Number) Comment

1 (1269) The experiment to test how high flows will move and redeposit sand will cost estimated $10 to $15 million, according to Western.

c. Legal Concerns

4 (0913) How does Reclamation justify inclusion of habitat maintenance flows and habitat building flows in set of alternatives when risks to environment are unknown, there is significant cost to power users, and violate existing law?

14 (0574) Law of the River does not allow flows greater than powerplant capacity, such as suggested beach building habitat flows; may require legislation to change.

2 (1263) Upper Colorado River Commission and Upper Division States adamantly oppose releases beyond power plant capacity and will resist to maximum extent possible.

1 (1411) Beach: habitat building flows in excess of powerplant capacity raise many issues that will need to be resolved by Basin States and U.S. government agencies.

3 (0942) Sand pumping discarded because "not compatible with NPS management policy," but habitat building flows and habitat maintenance flows retained despite fact that they violate existing law.

d. Alternatives to B/HBF and HMF

3 (0941) DEIS does not compare risks, costs, and impacts of sand pumping with high releases designed to accomplish the same thing, including power replacement costs, costs of experimental flows, etc.

e. Support and Reasons for Support

43 (0524) Support Beach Building And: or Habitat Maintenance Flows.

1 (1124) Support beach building flows because without the ability to deposit sand, efforts to slow erosion are doomed.

5 (0109) I support silt return that will minimize the effect the dam has on the canyon.

1 (1704) Support annual habitat maintenance flow whenever spring flood danger is minimal.

6 (0746) Support planned experimental beach building flows in spring of 1995 to see if pre-dam components of sediment can be restored.

2 (0679) Incorporate beach building flows in SASFA.

Frequency (I.D. Number) Comment

3. Emergency Criteria - 410 statements dealt with this subject.

a. Need

1 (1700) Use of emergency exception criteria is necessary.

5 (0515) Concur with need for emergency criteria.

1 (0468) There are times when emergency criteria could be critical to national security.

1 (0467) Emergency criteria for power generation should be included: should be reasonable, well thought out, and not do considerable damage to ecosystem.

2 (0132) I do not agree with the exceptions for research and power emergencies as they could undermine the improvements.

b. Definition

1 (1599) p. 40: Continuing the use of financial exception criteria for a 5–7 year period has not been included as part of the Preferred Alternative. FWS believes that continuing the use of financial exception criteria should be addressed in the Adaptive Management Program.

1 (2328) p. 39: Emergency exception criteria must be rigidly defined in the FEIS, along with realistic estimates of the frequency and duration of each type of exception. Limits on frequency and duration of electric-power system related emergencies must be imposed.

5 (0130) Concerned about the Emergency Exception Criteria and feel they should be defined more narrowly.

1 (1815) DEIS lacks detailed prediction of "emergencies" that would cause a rout in EIS dam management.

1 (1967) DEIS fails to describe whether Glen Canyon Dam has systems able to provide emergency assistance and the extent of its capabilities for emergency operations.

1 (1818) If emergency clause is included, any conflicts of Western's power marketing plans with EIS plans for canyon preservation must be addressed.

1 (2316) What is a "sufficient generating capacity" that could alter normal operations?

1 (1701) The development process for emergency exception criteria specific guidelines should include extensive public review and comment.

c. Limits

2 (1067) Limits on the frequency and duration of power system related emergencies must be imposed.

Frequency (I.D. Number) Comment

2 (1068) Financial exemptions should be eliminated from the FEIS and none allowed as of date of ROD.

1 (2329) pp. 39–40: Financial exception criteria must be eliminated from the FEIS; no financial exceptions should be allowed starting on the date of the ROD.

383 (0131) Reclamation should reject all changes or exceptions to the currently proposed flow regime unless they are scientifically justified as good for the Grand Canyon's natural resources.

4. Flood Frequency Reduction - 169 statements dealt with this subject.

a. Purpose and Need

5 (0571) DEIS is deficient in its description of flood frequency reduction measures. Why is there not a preferred option?

3 (1030) Evaluation of two options for reducing flood frequency is not included in DEIS, and the specific basis for the proposed option is unclear.

9 (0805) Need more in depth studies of flood frequency reduction measures and their impacts on resources upstream.

1 (1740) Estimates of costs for each of the proposed flood reduction measures and estimates of flood reduction benefits for each measure should be identified.

2 (0991) p. 36: The existing operation of Lake Powell (full pool at 3,695) should be recognized as a flood reduction measure already in place.

1 (1032) FEIS should describe potential impacts of flood frequency reduction measures to development of Navajo Irrigation Project.

1 (1160) Present Grand Canyon system cannot withstand unplanned flooding, which could scour sediment from the system.

1 (1487) Agree with your goal of avoiding unscheduled spills such as occurred in 1983; effective spill avoidance policy single most beneficial operating change that could be made.

2 (0431) The two proposed flood frequency reduction measures seem inadequate to protect riparian zone from destructive flows individually. Put both in place to ensure damaging spills don't occur again.

1 (1437) Flood control proposal may not have been subject to sufficient analysis; DEIS does not make a good case for such rigorous flood suppression. Flood flows at intervals closer than one century may be environmentally beneficial in maintaining channel configuration, re-figuring vegetation and beaches, and removing toxic sediments. Please analyze in FEIS.

Frequency (I.D. Number) Comment

3 (0901) Reducing flood frequencies further contradicts the natural forces that produced and maintained historic conditions.

2 (1595) p. 36: What is the flood frequency under the No Action Alternative? On page 172, flood flows in excess of 45,000 cfs are projected to be once in 30 years for the 20 year period and once in 40 years for the 50 year period. However, Table IV-1 shows that flood flows in excess of 40,000 cfs are expected 1 in 40 years for the NAA.

2 (0587) Flood frequency reduction measures should not impair the storage of water to meet long-term delivery obligations to Lower Basin.

b. Raising Spillways

39 (0133) Note that the raising of the spillways at the dam may trigger compliance with NEPA.

1 (2348) p. 175: Before the spillway gates are raised, affecting 3,710 acres upstream of Glen Canyon Dam, a full separate EIS must be completed.

1 (0990) p. 36: Increasing elevation of Lake Powell would have to receive further study before it could be implemented as a possible action.

2 (1029) Concerned about existing analysis of proposal to raise spillway gates by 4.5 feet; impacts not identified.

11 (0760) Don't increase the level of Lake Powell by raising spillways. It will cause harm upstream to things like Rainbow Bridge, habitat, etc.

1 (1872) Summary p. 10: Wouldn't raising the level of Lake Powell 4.5 feet for flood protection compromise the integrity of Rainbow Bridge? Wasn't that site guaranteed protection from the effects of Glen Canyon Dam?

9 (0811) DEIS does not address effect of raising spillway gates on Lake Powell cultural resources, riparian growth and other environmental concerns; must be addressed and presented for public review and comment.

1 (1092) If spillway gates are raised, how could vegetation and habitat potentially be affected in geomorphically different locations in an expanded Lake Powell (e.g., steep canyon walls, deltas, pool and riffle sequences in tributaries)?

2 (1161) Raising the spillway gates would require a cultural resources survey of the high water line of Lake Powell that would be costly.

1 (0989) p. 36: Raising level of Lake Powell has environmental impacts that have not been fully studied, such as recently documented endangered fish population using inflow areas of Lake Powell. Raising lake level would impact proposed endangered fish habitat.

1 (0988) p. 36: Raising level of Lake Powell has environmental impacts that have not been fully studied, like popular beach inundation and proximity of water to parking lots and

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building foundations, raising potential for storm damage, reduced use of launching facilities, loss of dry boat storage, etc.

1 (1384) DEIS contains no stress study to dam structure of raising the spillways 4.5 feet; .7 million acre feet significant weight in addition to maximum 22 MAF for which designed.

1 (1033) FEIS should indicate how high the spillway gates are above the ordinary high water line and whether fill material would be placed within the ordinary high water line to determine necessity for a § 404 permit and compliance with requirements of Clean Water Act.

4 (0902) Raising spillway elevation more desirable option than reducing capacity within Lake Powell.

10 (0572) Raising spillways is the best flood frequency reduction measure because it does not impact the state's apportionments and storage; maintains principal water conservation purpose.

3 (1120) Only if a further reduction in flood risk is desired should increased storage be considered as an addition to lowering lake level.

7 (1220) Proposal to raise spillway gates is unacceptable.

c. Change Releases to Insure Additional Storage

1 (1031) What would the environmental and economic effects be if flood storage were dedicated operationally?

1 (1162) The Grand Canyon Protection Act call to protect and improve values of Glen Canyon National Recreation Area would be better met by reducing the storage of the reservoir than by possibly raising shoreline levels.

2 (0806) More prudent to include additional amount of freeboard below 3700 ft. mark for flood control.

5 (1095) Support lowering level of Lake Powell as the preferred method to reduce flood frequency because it would lower the evaporative losses and increase annual releases.

3 (1118) Support lowering of Lake Powell as flood frequency reduction measure because either measure would serve that purpose.

3 (1119) Support lowering of Lake Powell as flood frequency reduction measure because reducing existing storage will not violate Law of the River (Marcus).

4 (1079) Support lowering level of Lake Powell as the preferred method to reduce flood frequency because it would decrease surface area of the lake slightly, providing protection for cultural and natural resources otherwise flooded or subject to direct access.

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6 (1096) Support lowering level of Lake Powell as the preferred method to reduce flood frequency because it would save the $3 million dollars that would be spent on new spillway gates.

1 (2326) p. 36: Flood frequency reduction must be done by reserving additional space in Lake Powell rather than raising the spillway height. A full separate EIS: NEPA: Clean Water Act: Endangered Species Act: Grand Canyon Protection Act review must be done if raising spillways is pursued. Should only be pursued if there is a large net positive impact on the downstream and upstream environment.

12 (0418) Maintain adequate flood capacity in Lake Powell through draw downs instead of raising the elevation of the spillways.

3 (0748) Current agreement on reduced volume of Lake Powell for flood storage should not be formalized in ROD.

5. Selective Withdrawal - 199 statements dealt with this subject.

a. Purpose and Need

1 (1399) DEIS might have been more complete if analysis of the potential costs, impacts, and benefits of selective withdrawal structures had been included.

1 (0107) Why is Reclamation not committed to construction of selective withdrawal structures?

1 (2125) Resolve questions surrounding selective withdrawal before embarking on costly and inconclusive steady flow experiments.

1 (1994) p. 39: The cost given for the multilevel withdrawal is estimated at $60 million. The economic cost for the fish flows could reach as much as $83 million each year above the cost of the low fluctuating flow for the five years that they are planned (see Table II-7). It seems to make more economic and biological sense to invest in the construction of the multilevel withdrawal structure prior to implementing steady flows that will have a far greater cost without being able to warm the river to the degree necessary to support endangered species reproduction in the mainstem.

1 (1327) p. 39: Do FWS and Arizona Game & Fish Department recommend studying feasibility of MLIS or recommend building it? How can they recommend without studying it first? Clarify.

1 (1097) Reclamation maintains that since increased water temperature would benefit both native and exotic fish, a multi-level intake system is not advisable, but has not demonstrated that the net effect of increased temperature would not be beneficial to endangered native fish.

1 (1299) Discussion of selective withdrawal structures could benefit from inclusion of explanation of why reproduction of native fish in the mainstem is important for recovery and enhancement of native fish and role it could play in elimination of jeopardy.

Frequency (I.D. Number) Comment

3 (1298) Benefits to native and non-native fish predators, as well as the risks to endangered fish of selective withdrawal structures, must be assessed simultaneously.

1 (1498) Summary p. 13, ¶ 2: Why is there no mention of a potentially greater risk from enhancement of conditions for non-native fish already residing in the river in the Grand Canyon and competing with native fish, rather than sole mention of the improvement of conditions encouraging migration of predators from Lake Mead?

2 (0105) Will structures at Flaming Gorge be evaluated and a decision made on whether to recommend them for Glen Canyon?

1 (1598) p. 39: Please acknowledge that FWS has made recommendations toward further understanding and developing of procedures to determine the feasibility of the multilevel intake structure in both the draft FWS Coordination Act report and the draft biological opinion included in Attachment 4.

1 (2100) p. 39: Selective withdrawal may provide the greatest potential for enhancement of the native fishery below Glen Canyon Dam. Proposals for similar engineering solutions at the dam have been considered by Reclamation on and off since the late 1970's. None of these efforts has been fully developed, and none has answered any of the basic questions of engineering, cost, or biology. Because of the potential for selective withdrawal to provide an effective tool to manage for endangered species it should be given a high priority. The EIS should contain a definitive schedule for evaluation of selective withdrawal and estimated schedules for implementation should the program be viable.

1 (1955) Provide a specific time frame within which evaluation of multi level intake structure for selective withdrawal from Lake Powell will be accomplished.

1 (1956) Recommendations should be provided to implement interim methods to reduce impacts of cold water until selective withdrawal structures are evaluated.

16 (0102) I support temperature regulation, which will minimize the effect the dam has on the canyon.

1 (1726) Temperature modification possibilities are given little discussion in comparison to their importance in maintaining the natural state of Grand Canyon.

6 (0103) Intake structures to increase water temperature would be beneficial.

1 (1710) Because cold water is more dense than warmer water, it will always lie in the bottom of the reservoir.

1 (1438) MLIS or temperature curtain could be beneficial to endangered fish and other resources. In addition, could permit reintroduction of former resident species. Such devices could also change species balance to detriment of trout and humpback chub. Cannot be evaluated on current information. Studies long overdue should have been in DEIS.

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111 (0106) A study of) the installation of a temperature control device (such as multiple intake structures or selective withdrawal structures) at Glen Canyon Dam is necessary so that warm water can be sent downstream to protect and restore the endangered species. Fund and begin NEPA study.

30 (0104) Hopefully the scientific data will guide your decision to monitor the temperature of the water flowing from the dam so that warm water can be sent downstream to protect and restore endangered species.

1 (0514) Benefits of selective withdrawal structures far outweigh the costs involved.

b. Deficiencies, Problems, & Negative Impacts

5 (0486) Selective withdrawal structures not a realistic alternative.

1 (1801) This is an untested solution to the problem of cold water pollution.

1 (1800) Raising penstocks to draw warmer water closer to surface only provides nominal temperature increase; will not work.

1 (1246) Even with construction of $60 million MLIS, downstream temperature may be insufficient to support recovery of humpback chub and other native species.

1 (1696) Costs exceed potential benefits of MLIS to introduce warmer water.

4 (0939) Because selective withdrawal structures will be so costly, every effort to establish efficacy must be made before implementation, including identifying effects on native and non-native fish.

1 (1756) Based on good 5–10 years Adaptive Management Program studies, EIS, NEPA compliance, consultation, engineering, funding, etc., selective withdrawal is many years down the road.

1 (1757) Waiting for implementation of selective withdrawal structures will push reintroduction of humpback chub population well into the 21st Century.

6. New Population of Endangered Humpback Chub and Protection of Cultural Resources Are Considered under Those Specific Resources.

Frequency (I.D. Number) Comment

1. General Comments Concerning Eliminated Alternatives - 13 statements dealt with this subject.

12 (0589) Dismissed alternatives are reasonable and prudent alternatives to the Preferred Alternative.

1 (1850) Reconsideration should be given to dismissed alternatives, which more realistically weigh both economic impacts and the commensurate benefits.

2. Run-of-the-River and Historic Pattern Alternatives - 14 statements dealt with this subject.

a. Support

1 (1083) Reclamation should consider Return-of-the-River and Historic Pattern alternatives along with sediment augmentation as requested by hundreds of concerned citizens and recommended by FWS as a reasonable and prudent alternative in the 5: 3: 93 Draft Biological Opinion.

1 (0723) The most ecological alternative is the rejected Run-of-the-River with sediment augmentation, removal of exotics, restoration of natives, and serious conservation efforts in the Southwest.

7 (0135) I support: favor: am interested in the "Free Flowing River" or "Run-of-the-River" concept.

b. Comments on Elimination

1 (1764) When did FWS agree, per DEIS statement, that "cooperating agencies, including FWS, agreed with EIS team when it recommended elimination of pre-dam-type flow alternatives"? Is it documented?

1 (1082) Run-of-the-River and Historic Pattern alternatives were deemed unreasonable because of increased turbidity, disruption of the food chain, and the necessity of sediment augmentation. Yet Colorado River was naturally quite turbid and warm with a very different food chain. To move the river back to these conditions is quite reasonable.

2 (1091) That a slurry pipeline would take 15 to 20 years to implement and would require an interim operational plan is not sufficient justification for elimination of Run-of-the-River and Historic Pattern alternatives since NEPA was designed to insure integrated planning and analysis. This should be part of long-range planning efforts taking place as part of this EIS that would dramatically alter the range of alternatives considered.

1 (1759) Reclamation elimination of FWS recommendation for implementation of "hydrologic pattern comparable to natural hydrograph" is not same as dismissed "Run-of-the-River" alternative.

Frequency (I.D. Number) Comment

3. Reregulated Flow - 41 statements dealt with this subject.

a. Consideration

1 (1530) p. 47: Term "eliminated" in the summary comments suggests something never again to be considered and that is not true.

1 (1907) Afterbay reregulating dam above Lee's Ferry and sized large enough to reregulate full peaking capacity of Glen Canyon Dam has not been included and needs to be.

3 (1268) (Water districts) request full use of Glen Canyon Dam generating capacity by development of and construction of reregulated flow alternative.

27 (0618) Support building of a reregulation dam to produce environmentally clean power and steady flows.

1 (1252) Unless Reclamation fully addresses reregulating flow in FEIS, question will remain unresolved, and some will seek to reopen issue in future.

2 (0134) I am glad that the idea of the Reregulation dam was scrapped.

b. Impacts

1 (1682) p. 45: The statement "minimum flows establish limits on productivity" is questionable and seemingly contradictory to previous statements that admit to a reduction of algae and invertebrates on the zone of fluctuation. Assuming that biomass is related to productivity (used throughout document), all evidence points to limitations on productivity above the level of the minimum flow. Clarify.

3 (1251) FEIS should disclose information on reregulation so public can judge whether economic benefits of it outweigh costs and environmental impacts; Reclamation's decision to eliminate reregulation inappropriate.

1 (1908) Afterbay reregulation would retain all power benefits and achieve same environmental benefits to river and Grand Canyon National Park as any of the alternatives included in DEIS.

1 (1902) Additional benefits derived from reregulating peaking releases would be on the order of at least $100 billion per year.

4. Eliminated Concepts - 77 statements dealt with this subject.

a. Sand Pumping and Beach Protection

1 (1528) pp. 32, 48: "Eliminated Concepts": Sand pumping and beach protection measures should not be considered eliminated; while may be inappropriate to include as integral part of an alternative, still have merit for local application; NPS states that sand pumping is incompatible with management policies, but we feel non-operational options should be fully considered and implemented if more effective and less costly,

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3 (1244) DEIS should explain why sand pumping and beach protection were discarded; cost effective approach to protect environment minimizing impact on power rates.

1 (1531) p. 48, "Evaluation of Concept": Beach building flows will probably also be least effective in narrow reaches, which is not a valid reason to dismiss sand pumping. In general, the discussion of sand pumping indicates a potentially good return for the investment of effort and dollars. If idea is to be discarded, it should be based on scientific or technical infeasibility, impact on other resources, or cost: benefit.

1 (1532) p. 48, ¶ 3, right column: Is the "Section 404" language intended to be a reason to drop this alternative? If so, it should not be.

2 (0481) Pumping sediment is not a realistic option.

1 (2331) pp. 48–49: Sand pumping and beach protection were properly eliminated from consideration.

b. Removing the Dam

3 (0138) Reclamation Should Repent of Crimes Against Nature and Seriously Consider removing the dam.

1 (0137) Not considering this alternative (removal of the dam) is a dereliction of your duty under NEPA.

4 (1080) Removal of the dam should have been analyzed in detail despite Reclamation's contention that it is outside scope because Reclamation must consider all reasonable alternatives outside scope of Congressional authorization even if they are illegal because EIS may serve as the basis for modifying Congressional approval in light of NEPA's goals and policies.

1 (1081) Reclamation has received numerous requests that the dam be removed. In considering the recovery of the river and the protection of Grand Canyon National Park, any reasonable person would consider removal of the main threat to those resources: Glen Canyon Dam.

2 (0791) Not enough known about effects of dam removal (impacts or restoration), but we may know more in the future.

19 (0140) The dam should go: Glen Canyon Dam must be removed.

26 (0142) Removal of the Dam is the only way to completely restore the Grand: Glen Canyons.

1 (0136) The only alternative that will work in the long run will be the dismantling of the dam. I am aware that the financial forces paying your wages as well as profiting from the dam will never allow this consideration.

5 (0141) Withdraw this draft and reissue with removal of the dam as the preferred alternative.

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1 (0699) How about a volunteer effort to remove the dam at no cost?

5 (0139) Removing Glen Canyon dam would be idiotic: is not realistic.

CHAPTER FIVE
Comments on Resources

Frequency (I.D. Number) Comment

1. Comments Concerning Multiple Resources - 51 statements dealt with this subject.

2 (1271) GCES demonstrated that while water releases can help manage some resources, they are not effective for others; not only or best way to get positive change.

30 (0143) Primary concern should be maintenance of habitat, especially for endangered species and preservation of the beaches.

9 (0176) Less fluctuations would go a long way to enhancing the native flora and fauna.

1 (1669) p. 70 & summary p. 39: Although this section provides information on the relationship between riparian vegetation and wildlife, it does surprisingly little to elucidate the relationships between riparian plant distribution and abundance and hydrology. There is little help in understanding how water release patterns affect the riparian zone.

1 (0144) A temperature sensing device would record extremes that would be detrimental to fish and riparian life in the canyon.

1 (0999) pp. 50–51: NPS objective for all resources is the perpetuation of naturally occurring processes and resources and neither manages for exotic or single species nor supports introduction of non-naturally occurring species into areas within NPS jurisdiction.

1 (1443) p. 51: Not clear why NPS has omitted from its objectives maintenance of flows that reflect (subject only to legal restraints) the pre-dam hydrologic regime; also studies of temperature control using MLIS.

1 (1830) Diversity of species is only good measure of an intact ecosystem—adding exotics does not create a healthier system.

2 (1332) p. 68: Colorado river received non-native plants and animals well before construction of Glen Canyon Dam.

3 (0903) Attainment of historic beach and sandbar conditions with high flow releases unrealistic way to recover endangered fish and enhance riparian habitat and beaches.

2. Water - 46 statements dealt with this subject.

a. Water Rights and Delivery

1 (1935) Water is an important scarce resource.

1 (1791) Glen Canyon's most important product is water.

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6 (1376) Others are pressuring Reclamation for this water; unfair to be deprived of water that was originally ours.

1 (1098) What will Reclamation do with additional water that does not rotate turbines?

1 (0740) Concerned about the impact of process on downstream property and water rights; no taking implication assessment was done. Decision can't be made without it—required by law.

1 (1883) Yield of water from Grand Canyon will decline due to boulder dams and higher rapids.

1 (1444) p. 51: States that all alternatives accomplish objectives of Reclamation for Colorado River Storage Project reservoirs. Seems impossible given enhancement of fish and wildlife and other environmental factors is one objective, and alternatives differ substantially regarding enhancement of these resources.

1 (1621) p. 170: Understood that an annual minimum release of 8.23 maf is expected 50% of the time. However, this paragraph states that 8.23 maf are expected to occur 30% of the time in the next 20 years and 46% of the time in the next 50 years.

b. Water Quality

1 (1375) How will the several alternative storage releases affect the quality of waters reaching Lake Mead?

1 (1725) Quality of water released from Glen Canyon Dam is different from the natural river; lacks sediment and nutrients that are lost in depths of Lake Powell.

1 (0693) DEIS does not address salinity issues.

1 (0694) Storage of water in Lake Powell leads to increased salinity and water loss due to high evaporative losses.

1 (1087) Salinity of Colorado River is caused by existence of Lake Powell, which is a function of the dam's existence which effects endangered Totoaba, other marine life, and water rights of the U.S. of Mexico and requires expensive desalination and water re-routing projects. These impacts should be considered in FEIS, since the water level and surface-to-volume ratio is alterable and related to different release regimes and the existence of the dam.

1 (1461) p. 168: Statement about salinity, nutrients, sediment, selenium, and mercury concentrations may be misleading. More useful would be synopsis of field data of comparative concentrations of substances at varying depths, in bottom sediments, and in fish tissue as means of anticipating potential transport from Lake Powell to Colorado River below Glen Canyon Dam (National Research Council).

1 (2193) p. 174, Column 1, ¶ 2: Lead is implicated as a possible problem in Lake Powell. Are data adequate to support this suggestion? Are you suggesting lead may be a problem downstream?

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1 (1463) p. 174: Statements on dissolved substances in Lake Powell may be misleading. Implication is that the water quality of Lake Powell might become unacceptable. Even if increases did occur, they would be minor and insufficient to cause any concern.

2 (1339) p. 77: Are there citations to support the statement concerning relative rates for dissolved, suspended, and floating materials? Floating materials appear to be entrained in eddies rather than moving directly down the channel.

1 (1605) p. 82: The importance of threadfin shad should be mentioned. For example, "...lethal to threadfin shad, which comprises much of the prey base for the sport fishery of Lake Powell."

1 (2133) p. 82, Column 1, ¶ 1: This section should state why this is important to the river below the dam. Both nitrogen and phosphorus loads are reduced in reservoirs from their inflow values, which changes the location primary (algae) production occurs and makes less nutrients available below a dam.

c. Conservation

1 (1405) See no compromise of water conservation in any of the alternatives examined.

1 (1088) Loss of usable water due to evaporation from Lake Powell should be analyzed.

1 (2305) Would like to see stronger water conservation efforts implemented in Arizona and California.

1 (1863) Not enough water available to produce pre-dam magnitude floods.

1 (1887) Western resources agencies should encourage spring floodflow storage at source, not lower points in Colorado River system, to conserve Western waters for droughts, growth, endangered fish, global warming, etc.

d. Cost

1 (1808) EIS should put an economic value on and report value of the free water Glen Canyon Dam gives downstreamers.

1 (1809) Reclamation could insist on payment for water storage; use funds to rehabilitate downstream ecologies.

1 (1807) Time to assess downstream water users a portion of cost of water storage to maintain the Canyon.

1 (1810) 8.3 million acre feet of water in minimal release year translates into $55 million generated electricity and $0 of free water delivered.

1 (1806) Power consumers pay for free water for water users.

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e. Analysis

1 (1538) p. 72: Statements in these two paragraphs seem to contradict each other. The first paragraph implies river flows are almost completely due to hourly water releases, while the next paragraph states that frequent flash flooding produces temporary uncontrolled peak flows.

1 (1005) p. 72: Discussion of "Pre-dam Streamflows" should note that springtime peaks were often double peaks for period of record 1922–1962 as recorded by USGS gages. This is important given perception by some that mimicking the pre-dam flow regime could be accommodated by a single peak flow.

1 (1337) p. 72: Water inflow into the system pre-dam was unimodal; some inflow from summer monsoons, but there is not a peak.

1 (1460) pp. 167–168: Possible errors in components of CRSS model could have caused errors in probability of empty reservoir, probability of spills, and estimates of power revenues. Adjustments for October 1993 to Annual Operating Plan and others need explanation because of effect on projected power revenues (National Research Council).

1 (1449) p. 83: DEIS handicapped by very weak base of information on lake sediments (quantity and qualities). No studies made of the probability of mobilization of toxic substances as affected by reservoir operating regimes or changing reservoir conditions.

2 (1333) p. 68: Axis for water clarity includes no data points.

2 (1334) p. 68: Separation of effects between water quality and water quantity fails to take into account interaction of flow fluctuations and cold water temperatures and their effects on near shore rearing habitats for native fish. Better explanation of "proper conditions" in backwaters would help.

1 (1462) p. 174: Speculation on relationship of aquatic productivity and phosphorus concentrations, expansion of Oscillatoria longitudinally, and the relationship between temperature and parasitic diseases of fish should probably not be given, since specific field information does not support them. Not clear what the effect of 3 degree Fahrenheit change would be.

1 (1620) p. 169: A column summarizing impacts of Preferred Alternative with RPA flows should be included in the table. Each resource section should provide impacts of the Preferred Alternative that include the RPA flows.

3. Sediment - 476 statements dealt with this subject.

a. Impacts to Sediment

51 (0147) I have witnessed the erosion of beaches.

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1 (1999) p. 68, Column 1, last paragraph: Rewrite first sentence to read: "The river's sediment supply and capacity to transport sediment has been reduced."

1 (1711) Lack of sediment is a function of dam: reservoir existence.

11 (0153) Current management has destroyed beaches.

2 (0154) The erosion of beaches so that the power company can make a profit is unacceptable.

1 (0158) Loss of "real estate" downstream of the dam and south along the Pacific Coast is a real problem that the dam has caused.

1 (1385) Without the dam there would be very few, if any, beaches.

1 (2134) p. 83, Column 2, ¶ 1: A fourth major change related to sediment should be mentioned. Reduced sediment allows greater productivity below dams than occurred at those locations pre-dam due to clearer water and greater light penetration to the bottom.

1 (1452) p. 95: Comparison between 1890 and 1990 conditions is meaningless as variability occurs over periods as short as days or weeks. Images taken a century apart may or may not be representative of conditions for that year or decade.

1 (2135) p. 84, Column 1, ¶ 5: This should be related to dam operations. Floods (flows significantly greater than the maximum during normal operations) have a much greater effect on sand movement in the system than do normal dam operations.

7 (0326) Controlling fluctuations can control erosion.

3 (0323) Flows at and above 25,000 cfs take sediment out of the canyon and should be avoided.

1 (1937) Fluctuating stage has literally nothing to do with erosion capability; it is the flow that moves channel and stream material. To stop erosion, you must stop the flow.

1 (2136) p. 84, Column 2, ¶ 1: In contrast to the effects of dam construction, normal dam operations have little effect on sand losses down the river but may cause movement of sand from beaches into the river.

1 (1938) Current stage changes are very mild and incapable of producing the "erosion" as stated.

1 (1972) Normal daily maximum flows need to be capped at no higher than 13–15,000 cfs; lower normal maximum cuts into the higher deposit at a lower elevation, but with lower energy, too, thus better protecting and restoring downstream resources.

1 (1762) How can SASFA threaten sediment resources more than MLFFA if the probability for net gain in riverbed sand is greater with SASFA?

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1 (1777) SASFA has a higher percent probability of net gain in riverbed sand than MLFFA.

5 (0826) SASFA best because it is 50% less likely to have net sand loss.

1 (0619) There may be environmental impacts from smooth flows, i.e., silt build-up in slow areas and less ability to wash out rock slides.

1 (1455) p. 104: Text states that sand bars would be stable under the Preferred Alternative, but scientific evidence used in DEIS shows that they would be dynamic, eroding slowly until a beach-building flow occurs. Operations must allow for occasional beach-building flows.

1 (1467) p. 185: Disagree with the conclusion that the reach from the Paria to the Little Colorado River is most susceptible to short-term sand loss. Depends on relationship between dam releases and sediment transport from the Paria. What is short-term (20 years or 5 years)? (National Research Council)

1 (1451) pp. 86–87: Discussion of sand supply from Paria flawed because fails to take into account meso scale fluctuations in supply from Paria. Based on present conditions and does not take into account known conditions that might return.) Considerable evidence that tributaries including Paria have changes in recent past (Hereford 1986, Graf 1987).

1 (2138) p. 95, Column 1, ¶ 1: What is the difference in erosional rates between Lee's Ferry and Phantom Ranch (Grand Canyon)?

2 (0156) Our experience is that beaches were more stable and consistent during the constant 5,000 cfs flows.

3 (0101) Steady flow alternatives will best preserve beaches.

6 (0374) With steady flows there may be no beaches left.

1 (1884) Beach erosion relations are not mentioned with regard to exfiltration, flow velocity, and maximum: minimum flow limits.

1 (2108) pp. 146–147: The discussion of camping beaches and flows only addresses the flow related variable of stage height as a function of discharge and beach size. The more critical issue of long-term sediment storage in the system and rates of erosion associated with given flow regimes should be referenced.

1 (2194) p. 185, Column 1, ¶ 1: According to Jack Schmidt: "It would be naive to institutionalize an annual set of flows for beach building because we are nowhere near being able to know what a certain flow will do." "We need a flow of high enough and long enough to deposit sand in eddies but since these flows also move sediment downstream, we must be careful about what we pick as the ideal beach building flow." The DEIS should explain the gross uncertainty associated with high flow release experiments.

1 (1556) p. 187: Nothing is said about transport of sand out of the system by a beach building flow. It is implied it only moves up out of the channel and onto the beaches. While it may

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not be able to be quantified, the fact that a significant amount of sand would exit the system should be acknowledged.

1 (1560) p. 198, ¶¶ 3–4, under "SASF": Sandbars are expected to aggrade with habitat maintenance flows. Is there reason to believe that these sandbars would be stable more than a few weeks or months, or is this something that is subject to change after testing?

1 (1515) Summary p. 44: It should be noted that high and moderate fluctuating flows would best maintain backwater habitats over the long term when compared to the other alternatives.

2 (1317) Summary p. 44: No comparison made of the rate of filling backwaters between Preferred Alternative and SASFA. Is there recent information to improve analysis of these issues?

1 (1340) p. 91, p. 93: There is no need to sidestep the fact that backwaters are important to native fish.

1 (1673) p. 93: Column 2, second full paragraph implies that backwaters have little or no potential for warming; reword.

1 (2137) p. 93, Column 2, ¶ 2: What information is available on number, location, and size of backwaters at different flows? Also, what is the definition of backwater used by hydrologists and biologists? What are the criteria that define an ideal backwater for native fish? For non-native fish? Where are these criteria met in Grand Canyon?

1 (1541) pp. 93–94: Discussion of backwaters and marshes fails to mention antecedent conditions. May be greater or lesser numbers of backwaters or marshes at given flow levels, but differing prior flow conditions would result in different conditions at identical subsequent flow levels. May not be possible to manage for greatest number or surface area of habitats because when flow regime is changed to maximize backwaters, natural processes are initiated that begin to change habitats. "Maximum" for these habitats is moving target.

1 (2336) p. 94: Figure III-18 is bogus and too generalized to be used for policy making decisions. Relative backwater numbers appear to be made up by the authors of this report and were not peer-reviewed.

1 (1557) p. 190, 194, last paragraph: The text fails to disclose that this, and the other fluctuating flow alternatives, are best for the long-term maintenance of backwater habitat without reliance on the unproven habitat maintenance flows.

1 (2310) Transport of selenium and other trace elements and heavy metals in sediment loads should be studied to determine any changes caused by alteration of flow.

2 (0322) Ramping down rates that are too fast cause most of the damage to beaches.

1 (2140) p. 95, Column 2, ¶ 1: What is the contribution of up- and down-ramping to erosion in the form of various types of erosion (e.g., longer up-ramping time may extend exposure time to wave action, etc.?

Frequency (I.D. Number) Comment

1 (1542) p. 95: What other resources could be negatively affected by upramp rates? Please specify or delete.

19 (0146) Drastic fluctuations (ramping up and down) have seriously damaged the remaining beaches.

1 (0049) Research has shown that the ramp-up rate has little or no effect on beach erosion, but that down-ramping of the units does.

2 (0642) Interim Operating Criteria have prevented rebuilding of beaches up to high water line.

2 (0884) Interim Operating Criteria prevented rebuilding of beaches up to previous high water line.

1 (1795) Today the dam with its steady (Interim Operating Criteria) flows stabilizes beaches, and allows more permanent beach climax zone which fluctuations favor.

1 (1794) Present steady flow releases from Glen Canyon Dam erode terraces, fix sandbars and stabilize beaches that would not otherwise be stable.

1 (1262) Proposal to fix sediment problems of Interim Operating Criteria with high releases questions validity of Preferred Alternative and supports need for flow changes.

1 (0701) Sediment system in the canyon has recovered from 1982–83 floods.

1 (1702) Most of the damage to beaches: loss of sand, occurred in 1983–84 when events beyond man's control took over control of downstream flows.

1 (1797) Floodflows must come again to canyon beaches to insure their survival and keep riparian life intact.

2 (1308) Summary p. 36, & main doc. p. 68: First paragraph of sediment transport section does not differentiate between sediment particle sizes. Emphasis on sand omits discussion of finer sand (silt and clay) and coarser sand (cobble and rubble), which are very important to Colorado River. For example, benthic algae attached to coarse particles not addressed in DEIS.

1 (1932) Further research on actual riverbed, beach, and sandbar erosion and aggradation is needed, using more direct measurements; indirect measurements based on unreliable data and models are not acceptable.

1 (2334) pp. 91–99: Computed sand loads based on discharge curves are unreliable. Net sand loss is quite possible between Lee's Ferry and the Little Colorado River. Further research on actual erosion and aggradation (riverbed, beach, sandbar) is needed using more direct measurements. Indirect measurements based on unreliable data and models are not acceptable. Research flows of GCES were too short to adequately evaluate long-term river bed, etc., dynamics and that steady-flow alternatives are the most conservative of sediment resources.

Frequency (I.D. Number) Comment

1 (2351) p. 196: Under steady flows "between Lee's Ferry and the Little Colorado River, the river would accumulate sand and gravel over time." This statement is not supported by direct measurements, only uncertain indirect measurements based on untested models.

1 (1465) pp. 183–186: Table IV-6 shows that with the No Action Alternative, the probability of gain in sediment is 50%, which is random. DEIS should provide evidence that the system is random, given current operations.

1 (2349) p. 184: Table IV-6 must be turned around to look at the probability of net LOSS of riverbed sand. This would show that SASFA is 29% less likely to have net riverbed sand loss after 20 years and 50% less after 50 years compared to MLFFA.

1 (1361) pp. 184, 186: Why are the numbers in column 2, Table IV-7 for probability in net gain sand storage different from the numbers in row 1, Table IV-6?

1 (2350) p. 185: Uncertainty exists in Table IV-6, and can affect relative differences. Absolute differences and quantities are important. Uncertainties could lead to rapid net sand loss versus the gains shown in DEIS. Statements on sediment balance below Little Colorado River and transport past Phantom Ranch are not unanimously supported by GCES researchers. No direct evidence exists to support these claims.

1 (1622) p. 185, ¶ 1, last sentence: Does this statement imply that there is no difference in sand storage between the alternatives? Second paragraph: Please clarify whether or not the new sand loss between Lee's Ferry and the Little Colorado River includes the Little Colorado River sediment input.

1 (1464) pp. 183–186: Concept that the transport of sediment is roughly equal to the amount that enters the system is not supported by sufficient evidence. Hard to believe this coincidence considering water delivery and power requirements that control releases; explain.

1 (1466) p. 184: Not very helpful to show values for 20 years and 50 years because those probabilities are very close to each other for most cases. More instructive to know the probability of net gain for 1, 5, 10 and 50 years; 5 year value especially important because of anticipated frequency of beach building flows, which is 5 years. (National Research Council)

2 (1341) p. 95: The assertion that "although aggradation rates in 1987–1990...erosion rates were twice as great" is unclear as to which period erosion rates refer to.

1 (1338) p. 72: Sediment input is bimodal.

2 (1289) What are impacts to beaches of wind and rain on exposed beaches, human use moving sand toward river, and raft mooring changing near shore currents as compared to fluctuating flows?

1 (2195) p. 186, Column 2, ¶ 1, Beach sand: Wind, storm runoff and human activity erode sand from beaches. Boating and waves erode beach faces. These factors take sand from

Frequency (I.D. Number) Comment

beaches and move it into the river, independent of river flows, and will continue regardless of changes in release patterns. The DEIS should expand the discussion of all erosion sources.

1 (1543) p. 95: Reclamation must acknowledge that boat mooring modifies local water currents and could result in beach erosion. A 37-foot long raft may well function as temporary jetty. Western supports further studies of effects moored rafts may have on beaches, as there is the potential for significant beach protection.

1 (2141) p. 96, Column 2, ¶ 3: What analysis was done of the individual contributions of tractive, wind, human incursion, boat-caused wave action, etc., impacts to erosion? What are the interactive relationships among these causes of erosion?) Cumulative impacts? Tradeoffs?

1 (1544) p. 97: The sentence that appears to minimize potential impact of recreation to camping beaches should be deleted. In addition to direct impact of physically transferring sand from higher to lower elevations, camping use roughens surface of sand bars and increases effectiveness of wind and water erosion. These effects are in addition to raft mooring impacts.

1 (1553) p. 146 through Chapter 4: Unclear how camping beaches are affected by steady flows, recreational use, and vegetation encroachment; clarify. (Western)

1 (2139) p. 95, Column 1, ¶ 5: What are the individual contributions of erosional mechanisms to total erosion from sand deposits (e.g., seepage, wind, waves, recreation, etc.)? What methods were valid for quantifying all sources of erosion, and how accurate were the methods used?

b. Sediment Protection

6 (0429) The volume and distribution of sediment in the river corridor are of primary importance.

1 (1945) The No Action Alternative does nothing to stop or correct beach erosion; should not be selected.

1 (1946) The MPPCA does nothing to stop or correct beach erosion; should not be selected.

1 (1947) The HFFA does nothing to stop or correct beach erosion; should not be selected.

11 (0658) MLFFA will permit recovery of beaches.

6 (0092) SASFA would have the smallest impact on beach erosion.

43 (0148) I am concerned about the preservation of the beaches. We need to prevent further loss. Adaptive Management Program must ensure.

3 (0162) I am concerned that measures be taken to protect and restore the sandbars.

Frequency (I.D. Number) Comment

118 (0151) Ensure replenishment of beaches. Give it high priority.

1 (0152) Hopefully scientific data will guide your decisions to ensure the preservation and replenishment of beaches.

1 (0410) Amend Grand Canyon Protection Act of 1992 requiring funds be allocated to preserve and replenish beaches.

1 (1958) Re-examine sediment loss in the first 60 miles of the river and propose changes to alternatives to promote beach building in that stretch.

7 (0149) I am encouraged by the fact that there is finally a proposal that gives high priority to the preservation and replenishment of beaches. Keep in final EIS.

3 (0662) Beach erosion will continue no matter what man does.

10 (0150) Flows should be limited to those that do not harm the beaches.

4 (0943) Beach protection measures should be retained in all alternatives as practical method to stabilize and protect beaches, banks, and cultural resources

3 (0663) Reintroducing silt is the only way to change beach erosion.

3 (1272) Long-term beach maintenance will require more than changes in daily dam operation. Consider vegetation management, human use restriction, raft mooring restoration, protection with native material, and selected sediment augmentation; all more flexible.

1 (0155) Beaches can be rebuilt by annual tributary floods and high water year flows.

1 (1848) Insufficient consideration has been given to alternate beach restoration options such as sand pumping, beach protection, or a reregulating structure.

1 (0691) No mention of enhancing handicapped access by ensuring replenishment and preservation of beaches found in DEIS.

1 (2330) pp. 41–44: The analysis of sediment augmentation is completely inadequate.

14 (0671) Further study of sediment augmentation is critical. Fund and begin studies: NEPA now.

1 (2337) p. 95: "Short-term changes in sandbar.. erosion twice as great as aggradation." This evidence points to the need to study sediment augmentation to ensure the long-term health of the Grand Canyon ecosystem.

1 (1842) Since inexorable flow of sediment arriving at Lake Powell daily, confident sediment augmentation will be addressed in future. Sediment itself will force the issue.

Frequency (I.D. Number) Comment

2 (1727) Sediment augmentation given little discussion in comparison to its potential in maintaining natural state of Grand Canyon. (Cost no greater than other changes being considered.)

1 (1787) Sediment augmentation is essential for restoring the Colorado River in the Grand Canyon.

1 (1786) Sediment augmentation will improve turbidity (important cover for native fish) and help guarantee sediment balance is maintained in Grand Canyon.

1 (1803) Sediment augmentation should be held open as a future option, especially if it doubles: triples economic life span of dam.

1 (2354) Attachment 1: "The public did not want alternatives with additional structural features..." This statement is wrong. Personally asked for studies of sediment augmentation at San Francisco scoping hearings and listened as several others asked for the same studies.

10 (0159) Consider some means of incorporating sediment in the discharge from the dam.

2 (1305) Summary p. 30: Public would be interested to know if other forms of sediment augmentation were considered.

2 (0848) Agree that sediment augmentation is not cost effective.

1 (0680) Sediment augmentation is not a realistic option.

1 (0997) pp. 50–51: Under "Resource Management Objectives" the section on sediment states that NPS considers the resources within Grand Canyon National Park more important than those in Glen Canyon National Recreation Area. Please modify this to reflect "NPS considers preservation of all resources a priority and will work within the units of NPS to mitigate any adverse impacts to those resources."

1 (2335) p. 93: Return current channels are not well understood. Given the probable importance of these channels to native fish species, this area needs much more research.

1 (0612) Is there some physical channeling that would allow a reasonable flow and prevent the erosion?

1 (1805) DEIS weighs in favor of sediment solutions that require little or no money to deploy, instead of effective resedimentation program.

2 (0160) I suppose it is not possible to mix up the bottom of the reservoir to allow sediment rich spills on occasion.

2 (1316) Summary p. 44: No comment made about armoring of upper river.

1 (0161) Are there times of the year when dredged sediment could be added to the river without harming fish?

Frequency (I.D. Number) Comment

1 (2142) p. 97, Column 1, ¶ 1: The EIS should explain why Reclamation supports the NPS reluctance to employ non-operational alternative beach stabilization techniques. Reasons given are: 1) rock is not always available; 2) alternatives to rocks may not work; or 3) structures may not be allowed within the "proposed" wilderness area. Also, why has the NPS rejected a proposed Reclamation demonstration project to determine the feasibility of dredging sand from pools to create more sandy beaches? This method promises to be far less intrusive than flood releases. There is no indication recreational use of the river corridor by rafters or hikers would diminish if all sand beaches were lost even though campsites might be relocated. Where is this issue discussed and how does this affect your choice of alternative?

6 (0317) Fund a long-term solution to sand depletion.

c. Lake Powell Sediment

1 (1802) Rate of sedimentation, in acre-feet or volume conversion, and projected half-life [of dam] have bearing on dam operation and downstream ecology. These data are missing: must be added.

1 (1828) EIS must spell out the dam's half-life in years.

4 (0697) EIS should say what will happen in long run. How long until Glen Canyon Dam is unusable because of sediment filling?

1 (0994) P.43: Identifies that the life of Lake Powell could be extended by using sediment augmentation, but fails to identify that the life of Lake Mead could be shortened.

1 (1454) p. 101: Statement in DEIS about sediment quality in Lake Powell suggests that there is no useful information about this issue; not true. Published and unpublished data collected by NPS provide data on lake sediments (Wood and Kimball 1987), as does Kidd and Potter (1978).

1 (2338) p. 101: DEIS has an inadequate analysis of upstream effects of rising Lake Powell levels. For example: "Rising water in Lake Powell has caused some slumping of formerly stable cliffs and slopes."

6 (1921) Expected more research in DEIS on nutrient loading and sedimentation in Lake Powell to determine how much nutrient mass will be inaccessible over time.

d. Other Sediment Issues

1 (1672) p. 91: Does definition of sandbars given here (form banks) preclude midchannel sandbars such as the one so prominent in photo on p. 67? If so, what do the sediment people call it?

4. Fish - 291 statements dealt with this subject.

1 (2002) pp. 103–114: This section lacks an introductory section contrasting the pre-dam and post-dam riverine conditions, especially in regard to the assemblage of fishes and conditions

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of primary productivity. The reader is not informed, for example, that some of the present ecosystem components, like trout, Cladophora, Gammarus and associated diatoms, were not present during pre-dam conditions. This is a significant omission given the importance assigned to these components in the following 20 pages and the apparent desire to see them enhanced by dam operations. An excellent introduction to this section exists on pages 68–71 in the segment titled "Flows, Sediment and Downstream Resources" because it covers appropriate material, and because it offers a balanced perspective of the pre-dam and post-dam river system. In contrast, the Fish Section seems to reflect a bias toward steady flows and attributing all environmental deficiencies on dam operations (particularly to the exclusion, or at least minimizing, of the role of competition: predation from non-native fishes). The most pertinent material from this segment should be summarized and repeated in the Fish Section as an introduction. A balanced introduction is especially important here because the dispute between the United States FWS's imposed Preferred Alternative and the Cooperating Agencies' Preferred Alternative concerns only the fish resource (specifically, the conditions that are desirable for native fish). A reader seeking factual information about the Grand Canyon fishery in order to understand this controversy and reach their own conclusions would only become confused and misled by reading this section.

1 (2003) pp. 103–114: Dividing the discussion of the fish species between two sections (i.e., Fish and Endangered and Other Special Status Species) weakens and confuses the issues. This splintering makes it very difficult to conceptualize and understand the aquatic ecosystem as a whole. Most of what is scientifically known about native fishes in Grand Canyon stems from research on the humpback chub, yet none of this information can be found in the section devoted to fish. Recommend that the listed fish species and the Kanab ambersnail be addressed in the Fish (aquatic) Section, whereas the listed terrestrial species are addressed in the Wildlife section. Summarize the status information for all listed species in the Endangered Species section and provide cross references to the principal discussions.

1 (2025) pp. 199–214: All fish, including the endangered species, should be discussed in this section. Separating species into two non-contiguous sections may serve political purposes, but it disrupts the reader's concentration and makes evaluation of impacts to the fish community unnecessarily difficult. Conflicting analysis between warm water non-natives and warm water natives could result.

1 (1661) Confusing to have some discussion of native fish under ENDANGERED SPECIES and some under FISH, please consider combining if possible.

a. General Impacts

1 (2113) pp. 208–209: The inclusion of endangered fish research flows is ignored in the discussion of effects of the MLFF Alternative on fish.

1 (1430) Steady flow alternatives would be less desirable from an aquatic resources management perspective because of impact on seasonal lake level fluctuations at Lake Mead.

15 (0168) Moderate the flow from the dam to ameliorate harm to fish.

Frequency (I.D. Number) Comment

1 (2040) p. 209, 210, Column 1, ¶ 4: This statement is not correct; otherwise it would not have been necessary to have modified the original low fluctuating flow alternative (which was the interim flow with habitat maintenance and common elements). Apparently this paragraph was written before the Preferred Alternative was altered to include research steady flows. Dam release patterns for the Preferred Alternative, which is designed in part to mimic the SASFA (during 8.23 or less years and for half the year), cannot be "identical" to those under the ILFFA. In addition to the habitat maintenance flows, this alternative also has fish research flows that are a fairly large departure from the interim flow regime.

1 (1607) p. 105, first column, ¶ 1, second sentence: The meaning of "The reverse if true under steady discharges...," is unclear.

1 (1369) p. 209, Col 2, Paragraph 3, last line: Should the flow mentioned be 5,000 cfs, not 8,000 cfs? Limited development above the 5,000 cfs level.

5 (0441) Non-native warm water fish were dominant, with catfish and carp comprising 80% of all fish present. Now cold water has reduced carp and catfish from 80% to less than 1%.

1 (2034) p. 205, Column 1, ¶ 1: The second sentence mentions "warm refuges" in reference to backwaters. This contradicts with an earlier statement on page 200 that mentions the limited warming of backwaters.

1 (2032) p. 203: It is unclear what "insight" reattachment bar heights provide into backwater maintenance.

1 (2341) p. 109: "It is speculated that..." What are speculations doing in this document? How can speculations drive the environmental indicator for reproductive accessibility? This section of DEIS is inadequate.

1 (1768) MLFFA cannot provide stable backwaters.

1 (1572) p. 223, ¶ 1: Fluctuating flows would tend to flush out backwaters on a daily basis prolonging useful life. Many formed under normal fluctuating power operations. A vital question is this: What is relative effectiveness of daily fluctuations v. periodic higher flows in maintaining backwater habitat over the long-term? How does eventual filling of backwaters under steady flows compare with the reduction in useability from daily fluctuations in terms of fish and marsh vegetation effects?

2 (1307) Summary p. 36: Last paragraph of water volume section on p. 36 makes no mention of differential warming and cooling in near shore habitats relative to main channel. Important differences to early life stages of fish, and should be acknowledged.

1 (1623) p. 210, second column: While we agree with the premise that stable backwaters would increase habitat suitability for some non-native fish species, species such as fathead minnow require stable habitat throughout the year. We believe most backwaters become eddies somewhere above flows of 10,000 cfs to 12,000 cfs, and certainly at 20,000 cfs. Under fluctuating flow regimes, this habitat would be changing daily.

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1 (2026) p. 200, Column 2, last paragraph: There appears to be a contradiction between the first and fourth sentences in this paragraph. In the first sentence, the "limited warming of ... backwaters" is mentioned in connection with the potential for mainstem reproduction of Native fish. However, in the fourth sentence, backwaters that are "... capable of warming, separate from the main channel" are identified for recruitment of fish.

1 (2208) p. 205, Column 1, ¶ 4: The number and kind of backwaters is dependent on preceding conditions as much as the present flow conditions. Your statement regarding maintenance of backwaters with high flows should be expanded. Also, although some backwaters are lost during flooding due to shifting of sand bars, they are replaced by others after floods subside. Tributaries may adequately sustain healthy populations. In these instances, mainstem backwater habitats may not be required. Some discussion of these possibilities seems in order.

1 (1877) Summary p. 47: Habitat building flows may be used to effectively restore backwater habitats, and recreate sandbars. However, the data is far from complete; premature to claim that any specific flow will do the job. For all we know, backwaters may not form until flows reach 60,000 to 80,000 cfs. If high flows do not restore sandbars, then the management strategies in this EIS may have to be radically altered.

1 (1347) p. 109: Analysis of backwaters at various flows is a valuable piece of information. Work by Weiss and McGuinn-Robbins should be incorporated in the analysis for native fish.

1 (1770) Highly probable that with steady flows and stable nearshore habitat, backwaters would decrease in biological relevance.

1 (1566) p. 213: Paragraphs for the steady flow alternatives, in both the FISH and ENDANGERED AND OTHER SPECIAL STATUS SPECIES sections should indicate limitations of benefits in providing "dependable rearing areas that warm on a daily basis" noted in the DEIS response to Recommendation 3 b. on page Att-14. The steady flow alternatives do not, at minimum flows (11,000 cfs) "make sufficient backwaters available" for habitat. Reflect limitations in Tables II-7, IV-8, IV-12.

1 (1943) Lowering the discharge to 5,000 cfs for twelve hours day or night has a negative impact on the littoral benthis community; raise base flows to true 8,000 cfs.

2 (1314) Summary p. 38: Organic matter drift is a common phenomenon in both regulated and unregulated stream, whether or not fluctuating discharges are involved.

6 (0363) 25,000: 4,000 flow changes would reverse reduction in sloughing enhancing food supply for aquatic species.

3 (0324) Raising minimum flows to 5,000 cfs increases food resources for fish.

1 (1778) SASFA will provide an increased standing crop of Cladophora and associated invertebrates due to base flows of 8,000 cfs rather than 5,000 cfs.

Frequency (I.D. Number) Comment

6 (0440) Pre-dam meager algae production limited kinds of fish and riparian wildlife. Now more algae equals more insects and birds, as well as fuel for ecosystem downstream and food for fish.

4 (0325) Fluctuating flows cause distribution of food resources for fish down the canyon.

1 (1363) p. 204: Maximum power plant capacity is not listed in Table IV-9.

1 (1876) Summary p. 38: The main damage to Cladophora is not loss due to drift under fluctuation flows, but desiccation during exposure. Drift of damaged Cladophora is a subsequent result.

1 (2147) p. 105, Column 1, ¶ 3: Doubt conditions described are typical of in situ conditions. Is drift described an allochthonous source in otherwise autochthonous system? Drift is organic source to downstream areas. Growth rate is probably highest for Cladophora prior to reaching maximum potential biomass. Suggests sloughing and loss of strands downstream provides higher rate of production...a higher energy conversion rate. Why has this relationship not been discussed? Have not established that standing crop is parameter of importance. If goal is to maximize production, maximizing standing crop will prevent it. Since no goal is set, displaying a graph that implies that greater standing crop is better is premature. Another graph more indicative of situation would be to compare light and turbidity levels with river miles or kilometers below dam. Would help explain distribution better. (CREDA)

1 (2146) p. 105, Column 1, ¶ 2: Your conclusion regarding one year impacts on Cladophora is speculative with little support and disagrees with Pinney's conclusion of 2–4 weeks. Would populations established under fluctuating flows be inherently unstable, or is it unstable when patterns are continually changed, as during research? Even under fluctuating flows, Cladophora would reach some stable level.

1 (2149) p. 105, Column 2, ¶ 3: Steady flows may decrease energy transfer downstream because less Cladophora is dislodged upstream and there is typically higher turbidity downstream. The decrease in energy transfer may impact humpback chub and riparian areas downstream of the main area of fluctuating flows and high productivity. Algal production is now higher than ever in this river reach; yet apparently what has been produced still does not meet some, as yet undefined, production level. Since it is not defined, implementing measures to achieve it does not make sense. What goal is being sought by the efforts to increase production of algae? Why is the present level considered undesirable when it exceeds anything ever seen in this area historically?

1 (2204) p. 203, Column 2, ¶ 2: The referenced studies fail to discuss the differences between their test data and the real world data in order to rectify the obvious differences between what we all see and their tests. Your attempt to develop a proportional difference between no action and the alternative may be incorrect. The DEIS should recognize that higher peaks will create bank storage at higher elevations, which will contribute water over a longer time period and thereby wet Cladophora for a different period than would lower peaks.

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1 (2205) p. 204, Table IV-9: This chart does not give the wetted perimeter at the Little Colorado River. The entire reach from the dam to the Little Colorado River is considered prime Cladophora habitat due to clearer water. You could provide us with an estimate of the change in overall habitat for this reach and then discuss the relative importance to the aquatic food base for the entire river.

3 (1313) Summary p. 38, & main doc. p. 68: Specific information from Usher and Blinn and: or Angradi and Kubly should be used to clarify exposure times that adversely affect Cladophora.

1 (2339) p. 105: Cladophora not resilient to fluctuating flows—over 1 year impact on the ecosystem possible, but not yet determined! How can you have an accurate analysis of any fluctuating flow alternative with this uncertainty at the base of the food web?

1 (1565) p. 212, ¶ 2, and other places: Please address the question of whether some alternatives would result in a shift of Cladophora to shoreline areas, with a loss of existing Cladophora in mid-channel due to greater mean depths.

1 (1675) p. 104: Cladophora—what organisms live in it?

1 (1342) p. 105, p. 203: Angradi found that 6–8 hours of exposure caused significant decreases in Cladophora biomass.

1 (2352) p. 209: Under MLFFA "shoreline zones between the reliable ... 5,000 cfs and 8,000 cfs ... would support an aquatic food base." This assertion is wrong; cladophora would be disrupted for periods extending over one year by any fluctuations in this range.

1 (2203) p. 203, Column 2, ¶ 1: Your suggestion of impacts to Cladophora implies problems upstream of Lee's Ferry, which is 15 miles below dam. Good growth of Cladophora occurs at least to Little Colorado River, which is 75 miles below dam. This suggests impacted area, if any, is less than 20% of Cladophora-rich area (15 miles of 75 total) and impact is about 5% (wetted perimeter of 387 v. 405). We conclude, if your numbers are correct, overall loss of Cladophora to 75 miles of principal aquatic food base is about 1 percent (5% of 20%) if minimal flows are reduced from 8,000 cfs to 3,000 cfs. If this is a reasonable conclusion from your data, then we may conclude impacts to aquatic food base are minimal. In any event, why has DEIS not attempted to provide reader with an assessment of overall loss of Cladophora as a percent of total Cladophora available?

3 (1310) Summary p. 37, & main doc. p. 68: Cladophora glamorata is a widely distributed algae found in many streams of the Southwest U.S.

1 (2215) p. 211, Column 1, ¶ 3: What would happen to algae grown at depth during steady flows when flows are maintained higher if algal production at depth is a function of water depth?

1 (2150) p. 106, Column 1, ¶ 1: Why is the discrepancy not resolved between study test results concluding a 50% removal of algae and macro invertebrates during daily fluctuations and actual, observed field conditions wherein algae and macro invertebrates exist in the fluctuating

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zone? Explain the difference in expected total biomass for a reach with reliable inundation and lower maximum flows v. the same reach with fluctuating flows and higher maximum flows, recognizing that some accumulation of algae occurs above the reliable inundation level.

1 (2196) p. 200, Column 1, ¶ 3: Carothers & Taulbert say historically lush growths of algae occurred in the fluctuating zone despite periodic drying. This contrasts with Angradi's results, which say 4–6 hours exposure kills it. Algae grew above the reliable wetted stage, probably sustained by back storage, pockets of water among rocks, etc., yet DEIS says the aquatic food base is only indicated by reliable river stage. The DEIS needs to explain the disparity.

1 (2144) p. 104, Column 2, ¶ 1: Algal productivity below dam now higher than ever. Since energy contribution to lower canyon river occurs as result of fluctuating flows, how would change in flows be better? Would steady flows decrease organic contributions to lower river if less is entrained? Desert rivers like Colorado cannot rely on sparse riparian vegetation as source of fixed energy, but instead must generate its own energy from within, which attaches more importance to increased algae production in clear water below dams when compared with pre-dam. Areas downstream of dams that remain turbid also have higher production after dams due to greater production in clear portions feeding fixed energy to downstream areas. More explanation of energy transfer by aquatic system is needed to justify changes.

1 (2216) p. 211, Column 1, ¶ 4: If food base can be expected to establish at some level coincident with a flow pattern, may be incorrect to speculate that one flow pattern or another is any better or worse than any other, especially as it relates to growth and condition of fishes. Significance of one cap on algal colonization or any other should be explained if there is a reason. Fixed or slightly declining nutrient load from Lake Powell coupled with enlarged Cladophora population near dam may glean nutrients sufficiently to stress downstream algae. With steady flows reducing growth rate and sloughing, energy transfer downstream should decrease under this alternative. Discuss these possibilities as to consequences to downstream productivity rather than pass it off as of unknown significance.

1 (1368) p. 209, Col 2, Paragraph 2, lines 9–10: The food base would experience daily exposure.

1 (2197) p. 200, Column 1, ¶ 2: This may grossly bias the comparison, since some food base exists above the minimum reliable stage with fluctuating flows but does not with steady flows. This approach gives no value for accumulation of food base above reliable stage even though some occurs. (See p. 106, Fig. 111-26; also see Fig. IV-12, which does not recognize the accumulation above reliable stage.)

1 (2201) p. 201, Column 10, ¶ 1: The suggestion that the aquatic food base will be improved with this alternative is speculative. There is at least equal evidence supporting the opposite result (e.g., reduced growth rate, reduced sloughing, lowered nutrient loads, etc.) in areas downstream of Lee's Ferry. This native over-simplifies the issue and thereby misleads as to the actual impacts.

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1 (2342) p. 109: The indicator for growth among the adult native fishes is the aquatic food base. One speculative indicator piled atop another! How can you call this scientific resource management?

1 (2340) p. 106: Using "reliable minimum stage" and reliable wetted perimeter" as indicators of aquatic food base is much too indirect. For the long-term monitoring and research and Adaptive Management Program, direct measurements of biomass and similar parameters are needed.

1 (2214) p. 211, Column 1, ¶ 2: Suggestion that aquatic food base will be improved with alternative is speculative. Equal evidence supports opposite result (e.g., reduced growth rate, reduced sloughing, lowered nutrient loads, etc.) in areas downstream of Lee's Ferry. Imply no downward adjustments in flow would occur under this alternative; may not be correct. Should discuss impacts to adults and reeds that would occur if flows were held steady for a month and then dropped to a new, steady and lower flow. In steady flow alternative, what would dewatering algal beds for three months do to primary production in river? How long would it take for production to recover from drying?

1 (2145) p. 105, Column 1, ¶ 1: The algae standing crop may increase but, the growth rate would drop. Sloughing of algae would decrease, thereby decreasing energy transfer downstream to less productive (more turbid) areas. Also, if the periphyton community recolonizes shoreline zones at higher steady flows, it will be lost when lower, steady flows return. Is the biomass or growth rate more important below the dam? Which is more important to downstream reaches? If there is less biomass from areas exposed, how much less and how does the reduction vary with elevation above the permanently wetted area?

1 (2151) p. 106, Column 2, ¶ 1: This section suggests we may produce more algae biomass upstream (above the Little Colorado River) when such a production is not shown to be needed or necessary. What is the reason for increasing algal production in this reach?

1 (1667) p. 38: The statement that "they [a few species of aquatic organisms] account for biomass production far exceeding that in more diverse and species-rich environments" either needs substantiating citations or should be deleted or clarified. To what organisms does it refer? It may not be accurate.

1 (1343) p. 105: Sentence that states "the reverse is true under steady..." implies that more biomass occurs above zone of fluctuation when flows are steady. Reword.

1 (1676) p. 105: Statement "the reverse is true under steady discharges (less than 5,000 cfs daily fluctuation)" implies that more biomass occurs above the zone of fluctuation when flows are steady. Is this true? Also, oligochaetes should not be italicized.

1 (2143) p. 103, Column 2, ¶ 3: Both nitrogen and phosphorus loads are reduced in reservoirs from their inflow values, which changes the location in which primary (algae) production occurs and makes fewer nutrients available below a dam. Below the dam, the overall trend shows N also decreasing, being about one-third of pre-dam concentrations. Less phosporus is needed now to use all available nitrogen, and we don't know where this relationship will stabilize. You should more fully explain the relationship of P with intake depth. Also, are

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you suggesting a change in intake elevation would enhance P availability downstream? If N is reduced, what difference would this make to stream productivity?

1 (1348) p. 109, Column 1, ¶ 4: Angradi, et al., also discuss the adverse effects of daily fluctuations to recruitment.

1 (2112) p. 205, Paragraph 3: This paragraph repeats the unsubstantiated statement that juvenile fish may be killed due to fluctuating flows forcing them into the mainstem. This should be corrected.

4 (0301) Water temperature is important to survival of current species of fish.

1 (2217) p. 211, Column 1, ¶ 5: Generalization that young native fish are limited in their ability to achieve reproductive size by cold river conditions belies successes achieved in Little Colorado River and other tributaries by several species of native fish. Is there evidence that main channel has ever been needed by these species to sustain their numbers? Is it not possible these species have always used tributaries in canyon for recruitment? Have not seen data that supports necessity for main channel spawning to sustain any native fish in canyon. Young native fish must still travel into cold mainstem water to reach such backwaters since spawning is probably only successful in tributaries. This condition and its resulting shock may prevent survival, negating any potential benefits from backwaters.

2 (1318) Summary p. 45: Statement that mainstem reproduction does not occur in native and non-native warm water fish is refuted by Maddux, et al. and Minckley. What citations are used to support EIS statement?

1 (2202) p. 203, Column 1, ¶ 3, Biology: Expect to lose young humpback chub downstream to Lake Mead with these high flows but this should not hurt the population, according to W. Minckley. Young trout would be washed downstream but stocking would compensate for these losses.

1 (2039) p. 209, Column 1, ¶ 2: The word "likely" implies that access might not be possible at higher flows (8,000 cfs). Access to tributaries from the mainstream is only limited by low flows, in the range from 1,000 to 3,000 cfs (see Chapter 3).

1 (1882) Fish now exist in reaches of the river never possible before dam.

1 (2219) p. 212, Column 1, Paragraph 1: You should provide some rationale for concluding access will persist under steady flows. Fish unable to access a stream during one period of a day under fluctuating flows will get other opportunities as flows rise and fall, but these are denied under steady flows. Again, as stated before, we doubt access is a real problem anyway.

1 (1658) Document ignores very real possibility of eventual tributary access problems by fishes as a result of the reduction of flood flows and reduced action on debris fans.

1 (2206) p. 205, Column 1, ¶ 1: We are not aware of any data to support the speculation regarding limited access at different flows, other than incidental observations by Valdez at

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Nankoweap Creek. What studies were conducted on which tributaries to support this conclusion? This seems to create a problem where none has been documented. What conditions exist, other than waterfalls, to limit access? If flows fluctuated and fish were denied access at one flow, what would prevent their gaining access a few hours later when flows changed?

4 (0452) Backwater habitats have silted in during Interim Operating Criteria.

3 (0448) Interim Operating Criteria lessened sloughing of algae causing reduction in downstream drift.

1 (0761) Interim Operating Criteria seem to have benefitted food supply for fish. It's just a matter of time until we have better fishing.

1 (2029) p. 203, Column 1, ¶ 1: Given that all the alternatives include beach: habitat building flows as a common element, the point of discussing the negative impacts of flood frequency reduction measures is unclear. The flood frequency reduction measures were intended to prevent unwanted floods as a beach and bedload sediment conservation measure.

b. Native Fish Issues

1 (1563) p. 209–210, "native fish": By reference, the first sentence makes the effects of this alternative "somewhat" similar to the No Action Alternative (page 207-top, page 208-bottom). Table IV-8 indicates this alternative to be just as, or more, similar to the steady flow alternatives. We suggest this reference be deleted to allow the MLFF to stand on its own.

1 (2009) p. 111, Column 2, ¶ 3: Can a considerable reduction in numbers of individual fish and of fish species in the Grand Canyon since dam construction be documented given the paucity of data before the mid-1970s? In the absence of pre-dam, baseline data, this appears to be an insupportable claim and another example of this section's anti-dam bias and does not reflect good scientific reasoning.

1 (1864) Appear to be numerous environmental benefits to river regulation that mitigate to some extent the losses of the four native fish species.

1 (1660) A great deal of new, very pertinent data on native fish have been acquired since the time the DEIS was written that should be incorporated into the final document.

1 (2322) There should be a discussion of the beneficial uses of the native fish population other than they are a part of the ecosystem.

1 (2153) p. 106, Column 2, ¶ 3: Most native fish were essentially gone from the river before the dam was built, according to Carothers and Brown (1990), and 80% of the fish consisted of non-native carp and catfish. This issue remains absent from the EIS, thereby leaving the mistaken impression dam construction or operations were the sole or principal cause(s) of extirpation. This should be corrected in the FEIS.

1 (1371) p. 237: Reduction in daily fluctuations would also benefit native fish.

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1 (1775) Post-dam conditions have resulted in the decimation of native fish throughout the Grand Canyon.

7 (0845) Several species of native fish have been maintaining in fluctuating flow regime having successfully reproduced under Interim Operating Criteria.

1 (1432) MLFFA and ILFFA provide acceptable alternatives for enhancement of native fish species, limiting predatory species, and enhancing aquatic food resources.

1 (1445) p. 51: Insufficient scientific evidence to support statement that none of the alternatives increase spawning habitat for native fish. Probable that steady flows would enhance by making additional spawning sites available.

1 (1328) p. 51: Disagree that ILFFA would result in a relatively static environment. There is daily fluctuation that still adversely affects larval and young-of-year fishes.

2 (2006) p. 109, Column 1, ¶ 4, second sentence: "Forcing juvenile..." is pure conjecture. It would also be accurate to say that moving from eddies or nearshore environments at one river stage to other eddies or nearshore environments at another river stage may not cause direct mortality. There are no real data one way or the other. Is it not possible that with Low Fluctuating Flow Alternative downramp rates at 1500 cfs: hr, young fishes choosing to occupy nearshore environments could actually stay in the nearshore habitats as the water slowly fluctuates? If a fish stays at the water's edge during fluctuations, it will always be in a nearshore habitat. Why the insistence that it will be swept to its death in the mainstem if the water fluctuates?

1 (2199) p. 201, Column 1, ¶ 2: Comments on this page are repeated elsewhere in the text; however, where are the data documenting the decline in native fish populations under normal operations or showing that they would decline under the alternatives? The text should reference support for this conclusion as no pre-dam surveys of population numbers are available for comparison.

1 (2033) p. 204, Column 2, ¶ 1: The document states that under the No Action Alternative the native fish have remained stable or are gradually declining. If populations are stable, why the sense of urgency over native and endangered fish in the RPA? If populations are declining, then data supporting this should be presented in Chapter III. Perhaps the addition of information from interim flow studies should be included in this section identifying whether there have been increases, decreases, or stability in the native and non-native fishery.

1 (2220) p. 213, Column 1, Paragraph 3: What are the immediate risks to native fish of SASFA? What are the long-term benefits to the natives?

1 (1052) Warming of the river would benefit native fish if done in the correct way.

1 (1054) Cold water temperature is the main impediment to breeding and survival of the native fish in the main channel according to studies.

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1 (1603) p. 69, second column, second bullet: This point should be clarified by stating: "Low water temperature may affect food consumed, which may reduce growth of native and other warm water fishes." This last phrase should either be added to or used to replace the existing phrase.

1 (2103) p. 107, Paragraph 3: The statement that "water temperature is the over-riding constraint for native fishes in the Colorado River mainstem" is support for greater emphasis on selective withdrawal as noted above and the subjugation of endangered fish research flows to the Adaptive Management process as a secondary or tertiary element in native fish management.

1 (2155) p. 107, Column 1 ¶ 3: Imply rearing larval native fish without warm backwaters is impossible, yet chub have developed self-sustaining population in a warm tributary. Should describe variety of features needed by larval native fish (e.g., temperature, zooplankton, etc.) that may be present in a number of locations, including tributaries or backwaters. Adult natives able to thrive under present conditions and in generally better health than introduced trout. By maintaining cold water and introducing juvenile natives (e.g., from natural spawn in tributaries or other rearing sites), native fish population may be enhanced, whereas exotics would be held in check. Native fish presently extirpated could be brought back and existing species enhanced, possibly helping them to be downlisted or delisted. Why shouldn't a non-operational enhancement be used? Why no discussion of alternatives to mainstem spawning.

1 (2207) p. 205, Column 1, Paragraph 3: Agree if young are washed into mainstem, thermal refugia may be needed to survive; however, tributary recruitment may be adequate to sustain healthy populations without mainstem thermal refugia. Agree with statements regarding mortality causes (temperature shock and exposure to non-native predators supported by studies), but see no documentation to support hypothesis of energy expenditures causing direct mortality in native fishes. DEIS should delete phrase. Agree with statement effects on adults, limited to indirect effects through association with food base. Description of expenditure of energy for chub under normal flows as higher than under steady flows is incomplete. Food source also higher under normal flows than steady flows. Valdez' (Winter 1993) said condition of chub under normal operations better: higher than steady flows. (CREDA)

1 (1624) p. 211: Endangered fish research in 1993 found some evidence (limited) that native fishes may be spawning in the mainstem. Because of this, statements that this spawning does not occur should be tempered. Suggest following example: "Stabilization of flows might result in limited spawning habitat for native fish near warm water springs in the mainstem or near warm water inflow of tributary confluences. While spawning and recruitment from such areas may not be significant, some might occur."

3 (1312) Summary p. 38, & main doc. pp. 68–69: Discussion fails to acknowledge that three native species (bonytail chub, roundtail chub, and Colorado squawfish) have been extirpated from Grand Canyon.

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1 (1345) p. 107: It might be helpful to include that all life stages of bluehead sucker and speckled dace are found in the lower river reaches and all life stages of flannelmouth suckers are found in the lower reaches of the river.

1 (1366) p. 205: Wouldn't the flannelmouth be included with the bluehead sucker as being affected by chronic loss of year classes?

1 (1659) All the available research on young and young-of-year native fishes in the Little Colorado River was ignored in the EIS document; life history parameters of these critical life stages are relevant to mainstem issues (such as larval drift and food habits).

2 (2007) p. 109, Column 1, last paragraph, first sentence: Indicator for recruitment should be evidence of fish growing to adulthood and spawning within system, not some physical condition of river. Given existing environment of Colorado River, relationship between presence of stable backwater habitats (produced by steady flows) and native fish recruitment is unknown. Ascertaining that relationship is avowed purpose for incorporating experimental steady flows into Preferred Alternative. How can DEIS assume relationship exists and at same time call for experimental flows to determine whether relationship exists? Steady flows believed to enhance native fish recruitment. This paragraph negates need for results of proposed research program to prove or disprove it. Term "recruitment" appears to be used incorrectly here. In previous sections of document reader is led to believe mainstem water temperatures are insufficiently warm to allow recruitment in mainstem, "recruitment" being defined as a full life cycle of fish from spawn to spawn. Here, the term recruitment is used to mean young fish simply growing to adulthood. This confusion should be clarified.

2 (2010) p. 111, Column 2, ¶ 4: "Minimum reliable discharge is used as the indicator of tributary accessibility for reproduction, as it is for native warmwater fish." What does this sentence mean? It makes no sense. Also, "Growth of warm water non-natives is limited..." Limited by what?

1 (1559) pp. 204–205: Discussion doesn't provide perspective as to numbers: percent of native fish using near-shore or backwater habitat compared with those using tributaries. Is statement that shallow near shore areas along main channel are important nurseries for native fish exiting tributaries actual observations in Grand Canyon, or assumed from behavior of fish in Upper Colorado River system? How are young fish able to become established in shallow near shore areas of the mainstem Colorado River if there is no natural reproduction there and water is too cold.

1 (2154) p. 107, Column 1, ¶ 2: The diversity of species since dam closure has increased dramatically with the advent of more habitat diversity. If diversity were so great for native fishes, your statement would imply their numbers also should have increased. It may have been the lack of habitat diversity that allowed them to survive without much competition. The historic diversity of the canyon was limited and is much greater now. Seeking to maintain natural diversity when river conditions have changed so dramatically would be impossible. You should discuss this conflict.

1 (1657) Some important native fish issues were missed or glossed over. For example, habitat should be included as a "life requirement factor."

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1 (1248) Must do whatever is necessary to re-establish native fish habitat below Glen Canyon Dam reducing burden on limited habitat remaining upstream of Lake Powell.

1 (0164) Endemic fish species must be provided with best possible reproductive habitat.

2 (0957) FWS has not fully examined other alternatives to benefit native fish, such as transplanting populations.

1 (1766) Has Reclamation reviewed historic data showing larval native fish in Grand Canyon utilize nearshore habitat?

1 (0165) Have catch and release on native species.

1 (1771) Reclamation is dodging issue that FWS recommends steady flows to provide stable backwaters and stable nearshore habitat for increased survivorship of native fish.

1 (1765) Reclamation's allegation that no information was presented indicating flow patterns comparable to pre-dam would benefit native fish in system existing today is absurd.

1 (1774) Native fish evolved under pre-dam conditions for thousands of years, and needing years of study to determine whether return to pre-dam flow would benefit native fish is an absurd excuse of Reclamation.

1 (1533) p. 51, "FISH," ¶ 1: Is a "viable" population the same as a recovered or conserved population? FWS's objective to "closely mimic the natural, pre-dam ecosystem process" is unrealistic, as there are huge gaps between the spring flows of 80,000 to 100,000 cfs and low flows of less than 1,000 cfs of the pre-dam river and the proposed limits of 20,000 cfs and 8,000 cfs, respectively.

c. Non-native Fish Issues

1 (2159) p. 111, Column 2, ¶ 3: What information exists on non-native fish diets in mainstem and tributaries?

3 (0327) Theoretical floods will not get rid of exotic fish problem.

1 (2213) p. 207, Column 2, ¶ 2: The percent of reeds suggested as unaffected by flows is a meaningless figure unless you relate it to the affect on the population. Sustaining the population without stocking may require only 5% successful reeds if management continues to require catch-and-release or minimal bag limits.

1 (0169) Fish and Wildlife should not have put trout in the river.

1 (2161) p. 112, Column 1, ¶ 3: There is no comment on the variety of trout strains put in the river or any speculation on what these different strains may have contributed to successes or failures of the fishery. The Davis trout strain study for the Arizona Department of Game & Fish was not mentioned, yet it discussed these possibilities.

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1 (1166) Support efforts for self-sustaining trout population. However, endangered species must have precedence over trout in any conflicting management decisions.

8 (0442) No trout population pre-dam; now blue-ribbon fishery.

2 (2028) p. 202, Column 2, ¶ 1: This statement fails to explain how the rainbow trout fishery in the late 1970's and early 1980's achieved national recognition for exceptionally large trout. These trout grew to trophy size under conditions lacking in seasonal warming. The invertebrates the trout ate during this time, while certainly limited in species diversity, were sufficiently abundant to allow remarkable body condition in the "Lee's Ferry rainbows."

1 (2223) p. 213, Column 2, ¶ 3: The report describes a general decrease in size of trout at greater distances downstream from the dam. Other data show flow fluctuations to attenuate (decrease) at greater distances downstream from the dam. In view of this situation, it is incongruous to contend that a decrease in fluctuating flows will enhance growth of trout. The data suggest Lee's Ferry trout will continue to get smaller because flows will fluctuate less.

1 (1380) New trout population will be wiped out by 1995 beach building flows (45,000 cfs) at the end of the spawning season.

1 (1677) p. 112: Is it true that trout "parasitic infestation may have been a result of crowed and limited forage"?

1 (2162) p. 112, Column 2, ¶ 1: Enhancing the trout population may not be needed in the interim since problems in fall 1990 indicate there are already too many trout. Also, no mention is made of a Reclamation-funded study of alternative trout strains that may be better adapted to the unique tail water habitat. What would a different strain do to reduce the listed impacts?

1 (1350) p. 112, Col.2, ¶ 2, line 4: Is the adjective "crowded" used to describe forage or refer to the population numbers of trout?

1 (1335) p. 69: It could be argued that the decrease in abundance of trout is due to the increase in turbidity. Same could be said for cladophora.

1 (0266) The EMVSFA will possibly provide for a self-sustaining trout population.

1 (1763) How can SASFA threaten rainbow trout fisheries more than MLFFA, when obviously more reeds would be dewatered, more trout fry disappear down river with lower MLFFA base flows and fluctuating flows?

1 (2160) p. 112, Column 1, ¶ 2: You should give a brief status report on the last five years of stocking so the reader knows the magnitude and can judge its importance to recruitment and population maintenance.

1 (2165) p. 113, Column 1, ¶ 3: This blue ribbon trout fishery was started with hatchery fish and is sustained by hatchery fish. Naturally spawned fish have contributed little to the Lee's Ferry historic reputation as a blue ribbon fishery. Therefore, to dwell on the importance of

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spawning to the fishery is not warranted unless you give more reasons than public sentiment. Also, you have not cited any of the Phase II stranding study results in lieu of Maddux et al. Did the Phase II study results support the earlier work? If not, why not?

1 (1608) p. 113, first column, ¶ 1: Further documentation of the fish stocking from 1978 to 1981 in Little Colorado River downstream of Glen Canyon Dam, is found in U.S. FWS, 1980. This reference should be added at the end of the first sentence; complete citation found in letter. (FWS)

1 (2343) p. 112: Stocking of rainbow trout at Lee's Ferry must be halted until the effects on native fishes are known.

1 (2211) p. 206, Column 1, ¶ 1: The death of spawning trout seems to be an issue important only as it relates to the recreation activity since stocking is adequate to sustain the population. As a result, the paragraph is somewhat misleading. The consequences of the losses to the population described is probably negligible. Some comments on this issue are needed in this paragraph. We can understand access problems if the tributary is dry at the mouth or there is a waterfall, but how river flows affect access is not described. Also, we are not aware of any studies documenting the access problem for different species so how can you reach this conclusion? Page 70 of Chapter III does not discuss what may be affecting access or why it would change with different flows. We suggest some improvements in your explanation of the access issue.

1 (1561) p. 205, last paragraph: If about 78% of the juvenile trout sampled in August 1992 were considered to be naturally reproduced, then "low natural reproduction" would seem to be misleading, especially if present populations may be approaching carrying capacity.

2 (0880) Trout population maintained by stocking: not reliant on natural spawning and not significantly affected by stranding except for anglers upset when mature spawners become stranded.

1 (2163) p. 112, Column 2, ¶ 4: The issue of naturally-spawned fish is ill-defined. A desire on the part of the angler does not necessarily translate to a requirement. Obviously, natural recruitment is not needed to sustain the Lee's Ferry fishery. Why is natural spawning important?

1 (2200) p. 201, Column 1, ¶ 4: Since reproduction is not needed to sustain the trout population but is desired to sustain the trout fishery quality (i.e., the recreation quality), we suggest dividing the matrix into those two elements and comparing the importance of the alternatives. The percent of reeds suggested as unaffected by flows is a meaningless figure unless you relate it to the affect on the population. Sustaining the population without stocking may require only 5% successful reeds if management continues to require catch-and-release or minimal bag limits.

1 (2212) p. 206, Column 1, ¶ 2: The losses described under 1 and 2 due to angling was 25 times the losses due to stranding in 1988. Why not suggest controlling angling during the spawning season if 1 and 2 are important? Do the mortality assessments include the estimated mortality from hooking and releasing, which is probably higher now as bag limits

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have been reduced? Also, actual losses by angling and stranding imply that stranding increased by 5 times in three years. Is this true? Also, the ability of anglers to distinguish between hatchery-reared fish planted as fingerlings and caught at 18 inches versus river-spawned is questionable. This section could discuss this issue in terms of the consequences of using planted versus river-spawned fish to sustain the fishery.

1 (2037) p. 207, Column 2, ¶ 3: "However, successful hatching and rearing from larval stages to a size capable of negotiating the fluctuating water velocities would be less likely." This statement indicates that studies on changing water velocities and fish responses have been completed and that they are relevant to the situation in Glen and Grand Canyons. Do fluctuations in flow really mean fluctuations in water velocities in the habitats of the young fishes, and if so, a quantification of the habitat that is effected should be provided for various flows.

1 (2164) p. 113, Column 1, ¶ 1: We suspect the stranding conditions were less important below Lee's Ferry because anglers could not see stranded fish and thereby become concerned. You have not discussed the importance of stranding about 2,000 fish to a population of 150,000 fish. You should discuss the relative importance of this issue to the trout population and also to the angling public. This may help us to understand why "naturally" spawned fish are important.

1 (2166) p. 113, Column 2, ¶ 2: The issue of angler management is not included in this paragraph. If anglers desire it, perhaps a restriction on fishing during spawning season would be supported to help increase natural reproduction. The DEIS should speculate on the possible need to restrict trout impacts on native fish by reducing stocking.

1 (2218) p. 211, Column 2, ¶ 3: The suggestion trout in the system will be enhanced fails to evaluate the entire system. A change in algal productivity below Lee's Ferry as described above would affect trout growth and condition. This section should discuss trout habitat differences throughout the canyon, not just above Lee's Ferry.

1 (2168) p. 114, Column 1, ¶ 2: Availability of Cladophora described in the last sentence may be due to light and turbidity. Again, with an effort to reduce the amount of Cladophora detached, what will happen to this food source for trout in the areas downstream of the Little Colorado River? The Bel-Aire strain is likely to be incapable of achieving trophy status (i.e., >22 inches). This was a finding in the Davis trout strain study and should be discussed here. Also, Janisch has speculated that many of the poor fish in the slot are simply old Bel-Aires that have not grown (or cannot grow larger). This is a significant point worthy of discussion here.

1 (2210) p. 205, Column 2, ¶ 5: This paragraph should discuss competition between young trout in tributaries and larval native fish as mentioned earlier. Also, no mention is made of any studies of trout food sources below the Little Colorado River or in other tributaries. Cladophora is generally replaced as the dominant algae by Oscillatoria in lower reaches of the canyon. Your statement regarding Cladophora being the index for the rainbow trout growth and condition should be explained in this context.

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1 (2167) p. 114, Column 1, ¶ 1: In the late 1970's, late winter stomach contents of trout were filled with shad. These may have helped produce the big trout, but no discussion of this possibility is provided. These shad may have given the needed piscivorous diet to help boost the trout to the larger sizes.

1 (1351) p. 114: Is it the summer temperature of tributaries that become unsuitable for trout rather than mainstem summer temperatures?

10 (0170) The trout thrive because of the cold water that resulted from building the dam.

1 (2011) p. 112, Column 2, ¶ 2: The last sentence of this paragraph alludes to improvements in trout condition as a function of interim operations. Reader should be given information on what was: is different about interim operations that led to improvement in trout. Reader should at least be referred to the sections in the EIS (i.e., p. 30, p. 176) where some results of the interim operations are discussed. Additionally, it may be appropriate somewhere in the document to give a summary of what is known about interim operations "experiment." It has been said during Cooperative Agencies' meetings that considerable "healing" of canyon resources has taken place. If so, can this be documented?

4 (0450) Interim Operating Criteria believed factor in massive die-off of trout.

1 (2344) p. 114: Rainbow trout... have been implicated as possible predators of native young fish and eggs in some tributaries." Why are no mitigation measures or further studies proposed for this problem?

2 (2030) p. 203,5,6,10: On 2 March 1994 during a meeting on the FWS Biological Opinion, fishery biologists stated that floods three orders of magnitude over base flows would be needed to effectively displace non-native fish. If the base flow were 10,000 cfs, the flood would have to be 1,000,000 cfs—four times the dam's release capacity! It is essential that this issue be fully explained in the EIS. The authors of the fishery section suggest periodic "flooding" as the mechanism for suppressing non-native fish populations in an otherwise steady-flow regime. The possibility of using such floods is one of the reasons they believe steady flows in Grand Canyon will not benefit the non-native fish to the detriment of the natives. But they do not deal with the crucial question of magnitude.

1 (2157) p. 110, Column 1, ¶ 1: Striped bass were caught below the dam during the high flows of 1983–84 indicating passage from Lake Powell. Which non-natives use the Little Colorado River, and which ones exist in the river and are precluded from the Little Colorado River? What conditions exist in Little Colorado River that preclude use by some non-natives? Why hasn't the DEIS explored alterative ways to control non-native interactions?

1 (2209) p. 205, Column 2, ¶ 1: Removal of non-natives is impossible, but perhaps cold water could be used to control their numbers. This is why habitat improvements to foster better warmwater conditions may be the wrong approach to improving the numbers of native fish, at least in the canyon. Data should be given and the mechanism described to support the conclusion regarding fluctuating flows, not cold water, reducing numbers and species of non-native species.

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1 (0166) If non-native fish multiply, let fisherman catch them.

6 (0167) The introduction of non-native fish has had significant adverse ecological impact.

4 (0445) Pre-dam ecosystem processes cannot be recreated due to permanent non-native fish populations.

1 (1564) p. 211, "Non-native Warmwater and Coolwater Fish": This paragraph should state that of the alternatives under consideration, the steady flow alternatives have the greatest potential for enhancing conditions for non-native warmwater fish (Table IV-8).

1 (1431) Potential utilization of riverine lower canyon reached by striped bass for spawning and seasonal occupancy is poorly understood and inadequately addressed in DEIS. Fishery important to Lake Mead, and impacts on this fishery of operational changes should be addressed.

d. Predation

1 (2041) p. 211, Column 2, ¶ 3: "Stable backwater areas could benefit competitive growth for some non-native fish.." This statement is somewhat confusing. What is "competitive growth"? It seems to indicate that the non-natives might be able to out-compete the native fish for resources that enhance growth.

2 (0879) Non-natives implicated in decimation of natives prior to dam closure.

3 (1287) Success in creating ideal habitats for native fish hinge on precluding increased use of these habitats by non-native fish.

1 (1065) FEIS should contain analysis of the measures to be taken to protect native fish species from predation and competition from non-native species like striped bass and trout.

1 (1868) Despite "natural conditions" in lower Green River reaches support a fishery that is dominated by non-native fish over native fish by ratio of 100 : 1.

5 (0953) Water temperature increases may favor native over non-native fish causing problems (like those seen on Little Colorado River).

1 (1837) SASFA flow regime will advantage native fish species over non-natives because seasonal variations mimic conditions in which they evolved and to which they have adapted.

1 (1839) SASFA flow regime will advantage native fish species over non-natives because sustained high flows create backwater habitats in eddies and pond water in tributary mouths, reducing downstream transport of larval fish.

1 (1838) SASFA flow regime will advantage native fish species over non-natives because sustained spring high flows displace and wash non-native fish downstream.

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1 (2004) p. 106: This paragraph exemplifies the document's bias toward placing primary responsibility for the decline of the Grand Canyon's native fishery on the Glen Canyon Dam and depreciating the role of predation by introduced species. Primacy is given to the impacts of dams; predation is assigned secondary or even less of a role. Minckley (1991) declared that suppression of the non-native fishes is essential to the recovery of the native fish fauna. In other systems where rivers have not been modified by major dams, even in unregulated reaches of the Colorado River system, the native fish fauna has succumbed to competitive and predatory pressures from non-natives. Yet, suddenly, the situation has become unclear. Non-native fishes may compete!

1 (2102) p. 106, Paragraph 4: Contains an inaccuracy that is indicative of the authors' bias for dam-related effects as the primary cause for decline in native fishes and neglecting the role of predation and competition by non-natives. The paragraph states: "Construction of major dams has modified flow extremes, cleared and cooled the waters, converted rivers to lakes, and cut off natural movement corridors. In addition to these physical modifications, fish not native to the Colorado River Drainage have been introduced and may compete with or prey upon the natives" (emphasis added). This statement relegates the role of non-native species predation and competition in the decline of native fishes to a minor and conjectural status. The statement should be changed to indicate that non-natives do compete with native species.

1 (2104) p. 108, Figure III-27: This figure graphically presents the most simple expression of the potential for competition between native and exotic warm-water fishes should mainstem temperatures be increased. This fact should be made clear when the figure is referenced on page 107, paragraph 3.

1 (2156) p. 109, Column 2, ¶ 4: You do not mention that Carothers and Brown (1990) cited evidence that 80% of the biomass consisted of carp and catfish at the time of dam closure. This should be mentioned here. The fact non-natives are impacted by cold water should be explored as an alternative way to both enhance native fish and also depress non-natives. A viable alternative may be to keep cold water and augment (naturally or artificially) native fish with large numbers of a life stage that are capable of surviving cold water. If we attempt to return to habitats more conducive to warmwater fish, non-natives would probably dominate natives again.

1 (1545) p. 111: Non-native fish species, including channel catfish, large mouth bass, and green sunfish are referred to as "potential" predators that "may" prey on native fish. These qualifying statements in the text should be removed, or at least modified to say that predation and competition does occur among these fish and endangered native fish, but degree of impact to endangered native fish has not yet been determined.

1 (2158) p. 111, Column 1, ¶ 1: This paragraph fails to explore the Lake Mohave situation. Carp predation of razorback eggs and larvae has been reasonably well documented, and this impact should be discussed as it relates to historic predation in the canyon. The DEIS should speculate on the possible need to restrict trout impacts on native fish by reducing stocking. You could discuss the possible direct and indirect competition between a 4-month-old fingerling trout spawned in February with a newly-hatched larval native fish. Is it possible these young trout are foraging on the newly-hatched native fish or at least consuming their food or using their space?

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2 (2008) p. 111, Column 2, ¶ 1, first sentence: Would be as true without the phrase "living in altered habitat" as it is with it. Phrase adds nothing but implication that competition from non-natives restricts or excludes natives only in a physically altered habitat. This impression is not accurate. Examples exist of river systems that have been altered only by introduction of non-natives (with no alterations of the physical habitats) that are now dominated by non-natives. This sentence should be deleted or rewritten to read: "Native fish competing with non-native fish for limited resources in both physically-altered and unaltered habitats most often have been restricted, or even excluded, in their native range."

1 (1612) p. 126, second column, ¶ 2: After the first sentence "non-native fish species are often...," we suggest adding the following sentence: "See previous section FISH, Non-native Warmwater..." The last sentence should be replaced with: "Rainbow trout have not been found detrimental to humpback chub and studies are continuing to monitor this assertion. Following exceptional production of humpback chub in Little Colorado River in spring 1993, an examination of trout stomachs found small but diagnostic humpback chub bones (FWS).

1 (2198) p. 200, Column 2, ¶ 3: The dam's cold water releases are likely responsible for stunting populations of warmwater non-native fish that prey upon or compete with native fish. Without this stunting, historic trends suggest the native fish would likely be in worse shape today. All efforts to provide better habitat for young native fish would be for naught if predatory and competing non-native fish are able to take better advantage of the improved habitat.

1 (1362) p. 201: Native fish are limited by temperature and daily fluctuation under HFFA and MFFA. Shouldn't temperature be limiting growth of non-native fishes under all alternatives, not just the first four?

1 (2035) p. 205: Habitat conditions do not present themselves in a regulated environment. Some EIS alternatives would create more suitable habitat conditions for non-natives than would others. The NAA (historic flows) created less suitable habitat conditions than would, for example, the SASF Alternative or the Preferred Alternative. In fact, some fishery biologists believe that cold water releases during the 23 years of NAA operations prevented non-natives from dominating the native fishery that remains in Grand Canyon tributaries. Recommend a statement like the following: "None of the alternatives would eliminate the threat of non-native fishes competing with and: or preying on the native fish."

1 (1562) p. 208, second column, ¶ 2: What is the logic and scientific evidence supporting the assertion that periodic, short-term habitat maintenance flows would offset potential non-native fish benefits in stabilized backwater habitats? Do we understand the timing and duration of non-native spawning that well in the Colorado River below the Glen Canyon Dam?

1 (1625) p. 213: Our reading of this section is that non-native fish have as good a chance to survive as the native species. FWS believes that the native fishes will benefit more than non-natives because most of the river is still a canyon environment with riffles and rapids, mainstem water temperatures will not change appreciably, and seasonal variability will occur.

1 (2221) p. 213, Column 1, Paragraph 6: Steady flows would allow sediment to drop out in backwaters, thereby clearing the water and exposing larval fish to heavy predation by

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terrestrial and aquatic predators. Mainstem spawned larvae probably will not survive to reach any backwater refugia due to disorientation from cold water. The DEIS should provide some discussion of these concerns.

1 (2222) p. 213, Column 2, Paragraph 2, Non-native fish competition: Evidence exists that exotic, non-native fish presently existing in the Colorado River are less able to cope with high flows than rare native fish that evolved under such conditions. Would a reduction in high flows enhance survivability of exotics? Would increased survival of exotic fish increase their competitive advantage over native fish populations?

1 (2042) pp. 216–217: These pages provide a good description of the habitat: beach-building and habitat maintenance flows and their expected impacts on vegetation. The fisheries section would be well served with a similar treatment.

1 (2255) p. 240, Column 2, ¶ 1: The reference cited strongly implicates cold water temperatures in the demise of non-native warm water fish. The reference also cites turbidity and water chemistry, but does not cite fluctuating flows as causing adverse effects. This paragraph needs to be revised to reflect actual causative agents.

5. Vegetation - 123 statements dealt with this subject.

a. Definitions

1 (1827) Prefer words "biological pollution" to "naturalized community" used in DEIS because system is not naturalized.

1 (1813) Vegetation discussion should conform to similar breakout of exotics and natives addressed for fish.

1 (2012) pp. 114–119: This section could serve as a model for the needed rewrite of the Fish section. The discussion appropriately focuses on exploration of "existing conditions and how they reflect the pre-dam environment and current dam operations."

1 (1831) Vegetation categories should include percentages for climax vegetation—permanent beach climax and floodflow climax.

1 (1814) Strong need to name indicator species if they are to be used in gauging riparian health.

1 (2226) p. 215, Column 1, ¶ 4: On what basis is the assumption that errors in estimates of vegetation coverage (presumably acres?) would be consistent across alternatives?

1 (2171) p. 115, Column 2, ¶ 2: The acreage information on OHWZ and NHWZ vegetation are attributed as [Stevens unpublished data, 1992]. The work done by the Bureau's biologist Mike Pucherelli (1986, 1987) should provide additional information on acreage figures for OHWZ and NHWZ vegetation in Grand Canyon. Given the paucity of information, it seems imprudent to ignore potentially relevant data.

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1 (2169) p. 114,117, Column 2, Paragraph 2: We agree that "There is a dynamic interaction between water and plants in the riparian zone; the availability of water supports plants that could not otherwise survive in a desert climate, and the type of vegetation that survives reflects the water regime that supports it." Please provide specific information to allow the reader to determine the relationship between elevation above sea level in riparian communities along the Colorado River in Grand Canyon and the river stage. Figure III-28 is not detailed enough to provide this information to the reader. Given the aforementioned quote, this rudimentary detail seems critical to the presentation of existing conditions.

b. General Impacts (To All Types of Vegetation)

1 (2224) P. 215, Column 1, ¶ 1: Is this blanket disclaimer (of models used) a result of incomplete research results? If so, how comfortable are you in recommending an alternative that proposes to change so much?

6 (0171) The dam is an obstacle to the presence of a normal riparian environment in the canyon.

1 (1796) Dam favors permanent beach community over more natural and historical floodflow climax with interrupted successions.

1 (1571) p. 222, ¶ 4: It is not clear how delta formation processes would form above full reservoir elevations and eventually result in permanently vegetated sediment deposits. Would not most deposits be laid down under less than full reservoir conditions?

4 (0172) Flows should be limited to those that do not harm the flora.

9 (0174) Moderate the flow from the dam to ameliorate harm to fish and riparian life in the canyon.

2 (0875) During early years of dam operation, less drought resistant vegetation, like mesquite, declined in OHWZ replaced by upland plants, like barrel and cholla cactus.

3 (0437) Pre-dam fluctuations dictated vegetation distribution and density; little canopy. Mostly desert stream forms (hackberry, mesquite, acacia).

4 (0436) Pre-dam flood flows prevented riparian vegetation from growing in the scour zone. Narrow zone of 1870 acres existed. Now wet and dry marshes exist.

6 (0876) During early years of dam operation, riparian vegetation increased by 2,000 acres in contrast to decline in nearly all other rivers of the Southwest.

1 (2170) p. 115, Column 1, ¶ 2: We agree that, "Because of the dynamic interaction between riparian vegetation and water availability, changes in dam operations that change specific water-release patterns would be expected to affect the abundance and distribution of plants." Please provide factual information regarding the nature of the "...specific water-release patterns..." Given the dynamic interaction between water and riparian plants, these rudimentary details seem critical to the presentation of existing conditions.

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1 (2233) p. 218, Column 1, ¶ 3: Agree that over the long-term, stage reduction will affect woody riparian plants in the upper elevations of the NHWZ. Why is no alternative-specific analysis of habitat loss provided? Figures IV-13 and IV-14 do not indicate that woody plants in upper elevations of NHWZ would be adversely affected. Contradicts statement in Column 2, Paragraph 2, p. 217. These points are also relevant to preservation of critical habitat of southwestern willow flycatcher. Does habitat loss at upper elevation of NHWZ affect patch size of nesting substrate for southwest willow flycatcher? How would abundance of mesquite be affected by beach: habitat building flows? What other plant species would be affected, and what are impacts of beach: habitat building flows on their abundance. Any impacts of beach: habitat building flows on species composition within NHWZ?

1 (2232) p. 217, Column 2, ¶ 2, Riparian habitat: Vegetation and animals associated with the stream side could be harmed if water elevations are dropped three to four feet as proposed. Soils periodically wetted under present flows would become dry and plants would, under the best conditions, undergo stress while roots were extended downward or, under the worst, die from lack of water. Marsh and wetland habitats maintained by periodic wetting would be stressed or destroyed by a continuous water elevation three to four feet below present elevations.

1 (2114) p. 220, Paragraph 7: This paragraph repeats the inadequate treatment that is given to the inclusion of endangered fish research flows into MLFFA.

1 (1881) Further reduction of water levels will increase riparian growth and reduce watershed yield additionally (phreatophytes).

1 (1823) Use term "floodflow climax community" and define how lower floodflows result in different climax of riparian vegetation.

1 (2173) p. 117, Column 2, ¶ 2: Document states: "Thus, daily fluctuating releases from ... NHWZ to sites at lower elevations." Two questions must be addressed: 1) Do daily fluctuating releases from Glen Canyon Dam also influence expansion of vegetation from NHWZ to sites at higher elevations? 2) Does process documented within OHWZ by the EIS (replacement of long-lived, mesic-adapted species like mesquite by long-lived, xeric-adapted species like barrel cactus), seem likely to occur if upper elevations of NHWZ are affected by a changing water regime? Provide sufficient detail for reader regarding these elements. Equating 500 cfs changes in stage with a 0.2 foot change in surface elevation of river is insufficient. Finally, as this is largely an impact related to alternatives, it seems most appropriate that this discussion be added to Chapter 4 in adequate detail.

1 (2174) p. 117, Column 2, ¶¶ 2–3: Are there studies of vegetation in the NHWZ by which to compare fluctuating flow versus maximum flow impacts on vegetation establishment? The same comments and questions raised in code number 2173 are relevant with respect to species composition.

1 (2045) p. 223: In the last sentence under Restricted Fluctuating Flows, it is unclear what the "amount of reduction" is in reference to.

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1 (2234) p. 218, Column 1, ¶ 2, Riparian vegetation in OHWZ: Glen Canyon Dam has moderated flood flows. Riparian vegetation formed by flows from 60,000 to 120,000 cfs. may be lost if high flows do not return. Present maximum release is about 41,000 cfs unless the reservoir is full and spilling. This maximum volume cannot be altered by changes in release patterns. How does changing dam operations affect the OHWZ under these circumstances?

1 (2231) p. 217, Column 1, ¶ 1: The EIS states that flows of at least 40,500 cfs are necessary to deliver water to the entire NHWZ. What is the impact of removing this water source on NHWZ vegetation coverage in acres and species composition at the upper elevation of the existing NHWZ under each alternative? Why is there an upper limit to the NHWZ, and why would the upper limit persist at a lower maximum flow stage?

1 (2240) p. 223, Column 2, ¶ 2: Most riparian vegetation occurs at and is affected by the maximum stage of dam releases, but studies have not shown any affect on these vegetation by daily hydropower releases below the maximum stage. If so, the mechanism for reduction should be discussed.

1 (1570) p. 220, ¶ 2, under VEGETATION: It should be mentioned that the Maximum Powerplant Capacity Alternative may also be the best alternative for maintenance of the OHWZ due to more frequent high flows watering this area.

7 (0361) Upper level plants would receive periodic watering if the 25,000: 4,000 flow changes were adopted.

3 (0877) 50% of new riparian plants killed by floods of mid-1980's due to drowning, burial, and scouring.

1 (1567) p. 218: A point should be made here that reduced fluctuations and fewer floods will cause the riparian zone to move down closer to the new lower river elevation, thus making it more susceptible to serious impact from future floods.

1 (2172) p. 115, Column 2, ¶ 3: We agree that "reduced flood frequency (a change in water regime) has permitted upland plants to move into some OHWZ areas."

1 (2237) p. 222, Column 2, ¶ 2: Riparian vegetation below Colorado River dams has increased dramatically as a result of the reduced flood frequency and this increases biodiversity by providing habitat for many more species of birds and other animals than existed pre-dams. This situation should be mentioned.

1 (1626) p. 218, ¶ 2, first sentence: This sentence should be modified to clarify that "Recruitment...in the OHWZ is assumed to require conditions historically created by periodic high flooding," so that the public is not lead to believe that this could be accomplished by beach: habitat building flows. It might be useful to give a figure, perhaps 100,000 cfs.

1 (2230) p. 216, Column 2, ¶ 1: The EIS states, "However, it is assumed that maintenance flows would not affect the area of vegetation (acres?) to the degree indicated by active width analysis." What is the rationale, in detail, for this assumption? Given the dynamic

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interaction between water and riparian plants, these rudimentary details seem critical for an evaluation of impacts and should be supplied.

1 (2236) p. 220, Column 2, ¶ 2: What is expected effect of "habitat maintenance flows" of 31,500 cfs on riparian habitat above present maximum high water mark? How did spills (i.e., flows above power plant capacity) under past reservoir operations affect riparian zone? How would same spill frequency affect new riparian zones created under moderate, low, or steady flows if these zones are lower in elevation? Are riparian areas an energy: organic source to aquatic system? If yes, how would steady flows differ from fluctuating flows in contribution of energy: organic material to aquatic system?

1 (2044) p. 221: This table gives an expected level of disruption of the riparian vegetation with habitat maintenance flows, but does not provide a similar estimate for the beach: habitat-building flows. We understand that the latter are not as predictable as the former, but some explanation should be provided within the footnotes to this table for this apparent oversight.

1 (2229) p. 216, Column 1, ¶ 1: What information is available that addresses response of the riparian zone to the stress of inundation? The habitat maintenance flows should serve to destabilize and inhibit the coverage in acres and affect species composition. What characteristics of the habitat maintenance flows and woody vegetation will be monitored? A ten day flow, assumed for evaluation of alternatives, may drown woody riparian vegetation. Rudimentary information of some form must be available within GCES. How is it concluded that "plants that survive burial will grow up through new deposits and contribute to an increase in area of riparian vegetation." Does this mean that if plants are not buried the increase in area of riparian vegetation would not be as great?

1 (1507) Summary p. 22, Habitat Maintenance Flows: There is a great deal of untested faith being placed in habitat maintenance flows. Short-lived, low elevation beaches may be enhanced, but other beaches will be eroded. Vegetation will not be completely removed and will eventually occupy most sites unless physically (and "unnaturally") removed.

2 (1240) Lower interim flows have increased riparian vegetation providing increased habitat; steady flows would harm.

3 (0446) Interim flows accelerate decline of high water zone vegetation and species in upper high water zone. Decreased water levels resulted in many riparian plants dying.

1 (2241) p. 224, Column 2, ¶ 2: Are interim flows impacting and reducing numbers and sizes of these marshes?

1 (2013) p. 117: References are again made to interim operation conditions in this section. Some explanation of results of interim operations is necessary if such references are to be made.

1 (2235) p. 220, Column 1, ¶ 4: Studies using plot data concluded a 12% increase in salt cedar has occurred since 1986. Has there been any attempt to verify the 12% increase by using aerial photography?

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1 (2227) p. 215, Column 2, ¶ 1: The EIS states that "Area coverage and species composition of vegetation during this period would stabilize within the constraints of sediment and discharge characteristics of each alternative." This statement implies that area coverage and species composition are presently approaching stability. This is supported by Pucherelli's (1986) findings referenced in Column 1, Paragraph 1, Page 117. If the NHWZ is approaching a stable state with respect to area coverage and species composition, what are the impacts of introducing new, changed circumstances of water releases?

1 (2228) p. 215, Column 2, ¶ 2: Footnote 1 of Table IV-10 says no relationship exists so why is this assumption used? Also, this method inserts a lot of bias into the analysis. Lower stable flows appear to have more active width because the slope of low elevation sand bars would be less than upslope and thus give more active width per unit of stage height. Some explanation is needed.

1 (2225) p. 215: What parameters were considered when selecting a short-term period of 5 to 20 years? Is this based on anticipated changes in sediments? Are there more biologically relevant considerations?

1 (2175) p. 118, Column 1, ¶ 1: The importance of geologic strata is also relevant in how vegetation is distributed. Quite simply, softer strata (i.e., Bright Angel shale) provide more opportunities for development of extensive riparian habitats than harder strata (i.e., schist).

c. Native Vegetation

1 (1812) Increasing diversity of canyon's flora: fauna marks a decline in health of riparian ecosystem, whose native diversity is growing shallower.

d. Non-native (Exotic) Vegetation

4 (0397) Fluctuating flows have allowed takeover of nonnative vegetation.

1 (1798) Exotic species increase diversity, but degrade system; that is problem in Grand Canyon.

2 (1953) Should river corridor management efforts include controls or techniques to eliminate exotic plants?

1 (1952) To what extent have dam operations contributed to the proliferation of tamarisks and other nonnative plants along river corridor and along banks of Lake Mead and Lake Powell?

1 (2243) p. 231, Column 2, ¶ 1: Since Tamarisk is more prevalent above the maximum flow elevation than in the fluctuating zone, what evidence exists to suggest that Tamarisk would be any less (or more) prevalent under steady flows than under fluctuating flows?

1 (2244) p. 231, Column 2, ¶ 4: In one study, normal operations are said to enhance growths of the exotic Tamarisk, which is deemed to be undesirable. Another study said normal operations damage riparian stands of Tamarisk that are used by various animals, and this result is deemed to be undesirable. Which conclusion are we to believe? Are there any data

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to suggest a competitive advantage to Tamarisk created by normal operations or that native plants would have a competitive advantage under any other operating scheme?

e. Marshes and Marsh Vegetation

3 (0447) High elevation wet and dry marshes have diminished in size under Interim Operating Criteria.

7 (0362) Higher elevation wet and dry marshes would grow in size and number if the 25,000: 4,000 flow changes were adopted.

1 (1519) Summary p. 47, Last paragraph under "Effects of the Alternatives": Again, it needs to be recognized that fluctuating flows create and maintain marsh and backwater habitat over the long term, whereas the effects of managed high flows at maintaining marshes and backwaters may prove ineffective.

1 (1573) p. 234, first column, ¶ 3: What is the basis for the assertion that marsh vegetation can be supported by a short-duration high flow, such as beach: habitat building flows?

1 (2176) p. 118, Column 2, ¶ 2: How does the productivity in Grand Canyon compare with marsh productivity elsewhere on the Colorado River? Are there studies of lower Colorado River marsh production that could be used for comparison with Grand Canyon marshes? How can your data help differentiate between effects of fluctuating flows and 1983–86 floods in context of marsh studies?

1 (2177) p. 118, Column 2, ¶ 3: How were fluctuating flow effects addressed in marsh studies? Does this design get at the question of how fluctuating flows affect marsh productivity? If not, how can the studies help us reach a conclusion regarding the effect of fluctuating flows on marsh productivity? Were there "controls" used in any studies for comparison without fluctuating flows? If so, how were they designed?

1 (2014) p. 119: Do we really have data indicating that marsh plants have increased in the Lake Powell area since the floods of 1983? There are data for Lake Mead, but what studies have been done on Lake Powell?

1 (1568) p. 219, first column, last paragraph: How can it be assumed that emergent marsh plants can be maintained (the implication is that they would remain relatively unchanged) by occasional habitat flows lasting only a week? It seems that potentially significant impacts to marsh vegetation are not being addressed here.

1 (2043) p. 219, Column 2, ¶ 3: Beginning at the third sentence, the intent of the paragraph is very unclear. It appears that change in maximum flow is used as an indicator for marsh plants, but then follows up with a statement that maximum flow has no relationship to marsh plants.

1 (1569) p. 219, second column, penultimate paragraph: Reduced flows may create additional sites at lower elevations for the short-term. What is not mentioned is that the reduced flows

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would also be expected to result in a new sediment equilibrium regime that would change the existing situation, with unknown long-term results in terms of number and size of sites.

1 (1627) p. 219: Last sentence on this page contains statements about marsh plants that do not coincide with the matrix on p. 221. This apparent discrepancy needs clarification.

1 (2238) p. 222, Column 2, ¶ 5: Marsh vegetation occurs in the fluctuating zone near the maximum stage height presenting a habitat not present along the Colorado River in Glen or Grand Canyon prior to the dam. The maintenance of habitat and diversity of species by the alternative should be discussed.

1 (2239) p. 223, Column 1, ¶ 1: Were normal operations creating an explosion of fluvial marshes in the Grand Canyon, or is it too soon to attribute the increase to any particular factor? If yes, what quantitative data are available to support the conclusion?

1 (1629) p. 230: For emergent marsh, it is not clear what the percent decreases in Table IV-11 represent. For example, it is not clear that a 29% decrease under the MFFA represents a reduction in the amount of NHWZ vegetation under NAA and: or area that potentially could be colonized by emergent marsh plants. Presumably, the table is comparing short-term future actions with NAA.

f. Habitat

1 (0173) Let the vegetation naturalize. The birds will nest somewhere else.

6. Wildlife and Habitat - 47 statements dealt with this subject.

a. Preservation

15 (0177) I am concerned about the preservation of wildlife habitat.

6 (0279) Preserve as closely as possible the natural habitat of the Glen Canyon Area.

2 (0742) Does Reclamation have jurisdiction over indigenous wildlife or do states and counties? Has Reclamation consulted with county and state governments? Decision can't be made until addressed.

1 (1792) Kaibab squirrel, which is geographically isolated, remains one of unique animal features of the Canyon.

1 (1611) p. 122: Additional information exists on leopard frogs above Lee's Ferry. This section should be updated. Although surveys are limited, leopard frog is considered very rare in Grand Canyon, with recent sightings limited to Cardenas Marsh and Glen Canyon above Lee's Ferry. Between 80 and 100 individuals were located in Glen Canyon in 1993, primarily in marsh area that is spring-fed and not directly dependent on flows from Glen Canyon Dam. However, experimental high flows or floods have potential to negatively impact frogs and: or habitat. (FWS)

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1 (2017) p. 122: The information presented here on mallard densities in Glen and Marble Canyons is very important. Prior to interim operations, breeding mallards were rare to non-existent in this area. It should be pointed out that these densities are "recent" and a direct response to changes in the land: water habitats under interim operations. Again, we see the need to summarize what we know about discharge and system response under interim operations.

b. Impacts

1 (1697) The regulated flows from the dam have allowed the generation of hundreds of acres of new vegetation for wildlife use.

6 (0438) Limited species of wildlife pre-dam; wintering wildlife did not occur. Now increase in diversity of birds, mammals, reptiles, and insects; wintering waterfowl on increase.

1 (1728) Preferred Alternative is only alternative lacking benefit comparisons to native fauna.

1 (1962) SASFA would have a beneficial impact on wildlife habitat.

1 (1862) SASF, with dynamic flow adjustments to reflect current annual environmental conditions, would provide conditions favoring native amphibians, reptiles and ground-nesting birds.

1 (1628) p. 229: Even though individual animals can "move as required" by daily fluctuations, some invertebrates or herpetofauna may not be as quick to move as large animals. We do not know the capabilities of the adult leopard frogs' population in Glen Canyon to escape high flows. Aquatic insects, tadpoles, and their eggs could be lost.

1 (0175) I am 100% against high maximum releases during April, May, and June as high flows during these months will endanger the nests of neotropic song birds whose wintering sites are under pressure from rain forest destruction.

4 (0178) The temperature of water releases is also a significant factor on the well-being of wildlife downstream, and current cold releases are often toxic to flora and fauna.

1 (1009) p. 232: Edit second paragraph under "Restricted Fluctuating Flows" to reflect that beach: habitat building flows may have short-term effects upon population numbers, but potential long-term benefits for habitat.

1 (2242) p. 229, Column 2, ¶ 2: How would annual, high spring-time releases affect birds such as black-chimed hummingbirds, Bell's vireo, summer tanager, hooded oriole, southwestern willow flycatcher, etc. that are nesting in the riparian zone?

1 (1610) p. 122, ¶ 3: The last sentence states that violet-green swallow nests were affected by flows above 40,000 cfs. However, figure III-30 states that this species nests high in cliff places. Clarify how flows above 40,000 cfs affect this species.

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1 (1546) p. 124, first column, last paragraph: States that changes in discharge patterns affect tributary vegetation species and thus the insects associated with them. While some vegetation in and around the mouth of tributaries could possibly be affected, the effects do not extend to impact insects along the entire tributary, as is inferred here.

c. Other

1 (2016) p. 120: This appears to be the only case where a special status species, the spotted bat, is included in the appropriate section. It is not mentioned in the Endangered Species section.

7. Endangered and Special Status Species - 1,826 statements dealt with this subject.

a. Legal Mandates

4 (0336) Secretary of Interior cannot make a decision that constitutes jeopardy to the Hump-back Chub or any endangered species according to § 7 of the Endangered Species Act.

3 (0337) Only Congress has the authority to grant relief from provisions of § 7 of the Endangered Species Act.

1 (1547) p. 125, ¶ 2, second column: It is mentioned that the genetic identity of the humpback chub throughout Grand Canyon is being investigated in a basin-wide study of genus Gila, and possibility exists that chub in Middle Gorge and lower Grand Canyon represent separate population. No mention of how confirmation of such a condition could or would affect recovery efforts and elements of Section 7 Alternative.

6 (1924) The economic cost of the MLFFA is justified by increased protection of endangered species required by § 7 of Endangered Species Act.

1 (1229) Glen Canyon Dam must be operated so hydropower, temperature, sediment, etc., work to improve condition of endangered fish if Reclamation is to meet Endangered Species Act goals of species recovery.

1 (1225) Although new ecosystem does exist, does not absolve Reclamation of Endangered Species Act responsibility and: or legal precedent that endangered species must get highest priority.

1 (1224) Fluctuating flows like those in Preferred Alternative identified as cause of mortality to young fish; could subject Reclamation to liability under § 9 of Endangered Species Act.

1 (1223) The Preferred Alternative's impact on habitat was not part of Draft Biological Opinion, so Reclamation must consult with FWS to ensure actions won't adversely modify critical habitat.

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b. Impacts to Endangered Species (including pre-dam and post-dam comparisons, impacts of flows, temperature, predators etc.)

4 (0183) The loss of native and endangered species so that the power company can make a profit is unacceptable.

1 (1914) Present operation of dam releasing high flows to provide peak power doesn't begin to compare with problems these species had during the floods that occurred pre-dam.

1 (1633) p. 238: We recommend adding a column for Preferred Alternative with RPA flows or including in the column for the Preferred Alternative the following impacts for the 10 species (beginning with the humpback chub): potential major increase, potential increase, no effect, potential major increase, same as no action, presumed extirpated, potential increase, no effect.

1 (1086) Reclamation contends that there are no cumulative impacts since no construction projects are being planned on Colorado River between Lake Mead and Lake Powell, but non-constructionprojects such as recreation affect species like southwestern willow flycatcher and should therefore be considered. Interaction of recreation, cow bird predation and habitat loss should be considered, as well as construction and non-construction projects outside the river stretch between Lakes Mead and Powell. Any project that effects razorback sucker, humpback chub, southwest willow flycatcher, and other critically endangered species should be considered as cumulative actions in FEIS.

3 (0646) Are these really endangered fish?

1 (2260) p. 246, Column 1, ¶ 5: The spawning stimulation historically may have been due to chemical or temperature cues instead of or in addition to flow. You should discuss the possibility of other stimulation mechanisms (e.g., photoperiod)in this paragraph so the reader will know the limitation of this alternative to accomplishing your objective.

1 (2247) p. 236, Column 2, ¶ 4: The first sentence is unclear regarding what is causing the direct impacts. Also, you should make clear whether you attribute sediment losses to flooding or something else. Your sentence on nearshore materials such as sand being needed for creation of larval native fish is not clear.

1 (1893) None of empirical data supporting claim that decline of native and endangered fish populations due to dam's clear, cold releases are presented to support contention or allocate portion of decline so attributable.

1 (1894) Assume pre-dam data on native and endangered fish populations not available since not presented.

8 (0529) Too many unknowns about endangered species to justify blame for their decline on operations at Glen Canyon Dam.

2 (1284) Not yet known how endangered fish are responding to Interim Operating Criteria.

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9 (0377) The preferred alternative may result in further decline of endangered fish in Colorado River.

1 (1575) p. 243, "MLFF," ¶ 1: It is stated that tributaries would be more accessible to endangered fish at minimum releases of 5,000 cfs. Every other section discussing 5,000 cfs minimums had referred to "unlimited access" for endangered fish. Please clarify if access is simply more or if it is unlimited.

1 (2051) p. 242, Column 1, ¶ 2: The scenario of young fish being flushed out of nearshore habitats into more hostile environments is repeated here. Again, this is supposition, not fact.

1 (2248) p. 237, Column 2, ¶ 2: The speculation regarding access being denied is unsubstantiated. For example, if a minimum flow at maximum powerplant capacity occurs at, say 5:00 AM, and this somehow limits access, what happens to access at 5:00 PM when flows peak? Are you saying a fish once denied access at low flow simply gives up and stops trying to gain access? Our experience does not support this conclusion. Do you have any data to support this speculation? We suggest you drop it since, short of waterfalls, this is most likely a non-issue.

1 (2245) p. 235, Column 1, ¶ 4: The statements of limited access to tributaries are not supported by data and are speculative. We suggest you firm up support for these or delete.

1 (2046) pp. 237–238: Restricted tributary access is mentioned several times on these pages as an issue. As far as the Hopi Tribe understands, it is only the No. Action and MPP Alternatives that restrict access. This issue might be clarified, as current reading of the document suggests that restricted access to tributaries is a definite problem that must be overcome. The data indicates that there have been few instances during past dam operations where restricted tributary access has proven to be detrimental to native fish spawning and recruitment.

1 (2258) p. 241, Column 2, ¶ 1: Again, your insistence of an access problem is not justified by data. This conclusion should reflect actual, documented problems.

1 (2021) p. 125, Column 2, ¶ 4: "The cold water released from dam prevents egg and larvae survival of most native fish in the mainstem..." This statement seems to contradict earlier sections of the DEIS, which give the impression that the cold water releases prevented egg and larvae survival of all native fish. Does this statement refer to individuals or species? If it refers to individuals, are there data to support this statement? If it refers to species, which native species are not affected by the cold water?

1 (2251) p. 239, Column 2, ¶ 4: The speculation regarding access being denied is unsubstantiated. The flannelmouth appears to be successfully utilizing tributaries to recruit. This point is not brought out in this paragraph. Razorback prefer flooded, wide bottomlands according to habitat work in upper Colorado River Basin. This supports Minckley's idea that they were probably rare in the Grand Canyon historically. Statement regarding similarities between flannelmouth and razorback may generally be true, but doesn't match present data. Flannelmouth have self-sustaining populations in several canyon tributaries, whereas

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razorback do not. Your food habitats may be similar, but something is obviously different in needs of two species. (CREDA)

1 (2246) p. 235, Column 2, ¶ 1: Your support in using analysis of impacts for chub with razorback is not supported by similarities in their life histories. Among the differences, chub appear to prefer deep canyons, while the razorback prefer wide, flooded bottomlands.

1 (2256) p. 240, Column 2, ¶ 2: Approach in using analysis of impacts for chub with razorback not supported by similarities in life histories. Among differences, chub appear to prefer deep canyons while razorback prefer wide, flooded bottomlands. Mainstem recruitment is not needed if tributaries provide enough recruitment. Thought efforts were underway to establish other tributary spawning populations as a hedge against possibility described. What has happened? Should describe these efforts here. Mainstem habitats are important only to individual fish washed out of warm tributaries. If tributaries provide sufficient habitat for young chub to survive to an age sufficient to deal with mainstem cold water, then mainstem backwater habitats are not important as cold water refuges.

2 (0530) Some non-native fish appear to be predators to the endangered fish.

1 (2048) pp. 239–240: This whole section has the same flaws that we commented on in the response to the Draft Biological Opinion: 1) Razorback suckers and humpback chub are essentially considered as a "single species," even though they have different life cycles and spawning needs. 2) It is inferred, rather than documented, that the range of the humpback chub is continuously constricting.. In addition, the last sentence of paragraph 2, column 1, on page 240 is not likely correct, as the Little Colorado River has been providing just such habitat for at least the last 30 years. This discussion also does not address the potential loss of drift food due to stabilizing the fluctuating flows. (p. 240, col. 2, ¶ 3 would be a good location for this discussion.)

1 (2252) p. 240, Column 1, ¶ 1: Cannot reach conclusion on range contracting if other factors are not known or impacts not measured. Should expand paragraph to discuss whether mainstem spawning or lack thereof has had impact on sustaining populations of these native fish. Have not established why Marble Canyon and upper Grand Canyon reaches are important. Mainstem is not needed to sustain Little Colorado River population since it is self-sustaining and young chub generally stay in Little Colorado River for at least a year before moving out. Mainstem larval habitat may be needed if intent is to achieve a mainstem spawning population. Such a goal may be extremely difficult to achieve. Goals are not clear, so value judgment regarding importance is not supported and should be changed.

1 (1352) pp. 125–126: There is more information available on humpback chub habitat than is used here.

1 (1377) You are trying to save a fish that must have adapted already or else it would be gone by now. The dam has been in place for 30 years.

5 (0934) Population of humpback chub under normal fluctuating flows was relatively stable and self-sustaining.

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1 (1243) Scientific data presented 3: 14: 94 suggests humpback chub population as large today as in 1970's; Little Colorado population at carrying capacity; had highest reproductive rate in 20 years during Interim Operating Criteria; and do well in fluctuating flows (Salt River Project).

6 (0449) Humpback chub numbers are up, but due to good conditions in Lower Colorado River.

1 (1866) Humpback chub is not in immediate danger, having a large, successfully reproducing population, albeit with only a single spawning site.

1 (2321) Limited discussion of how the humpback chub population reached reduced levels and became a federal endangered species.

1 (2179) p. 126, Column 1, ¶ 1: You speculate regarding size as the determining factor in the chub being able to withstand the cold temperature. This ability may actually be tied to size or to something else, like age, life stage, maturation, etc. The size and condition of one-year-old mainstem chub should be compared with same age fish in the Little Colorado River to determine the growth impact of cold temperatures and this analysis put here.

5 (0878) Humpback chub distribution compressed around warm Little Colorado River where spawning is successful.

1 (2253) p. 240, Column 1, ¶ 2: Tributary recruitment (e.g., Little Colorado River) may be sufficient to sustain chub populations without warm nursery areas in mainstem. Language fails to recognize these possibilities and thereby leaps to a conclusion unsubstantiated by present data. Issue of fluctuations being adverse to young chub ignores present situation. Only young chub washed into mainstem from Little Colorado River face these conditions, but chub population in Little Colorado River is self-sustaining, thereby meeting a goal of Recovery Plan. Achieving similar self-sustaining populations in other tributaries should be pursued now as hedge against losses in Little Colorado River. This section should reflect actual problems of entire chub population and not dwell on impacts to a few individuals washed into mainstem.

1 (2254) p. 240, Column 1, ¶ 2: Tributary recruitment (e.g., Little Colorado River) may be sufficient to sustain the chub populations without warm nursery areas in the mainstem. This language fails to recognize these possibilities and thereby leaps to a conclusion unsubstantiated by present data. The issue of fluctuations being adverse to young chub ignores the present situation. Only young chub washed into the mainstem from the Little Colorado River face these conditions, but the chub population in the Little Colorado River is self-sustaining, thereby meeting a goal of the Recovery Plan. Achieving similar self-sustaining populations in other tributaries should be pursued now as a hedge against losses in the Little Colorado River. This section should reflect the actual problems of the entire chub population and not dwell on impacts to a few individuals washed into the mainstem.

7 (0922) No evidence that humpback chub have decreased since dam construction, although range apparently has been reduced.

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1 (1010) p. 240: Please include a discussion about the population structure of the remaining Lower Colorado River population of humpback chub. Keep distinction between contracting range for the population and potential survival for the Little Colorado River population, which appears to have adequate spawn recruit and population structure (p. 240).

1 (2050) p. 240, Column 1, ¶¶ 2–3: Disagree with statements: "Since closure of the dam, the range of the humpback chub in Grand Canyon appears to be contracting" and "The range of the humpback chub will continue to contract..." Once again, data are lacking to support these contentions. Limited records, a wide variety of capture techniques used, and inconsistency in seasonal sampling all compound to make any definitive statements on a contracting distribution and declining density meaningless. Recent information could be interpreted as expansion of the known breeding area in Grand Canyon. The potential for a second breeding population, albeit limited, is important information that should be reported here. (Hopi)

2 (1373) p. 240: Angradi, et al. (1992) did not state that "the range of humpback chub will continue to contract due to death of old individuals in place before the dam." Please delete this attribution.

1 (1050) The Colorado River within the Grand Canyon represents the only stronghold of the humpback chub in the lower basin.

9 (0444) Humpback chub better off than in other places.

89 (0798) EIS should identify temperature of the water as controlling negative factor preventing humpback chub expansion into mainstem of Colorado River—not dam operation.

1 (1632) p. 237: Because some humpback chub have been found in the mainstem upstream of Little Colorado River, the paragraph should be changed to read: "No alternative change in cold water temperatures in the main channel; thus, most eggs would not survive in the Colorado River below Glen Canyon Dam. It is assumed successful spawning would continue to be restricted to tributaries, and..."

1 (1615) p. 126, second column, ¶ 3: Add to the end of paragraph: A form of habitat partitioning is occurring with trout using tributary streams early in the year, winter and early spring when the water is colder, and warmer water species using tributaries later in spring and summer when the water is warmer.

1 (2180) p. 126, Column 1, ¶ 2: Your section on "cues" does not mention photoperiodicity in chub. Has this been investigated? Is there any evidence of the chub responding to temperature or discharge from the Little Colorado River? If so, what about cues for chub above the Little Colorado River that would stimulate them to move to the Little Colorado River at the same time as chub below the Little Colorado River? How could river temperature and discharge be cues for the chub when temperatures are constant and discharge is not seasonal?

1 (1635) p. 242: Change third paragraph, column 1 to read, "Impacts under the NAA also might be applied to the restricted fluctuating flows alternatives. Adverse impacts to the

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humpback chub would be predicted to decrease as conditions become more favorable in mainstem for young and sub-adult native fishes, such as minimizing daily fluctuations.

1 (1326) p. 38: Flows should take into consideration the previous one to three year cohorts of humpback chub, not just the previous one.

1 (2181) p. 126, Column 2, ¶ 2: Trout and other predatory and non-predatory fish are routinely added to the Colorado River, and their introductions are often in direct conflict with the desire to protect endangered native fish from extinction. Your comment on trout not being detrimental to chub may not be complete. Young trout in tributaries may have a big impact on young native fish hatched 3–4 months after them and competing for food and space. Your statement probably refers to adult impacts, but should be revised to reflect possible impacts identified by Larry Riley for tributaries as well as trout foraging on young chub below the Little Colorado River.

1 (2182) p. 127, Column 1, ¶ 2: You state the information on habitat needs is "quite limited," then speculate on the major threats to the razorback as being "habitat alterations." If we do not know what the razorbacks need, then we do not know what changes to those needs will do. This conclusion needs to reflect our lack of data.

1 (2152) p. 106, Column 2, ¶ 2: Regarding razorback suckers, you should comment on the relationship between historic estimates and the supposed decline. Have they declined or have they always been uncommon in this area? You should resolve this obvious question in this section.

1 (2005) p. 106: The only perspective on the razorback sucker that has changed is its recent listing by the FWS (1991). Since 1977, when extensive fishery studies began in the Grand Canyon, biologists collecting from the mainstem river have occasionally encountered large adult razorback suckers (Minckley and Carothers 1979). The reader is led to believe that recent discoveries have shed new light on the razorback's potential for survival in the Grand Canyon. In truth, our knowledge has not changed. This paragraph should be rewritten to accurately reflect the state of scientific knowledge concerning the razorback sucker.

1 (2183) p. 127, Column 1, ¶ 3: Critical habitat is the area considered by the FWS as essential for recovery, not necessarily the area needed by razorback. The DEIS should be revised to reflect this. Also, John Hamill of the FWS Upper Colorado Recovery Program has stated that designation of critical habitat is not needed to recover these species, probably because of the Recovery Implementation Program. Some explanation of the significance of this designation to river management is needed.

1 (2184) p. 127, Column 2, ¶ 1: Razorback may have always been rare in the canyon, according to Minckley (1991). It may have only been used for migration between spawning and rearing areas. Therefore, designating the canyon as critical habitat seems poorly supported and unnecessary for recovery. Some speculation on the future use of canyon habitat by razorback is warranted.

1 (1551) p. 127, second column, last sentence: This sentence should be deleted. Razorback suckers already have access to Grand and Marble Canyons. Without modification of the

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discharge temperature regime by separate action, the referenced 250-mile reach is unsuitable habitat.

8 (0439) Peregrine falcons and bald eagles were rare pre-dam; now 96 pairs of breeding peregrine falcons. They benefit from the dam.

1 (1616) p. 130: Additional information exists on status of southwestern willow flycatcher in Grand Canyon. In 1993, 13 individuals were located in Glen and Grand Canyons; nests were located at two sites, but no southwestern willow flycatcher young fledged. (FWS)

1 (1004) p. 70: Please modify to indicate that bald eagles feed on trout at Nankoweap and other locations where trout can be readily caught. Nankoweap is not the only location that is used by eagles for this purpose (p. 70).

1 (2257) p. 240, Column 2, ¶ 3: The opportunistic, migratory eagle, a transient visitor to the canyon, is not dependent on spawning trout in Nankoweap Creek. The decrease in eagle numbers in 1990–91 from 1989–90 does not mean they were impacted. What evidence exists that trout in Nankoweap Creek are denied the opportunity to spawn by fluctuating flows as implied or that they are prevented from accessing spawning in the creek? In other words, trout spawning in the creek is probably not impacted by present operations, and therefore eagles are not impacted.

1 (1581) p. 254, ¶ 1: There is a statement that bald eagles at Nankoweap may decline under No Action. This does not reflect the favorable status that the bald eagle population in Grand Canyon has achieved following closure of Glen Canyon Dam and operations under a No Action pattern.

1 (2346) p. 129: "The relationships between aquatic productivity, insects, prey species, and peregrine falcons are largely speculative." More speculations!

1 (1336) p. 71: FWS argues that the increase in the numbers of peregrine falcons is due to the discontinuance of pesticides (DDT).

1 (1630) pp. 235–236: Because of information available as discussed in 10: 93 Biological Opinion on the operations of Glen Canyon Dam, Kanab ambersnail should be included in these analyses.

1 (1601) pp. 56–57, Table II-7: The conclusions regarding impacts to the Kanab ambersnail should be modified to coincide with the suggested modified text for Chapters 3 and 4.

1 (1614) p. 129: The first paragraph under Kanab ambersnail states that two populations exist near Kanab, Utah. Unfortunately, one of those populations has been extirpated, leaving only one population in the Kanab area (FWS). Second paragraph also needs update; the Kanab ambersnail in the Grand Canyon is associated with monkey flower, not cattails. Also know that individuals have been found below 30,000 cfs mark, and habitat may be affected by uncontrolled or controlled floods above 30,000 cfs. FWS, GCES, and NPS are currently reviewing proposals to evaluate effect of habitat: beach building flows on Kanab ambersnail and its habitat.

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1 (1370) p. 235: The otter is considered extirpated here while in Chapter III, p. 130, it is considered extinct; clarify.

1 (1617) p. 130: FWS has been notified by NPS that an unconfirmed sighting was made of a river otter in the Grand Canyon in 1993.

1 (2018) pp. 124–130: Reference to the spotted bat should be included in this section.

1 (1574) pp. 242–243: Fish prey for belted kingfishers are smaller than trout. The supposed restrictions to tributary access from low flows may affect smaller fish less, thus "impact" kingfishers less. In any case, the impact of tributary access seems to be a matter of subtle degree and not significant difference.

1 (1354) p. 130: Osprey are uncommon migrants in Glen and Grand Canyons.

c. Protection of Endangered Species

1 (2019) p. 125: The Hopi Tribe requests to be listed with the other identified groups that will be involved in the development of the conservation measures.

1 (2087) p. 29: The discussion of the proposed flows for endangered fish research does not adequately define this Program, nor is the impetus for including this proposal identified, i.e., the RPA in the Draft Biological Opinion. The Navajo Nation has submitted substantial comments on the Draft Biological Opinion in a letter to the Upper Basin Regional Director. Those comments are germane to Attachment 4, FWS Coordination, and are herein incorporated by reference.

1 (0958) Cooperators should be reconvened to identify solutions to MLFFA endangered fish research problems that can be incorporated in final EIS and ROD.

3 (0923) No models exist to help Reclamation determine incremental relationships between flow, temperature, and river conditions favorable to endangered fish exclusive of other variables.

16 (0839) Support endangered fish research.

7 (0779) More research needed on endangered fish.

1 (1434) Special study flows seem justified, although it could be argued that they should have been done during ten years of GCES.

137 (0181) More research is needed on endangered fish to determine whether even limited fluctuations in daily water flows from the dam are acceptable.

65 (0226) Ensure that studies of endangered species are based on solid scientific research programs made credible through broad peer review.

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1 (1875) Summary p. 23: Additional basic research for a decade adds an element of uncertainty to dam operations. Let qualified scientists evaluate which flow regimes should be tested, based on clearly defined scientific hypotheses. Truly scientifically based flow experiments may require a variety of fluctuating and constant flows for different durations.

2 (0427) Should study FWS recommended SASFA for endangered fish for several years to see if fish benefit. If not, then MLFFA can be implemented.

6 (0356) Steady flows of endangered fish studies mimic SASFA flows.

1 (0712) Test flows did not follow seasonally adjusted steady flow pattern for even one year; endorse 5 year study suggested by FWS.

11 (0386) Research studies on native fish are important but should proceed under fluctuating flow regime.

89 (0796) Endangered species research should be submitted to Adaptive Management Program review before being done.

24 (0358) The endangered fish: native fish research should: needs to be part of the Adaptive Management Program and long-term monitoring and research.

1 (0650) Endangered fish research should move slowly after full discussion by all affected parties.

3 (0927) Five years of study (which may take 10 or more) are of questionable validity for long-lived species like humpback chub.

2 (0931) Endangered fish research sounds reasonable, but should be compared with the system's capacity to handle more humpback chub.

1 (1705) Extremely bad science to experiment with last habitat of any endangered species; establish another viable population before authorizing experiments.

1 (1066) Future study methods for returning endangered species should include strategies for managing the non-native species.

46 (0188) Ensure that before flows are further modified for endangered species studies, the management of exotic, predatory species are a central element of the endangered species management plan.

4 (0860) Have reservations about need for continuing studies for humpback chub and razorback sucker fish. Neither are a game fish or primary forage fish.

1 (1266) Opportunity to test flow regime during 10 years after ROD problematic because of requirement for system equalization.

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3 (0921) Endangered fish research attempts to achieve habitat changes through flow modifications, despite recognition that conditions during period of study not conducive to successful spawning in mainstem.

92 (0795) Endangered species research flows are experiments and should be labeled as such.

1 (2261) p. 246, Column 2, ¶ 3: Recommendations represent gamble. Know there has been dramatic increase in diversity and quantity of plants and animals from pre-dam levels. FWS has not said new diversity and quantity should be eliminated; rather, attempting to achieve protection and further enhancement by mimicking pre-dam flows. Don't understand viewpoint that continuing present flow condition (new quantity and diversity of plants and animals) is undesirable, whereas gambling on a new, untested flow pattern to maintain it viewed as desirable. Lack of data for proposed flow scenario exists. Studies under Interim Operating Criteria emulate Preferred Alternative gathered data to document effects. Paragraph should reflect present conditions (demonstrate Little Colorado River population does not need mainstem nursery areas to sustain numbers). If goal is to establish a mainstem spawning population, then mainstem nursery is needed. Spell out need; reflect present program. (CREDA)

2 (1180) Preferred Alternative suggestion that years when annual releases are at or near 8.23 million acre feet are likely to occur one year in two is not supported by data, which suggest less than one in three affecting length of time to complete seasonally adjusted steady flow research (Marcus).

1 (2262) p. 247, Column 2, ¶ 2: The Service desires to "facilitate natural ecosystem processes" by mimicking the natural hydrograph is a questionable goal given two significant factors: 1) the existence of the dam; and 2) the presence of both desirable and undesirable biological conditions. The dam has created vastly different water quantity and quality conditions. These changes make the return to natural ecosystem processes impossible. Also, the dam has allowed proliferation of aquatic and riparian vegetation, creating desirable habitat for waterfowl and the endangered southwestern willow flycatcher and other riparian species. Emulating a natural, pre-dam hydrograph with its scouring, spring-time floods would jeopardize continued existence of this habitat.

1 (1636) p. 244: The endangered fish research flows (RPA) would be similar to SASFA for only half of the year. Operations in the remainder of the year would be similar to ILFFA with some changes due to availability of water. We recommend that impacts be addressed in paragraphs 2 and 3 under MLFFA for those years with RPA flows. (FWS)

5 (0682) FWS has ignored science in endangered species research proposal. It is irresponsible.

3 (0506) Is FWS decision an attempt to create a lab experience for naturalists and scientists at expense of public?

1 (2089) p. 29, Paragraph 7: What issues or management objectives the "research hypotheses and specific flows or experiments" are intended to address is not indicated. As presented, program would constitute worst kind of blank check of undirected research, which does not result in resolution of management issues but only confuses decision making, expending large

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sums and perpetuating research programs within river corridor. Statement that proposed endangered fish research program would require as many as 5 low release years with completion in 10 years is misleading. Based on past experience in Grand Canyon, including GCES, it is likely that in order to reach definitive conclusions, the number of years of research will be significantly greater than 5 years. DEIS is misleading the public with regard to potential length and impact of such a research program. If these issues are not clearly and completely addressed in the FEIS, then recirculation of a supplemental DEIS may be necessary.

19 (0333) Endangered fish studies not adequately defined and described in preferred alternative.

102 (0357) The endangered fish research program not fully developed; impacts not identified to power and other resources.

2 (0491) Local power consumers, recreationists, and others must be considered in any decision to implement changes called for in research flow studies.

1 (0954) Without risk analysis and consensus about need for firewalls and other alternatives in this research, Hualapai, Havasupai, Hopi, and Navajo tribal resources are vulnerable.

6 (0928) Five years of study (which may take 10 or more) will be burdensome: inefficient to other resource users, especially to power.

9 (0813) If steady flow research is not removed from EIS, all impacts should be identified for public and made available for review and comment before finalized.

3 (0819) Endangered fish research (as part of Adaptive Management Program) should only be done after careful design so that potential impacts on all resources may be evaluated.

12 (0844) No scientific data has been provided to support suggestion that steady flows create environment more suitable to native fish or that they should be studied in steady flow environment, or that it will remove them from jeopardy.

1 (1537) p. 69, right column, ¶ 4: Statement regarding "proper conditions" is the crux of the Service's Preferred Alternative (SASFA), and is basis for inserting research flows into NEPA Preferred Alternative, creating Section 7 Alternative. If FWS or Reclamation know what proper conditions are, should be described, together with references to supporting research. Suggest deleting reference to proper conditions and insertion of word "may" in phrases "near shore areas may protect young fish" and "backwaters may have higher water temperatures."

1 (2027) p. 202, Column 1, ¶ 2, last sentence: In this version of the boiler-plated paragraph on the endangered fish research flows, these flows are reported to have the same impacts on fish as the Seasonally Adjusted Steady Flow Alternative. How can this be? The SASFA calls for monthly steady flows on a year-round basis. In contrast, the endangered fish research flows would be followed each fall by fluctuating flows similar to those of the Low Fluctuating Flow Alternative. Months of steady flows would be followed by months of fluctuating flows, possibly for several consecutive years. How can this combination have the

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same consequences to fish habitats and fish reproduction and survival as monthly steady flows year-round? It is the position of the Hopi Tribe that they cannot.

1 (2111) p. 202, Paragraph 2: In this version of the endangered fish research flow boiler-plate, endangered fish research flows are indicated to have impacts to fish that are equivalent to the SASFA. SASFA consists of adjusted monthly steady flows year-round while the endangered fish research flows would be preceded each winter and followed each fall by fluctuating flows. Months of steady flows would be followed by months of fluctuating flows, possibly for several consecutive years. This combination of flow patterns cannot have the same consequences for aquatic habitats and fish reproduction and survival as monthly steady flows year-round. This is a critical issue that must be addressed for the final document to be in compliance.

7 (0354) Steady flows of endangered fish studies may harm other resources.

7 (0348) Steady flows of endangered fish studies will further reduce power generation.

4 (0355) Steady flows of endangered fish studies may have severe economic impact because of further loss of generating power.

1 (1265) Research flows could seriously impact viability of power marketing from Colorado River Storage Project system, availability of power res. for growth in member states, and jeopardize repayment of Colorado River Storage Project projects.

2 (0388) DEIS fails to consider the impact of steady flow research on the Exchange Agreement between SRP and Reclamation.

1 (2090) p. 30, Paragraph 1: The statement in this paragraph regarding actions to correct adverse impacts to endangered species belies the very significant issue of potential impacts to native fishes by non-native fishes under steady flows. The final EIS must specify a well conceived program to monitor potential impacts to native fishes under any steady flow program in order for the public to have confidence that this significant issue is fully appreciated and addressed. The reference to compliance with the Endangered Species Act is the only reference, albeit offhand, to the biological opinion and its role in the revision of the Preferred Alternative.

2 (0924) Impact of endangered fish research flows on reduced downstream productivity through Cladophora drift seems to go against studies by Liebfried and Blinn (1988), and Angradi, et al. (1992).

12 (0351) Steady flows of endangered fish studies may change ecosystem of project area to detriment of native fish.

1 (1319) p. 29: Repercussions of research flows for endangered fish may not be very clear to the general public.

3 (0932) Endangered fish research sounds reasonable, but should be compared with the potential for a catastrophic event damaging the present population.

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1 (2047) p. 239, Column 1, ¶ 3: In describing the effects of the fish research flows on the endangered fish, it appears that their effect can not be determined. This is not a very defendable position when the flows are being undertaken ostensibly as a measure to improve the fish habitat.

2 (1283) Possible adverse impacts to endangered fish of research flows are not known. Absent significant benefits, increased risk is not justified.

18 (0349) Steady flows of endangered fish studies may harm endangered fish.

2 (0403) Would like to be assured that flow needed to conduct research on endangered fish is guaranteed to recover population of humpback chub.

3 (0930) No evidence exists that research flow proposal would affect ability of fish to access tributaries for spawning. Untested hypothesis continues to be suggested.

3 (0929) Changes in operation for endangered fish research may be disproportionately advantageous to non-natives over humpback chub and decrease chances for humpback chub to successfully compete for habitat.

2 (1264) Proposed experimental flows will not remove the jeopardy impacts of the Preferred Alternative.

3 (0926) Steady flows of endangered fish research would change conditions that resulted in increase in peregrine falcon numbers.

4 (0745) Support endangered fish research, but risk of non-native predators must be considered and identified in research plan.

3 (0933) Endangered fish research sounds reasonable, but should be compared to the potential for the efforts to yield damaging increases in non-native predatory and competing fish.

25 (0350) Steady flows of endangered fish studies may give non-native fish an opportunity to multiply: may benefit non-native fish.

1 (0955) We will support research if it has enforceable guarantees that it will not be allowed to intrude on our responsibility to protect tribal resources as part of ROD.

2 (1593) p. 29: Although contents of this section are correct, we question whether it clearly represents the magnitude of changes. In reality, the Preferred Alternative as described on p. 27–29 will not be implemented in low water years in the near future, and in fact may be highly modified depending on the results of the research program.

16 (0347) The endangered fish studies are the only major component of the preferred alternative not reviewed by cooperating agencies. Violates intent of Grand Canyon Protection Act.

6 (0454) FWS provisions in Preferred Alternative do not help to reconcile the divergent needs of all involved; does not meet balance of resources requirement.

Frequency (I.D. Number) Comment

1 (1527) p. 29, Second column, "Endangered Fish Research": Should be noted that this component of Preferred Alternative was not developed through EIS process as were other components and other alternatives. Inclusion of this component is not result of cooperating agency consensus or adaptive management process. Intended research is not objectionable, but method used to insert it into a research-derived, consensus-based alternative is troubling. Other process developments that reflected the concept and spirit of adaptive management and had support of cooperating agencies were not implemented.

19 (0459) Eleventh hour run for critical habitat, endangered species, and fish protection not part of original process: compromises process.

1 (0976) Have serious concerns over the way low steady summer flows for fish research became part of the preferred alternative.

14 (0474) Disagree with FWS position, which has a singular purpose and non-cooperative spirit.

2 (0920) Endangered fish research only appears in Preferred Alternative so any other alternative chosen would not have the addendum.

1 (2088) p. 29, Paragraph 6: FWS representatives have frequently made point that because these steady summer flows have never been available since construction of dam, native fishes' response to them is not known. True, but lack of understanding regarding impacts of a flow regime is far from position taken by FWS that steady flow regime's essential for maintenance of native fish populations. FWS has not demonstrated this. The fact that native fishes have persisted in a post-dam environment without flows is evidence they are not essential for survival. No clear rationale for inclusion in Preferred Alternative is presented. Inclusion is unwarranted and was not a consensus opinion. Statement that endangered fish research flows would be "coordinated with the long-term monitoring and research under the Adaptive Management Program" is ambiguous and obscures apparent intention of Reclamation to conduct this proposed program in conjunction with FWS, in spite of fact that Navajo Nation and other agencies and tribes have clear jurisdiction with respect to habitat and management of endangered fishes and are being excluded. (Navajo)

2 (1594) p. 29: Reason for integrating the endangered research flows with this alternative should be explained, as should a reference to Attachment 4, which includes the RPA. The second to the last sentence in paragraph 1 could read: "Therefore endangered fish research flows, a required element of the biological opinion, would be integrated into this alternative during at least the initial years of implementing the Preferred Alternative."

18 (0344) Endangered fish studies should not be part of the Preferred Alternative, the RPA, or FEIS.

1 (1267) Attempting to force fit flows into FEIS: ROD process appears unjustified and ill-fated.

7 (0820) Including endangered fish research in Preferred Alternative will limit flexibility needed to modify efforts in response to findings. (No change for 10 yrs or more, delays for NEPA compliance if significant problems, etc.).

Frequency (I.D. Number) Comment

1 (1706) The contemplated intervention could violate intent of Endangered Species Act since possibility exists of further endangering the species.

7 (0634) Placing Endangered Fish Research in Preferred Alternative ignores intent of Grand Canyon Protection Act by setting up research to be done after ROD without Grand Canyon Protection Act required consultation.

1 (1685) If endangered species research flows show that changes in operating criteria were needed and SASFA are more environmentally favorable, we assume some sort of supplemental NEPA compliance documentation would be prepared to address impacts with these changes.

127 (0186) Protect endangered species and: or their habitat.

2 (0688) If you protect endangered species (humpback chub), you protect the canyon.

2 (0185) I am very much encouraged that there is finally a proposal that gives high priority to the recovery of the humpback chub, razorback sucker, peregrine falcon, southwest willow flycatcher, and the other endangered and threatened species in the Grand Canyon.

11 (0187) Stabilization of the fluctuations is crucial for the endangered species.

5 (0180) Less fluctuations would go a long way to enhancing endangered flora and fauna.

2 (0182) LFF and SF Alternatives provide best chance for endangered species.

1 (1228) SASFA best alternative to operate the dam in a manner that does not adversely impact critical habitat until sediment augmentation and selective withdrawal structures make change in hydrologic regime possible.

21 (0602) SASFA offers best protection of endangered and other special status species.

1 (0704) Talk of constructing barriers around backwaters for endangered fish is disturbing.

1 (1832) If indicator species are to be used to gauge ecosystem health, name them and the population dynamics that would show stability in the system.

1 (1874) Summary p. 12: The humpback chub is not the only endangered species in this system. Further consideration of each aquatic and terrestrial: riparian endangered species are needed as is evaluation of complex interactions between resources and processes.

1 (1383) It is time to use some sense and ignore these trash fish.

1 (1964) It is difficult to assess properly the economic benefits associated with the protection of endangered species; they are often overlooked in the economic picture.

1 (0821) If Preferred Alternative is modified to resemble LFFA, we would then support SASFA because of benefits for endangered species.

Frequency (I.D. Number) Comment

1 (1226) While changing operations at Glen Canyon Dam has potential to restore habitat of endangered fish, the Preferred Alternative will not aid fish recovery because of sediment budget and water temperature.

1 (1397) A record of decision should not be issued until FWS is satisfied that the RAPA exists within the Preferred Alternative.

2 (1103) Monitor effects of Preferred Alternative on endangered species. After a few years if FWS has scientific evidence that flows are harming species, then make adjustments based on science.

1 (1102) If endangered species are really not proven to be in danger under the Preferred Alternative, it is obligation of US Department of Interior to maximize the power generation capability of Glen Canyon Dam.

2 (1282) Risk assessment should be done on response to Preferred Alternative by native and non-native species. If shows non-natives respond more favorably than natives, then flows equal detriment to endangered fish.

1 (0558) What has been spent so far amounts to $100,000 a piece for those endangered fish.

2 (1247) Should not transfer the burden of recovering humpback chub and other endangered species to the Upper Basin.

1 (1888) If government uses these Compact waters for fish, Colorado's opportunity cost will be $10–20 billion—not few million indicated in Nov 1993 FWS Economic Analysis.

1 (1767) Has Reclamation reviewed mainstem ADGF researchers' data showing large numbers of young-of-year humpback chub, and other native fish, inhabit backwaters?

1 (0163) Is the reintroduction of Colorado Squaw Fish being considered?

1 (0956) Astonishing that FWS is unwilling to consult with Tribes to determine least invasive action that might conclude in strong fisheries.

5 (1277) Since most factors limiting endangered fish are not related to flows, all alternatives have very similar effects on endangered fish.

1 (1164) DEIS confusing about how best to protect endangered fish due to unavoidable lack of data on how fish would react to different flow regimes and what spawning habits are.

2 (1279) Scientific evidence does not show that new Preferred Alternative provides better conditions for endangered fish than the consensus alternative of Cooperating Agencies.

3 (1281) The Preferred Alternative does not provide enough benefit to endangered fish in exchange for the impact it has on other resources.

Frequency (I.D. Number) Comment

1 (1053) Preferred Alternative will not benefit native fishes and, more specifically, the endangered humpback chub and razorback sucker.

8 (0179) Steady flows are needed to protect the endangered humpback chub and razorback sucker.

65 (0715) SASFA best for endangered fish.

9 (0827) SASFA best because of potential for major increase in humpback chub and flannel mouth sucker.

1 (0703) Biologists say either the "RPA of FWS" or the SASFA is best for endangered fish. Politics and economics say otherwise.

2 (1285) Assumption that pre-dam flows are beneficial to endangered fish doesn't recognize permanent post-dam condition: clear cold water and reduced sediment load. Flows favorable pre-dam may not be now.

1 (0364) 25,000: 4,000 flow changes would reverse reduction in sloughing enhancing food supply for endangered species.

1 (1886) Basic concept of limiting peak snow melt flows for endangered fish would seriously limit potential of Upper Basin states to store and use their respective Colorado River Compact water.

1 (1889) Because of inadequate fish loss: recovery data, entire original habitat of Colorado River endangered fish is being designated as critical habitat.

1 (1890) Some Colorado River tributaries are much more suitable for endangered fish recovery than others.

4 (0475) Consider other habitats that may be better suited to endangered fish as a possible solution to this issue.

14 (0290) Warmer water is critical for survival of native and endangered species: cold water harms.

1 (1227) Sediment augmentation, selective withdrawal structures to warm water, and habitat maintenance flows are required for Reclamation to operate Glen Canyon Dam for endangered fish recovery.

1 (2345) p. 126: The many holes in knowledge of humpback chub biology are obvious, and point out the need for continuing humpback chub research in the long-term monitoring and research and Adaptive Management Program.

1 (2020) p. 125, Column 2, ¶ 3, second sentence: Beginning "Recent mainstem..." This statement implies that this concentration of humpback chub is only a recent phenomenon. Ever since fisheries studies began in the Grand Canyon in the late 1970's the chub has been

Frequency (I.D. Number) Comment

clustered in this area (Carothers and Minckley 1981). Suggest that this sentence be revised to accurately reflect the current state of knowledge.

1 (2178) p. 125, Column 1, ¶ 1: This paragraph describes the "Grand Canyon" population of chub. You should also describe the Little Colorado River population of chub that remains year-round in the Little Colorado River. You should speculate on the reasons for the tremendous differences in gear efficiencies and what this may mean regarding habitat preferences and estimates of populations.

1 (1548) p. 125: True humpback chub has only experienced daily fluctuations since closure of dam. However, humpback chub was declining before dam was built and listed in 1967. Efforts should continue to attempt and improve capacity of species to survive potential cataclysmic events to Little Colorado River population (through establishing of second self-sustaining population in another tributary or in mainstream), but urgency to test steady flows, which result in impacts to other resources including hydropower, would make sense only upon completion of feasibility studies for temperature warming, sediment augmentation and controlling non-native fish species.

2 (1721) Because humpback chub breeding habitat in Little Colorado River is successful, it may be more realistic option to give greater protection to Little Colorado River than to remake Colorado River solely for benefit of this fish.

1 (2250) p. 239, Column 1, ¶ 2: You suggest the operational alternative selected will determine the potential for chub. This is debatable since temperature is not affected by the operational alternatives being considered. A new structure (multi-level intake) may help a bit, but probably not enough to significantly increase survival of eggs or larvae. Some speculation on this point should be provided.

2 (1278) Humpback chub recovery depends on measures other than flow modification, including measures related to water temperature, including turbidity, developing new tributary habitat, and reducing competition and predation by non-native species.

1 (1773) Reclamation seems intent on waiting for selective withdrawal to affect any positive changes for humpback chub, either in mainstem or tributaries; policy is essentially a monumental stall tactic.

1 (1051) Best way to enhance population of humpback chub and insure continued existence is to mimic the historical hydrograph as proposed by Biological Opinion issued by FWS along with sediment enhancement.

1 (1288) Recovery of humpback chub using steady flows is speculative. Experimenting with habitat change carries significant risk and few benefits.

1 (1754) Is Reclamation legally bound to honor Environmental Commitments to establish a new population of humpback chub?

1 (2327) p. 38: The details of establishing a second humpback chub population must be in the FEIS.

Frequency (I.D. Number) Comment

1 (1926) Plans for restoration of viable populations of humpback chub in the mainstem of the Colorado River must be part of the FEIS, in addition to preservation of the Little Colorado River population and establishment of a second population in a Grand Canyon tributary.

8 (0914) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because there is a greater chance of success.

3 (0915) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because controlling native and non-native interactions will be easier.

5 (0916) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because a wider variety of temperature and chemical conditions are available.

2 (0917) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because success will be easier to measure.

2 (0918) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because expanded use of lower canyon mainstem habitats could be achieved.

4 (0919) Establishment of new population of humpback chub in one or more tributaries has merit and should be supported because it would avoid inefficient use of water releases at the dam.

1 (1755) Reintroduction of new population of humpback chub should not be delayed because of selective withdrawal, which will only affect mainstem waters and not tributary waters.

1 (1165) Support continued research through Adaptive Management Program of what flow regime would best support second population of humpback chub either in mainstem or suitable tributary.

2 (0847) New population of humpback chub should be kept within boundaries of NPS lands to avoid possible conflicts with public lands.

5 (0590) Establishment of second habitat for endangered fish below Glen Canyon Dam seems unrealistic.

1 (1652) Summary p. 12: Last sentence in paragraph 2 should read: "Therefore, at least one or more additional populations or spawning aggregations in the mainstem or tributaries below Glen Canyon Dam should be established." Similarly, the last sentence in paragraph 3 should include "in the mainstem or" after the phrase "humpback chub is established in."

1 (1497) Summary p. 12, & main doc. pp. 37–38, ¶¶ 2–3: Seems that if any of other tributaries were able to meet requirements of species, fish would already be using them. One of supporting reasons offered for steady flows is to enhance feasibility of drift to allow fish to establish in other tributaries. Why not capture and release some adult fish to those

Frequency (I.D. Number) Comment

tributaries and monitor them? Establishing a new population in another tributary may not be realistic, but encourage every effort to do so.

1 (0992) p. 38: Discussion under the section "New Population of Humpback Chub" seems to reflect the interests of FWS rather than ecological reality of the Colorado River System.

1 (1993) p. 38: There is no discussion of attempting to establish a breeding population of humpback chub in the mainstem, only in the tributaries. This being the case, why even study selective withdrawal?

1 (1691) p. 38: When did Reclamation consult with the Havasupai Tribe regarding establishing a new fish population in one of the tributaries of Grand Canyon within the boundaries of their Reservation? Does the Tribe want to be referred to as a land management agency? Please clarify these points.

1 (1597) p. 38: Advice from researchers and the element in the RPA include the mainstem as well as tributaries as possible locations of a second spawning aggregation or population; last sentence should be changed to read: "Therefore, at least one or more additional population or spawning aggregation in the mainstem or tributaries below Glen Canyon Dam should be established."

1 (0993) p. 38: Suggest that new population of humpback chub below Glen Canyon Dam would first be evaluated on basis of: a) natural distribution, b) appropriateness of any ecosystem manipulation being called for, and c) policy implications for NPS, Reclamation, and FWS.

1 (1668) p. 52: Statement near end of the page about establishment of second population of humpback chub in tributaries or mainstem considered a common element is inaccurate. The descriptions of common elements only consider tributary sites. Avoidance of mainstem consideration for augmentation may be a technical restriction of the EIS process, but is most desirable from a biological standpoint. A section explaining why mainstem augmentation is not considered should be added for clarification.

1 (1535) p. 53: The Little Colorado River provides conditions that enable humpback chub to maintain "viable" population. Assuming FWS's objective is to establish two self-sustaining populations in Grand Canyon (objective is not included in the published Humpback Chub Recovery Plan for Colorado River Basin), then can we assume that a second population in another tributary would meet the objective? Strongly encourage FWS and Reclamation to exhaust all efforts to accomplish that objective before implementing steady flows.

1 (2249) p. 237, Column 2, ¶ 4: We have not seen it established that the Little Colorado River must supply the entire mainstem with chub. The Little Colorado River has a self-sustaining population, and the Recovery Plan suggests establishing at least another population, which could be in other tributaries to the mainstem. This section should be revised to reflect these possibilities.

1 (1353) p. 127: There is habitat information on razorback sucker (data lacking for juvenile life stage). Should be explained how critical habitat designated.

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1 (1613) p. 127, first column, last paragraph: Change to read: "With listing of the razorback sucker, the process of determining critical habitat for that species and the other "big river" endangered fish species began. Critical habitat is defined by Endangered Species Act as habitat containing the physical and biological features essential to the conservation of a listed species and may include occupied or unoccupied habitat. A proposed rule was published January 1993 and final rule 3: 21: 94. Critical habitat for humpback chub includes lower 8 miles of Little Colorado River and Colorado River from RM 34 to RM 208. For razorback sucker, critical habitat includes the Colorado River from confluence with Paria River (RM 0) to and including Lake Mead.

1 (1372) p. 238, Table IV-12: Would there really be a potential minor increase in razorback suckers under MLFFA and ILFFA?. Will water levels be high enough to inundate lowlands utilized during spawning? Without this, species could not increase.

3 (0935) Development of action plan to insure continuing existence of handful of razorback suckers is unrealistic since Grand Canyon is antithesis of ideal habitat.

3 (0936) Development of action plan to insure continuing existence of handful of razorback suckers is unrealistic since historically Colorado river was probably only migration route.

2 (0937) Development of action plan to insure continuing existence of handful of razorback suckers is unrealistic since it would divert resources from more productive efforts elsewhere.

3 (0938) Development of action plan to insure continuing existence of handful of razorback suckers is unrealistic since it may conflict with changes needed to benefit other resources.

1 (1286) Development of action plan to insure continuing existence of handful of razorback sucker is unrealistic, since it is not necessary for their continued survival.

2 (1276) New Preferred Alternative is designed to postpone a jeopardy opinion with regard to endangered fish.

96 (0797) None of the alternatives will remove the endangered fish: humpback chub from jeopardy or the jeopardy opinion.

1 (2052) p. 244: Believe FWS presented no hard evidence in Draft Biological Opinion to support jeopardy ruling against original MLFFA Case largely rested on belief that any physical condition perceived as more "natural" is automatically better for endangered fish, no matter how overall ecosystem changed. Ignored or diminished role of non-natives in the decline and threat to native fishery. Despite jeopardy ruling, effects of low fluctuating flows on the endangered fish species is simply not known. Such flows may not jeopardize the humpback chub; no one knows what is happening with the razorback sucker in Grand Canyon.. Currently less is known about RPA effects than is known about those of low fluctuating flows. Compared to the RPA, the original MLFF Alternative is a more conservative management strategy with a lower probability of either helping or harming the endangered fish. (Hopi)

Frequency (I.D. Number) Comment

1 (1576) p. 244: Research has not supported supposition that continuation of Interim Operating Criteria or implementation of MLFFA would jeopardize the continued existence of the Grand Canyon humpback chub population mostly dependent upon conditions affecting the Little Colorado River, or sediment and temperature limitations from dam existence, not its operation, relieving jeopardy predicated on modified discharge temperature regime requiring structural modification of the dam. Structural alternatives are beyond the present operations-based scope of this EIS and, if considered, should be a feature that could be added to any alternative. Without a structural alternative, none of the proposed alternatives can create or relieve jeopardy.

3 (0338) It's possible that unless and until the temperature of the water is changed the Hump-back Chub will be in jeopardy.

1 (1772) Reclamation refuses to confront the concept that flows, temperature and turbidity, probably all need to be modified to remove the humpback chub from jeopardy.

1 (1039) FEIS should describe how decisions regarding research and adaptive management of endangered species and continuation or successful completion of measures required by FWS to remove the jeopardy opinion would be made and by whom.

1 (1382) Non-native trout attract endangered eagles, peregrine falcons, etc. If we alter flows, which endangered species do we save?

1 (1867) Conflicts between management of Southwest willow flycatcher with the humpback chub are likely to occur because low flows that may benefit humpback chub may strongly alter nesting habitat of southwest willow fly catcher.

1 (1085) Critical habitat has been established for several fish in the project area since publication of DEIS and southwestern willow flycatcher is almost certain to be listed as endangered with critical habitat within project area. FEIS must consider these in detail, including importance of sand bars and backwaters to southwestern willow flycatcher.

1 (2317) DEIS ignores any discussion of the dam's effects on the possible recovery of the southwestern river otter.

d. Impact of Endangered Species Issues on the Process

3 (0291) Take a balanced approach to endangered species in deciding on flow modifications.

8 (0739) Not a good idea to let endangered species program drive management of the Colorado River.

49 (0189) The endangered species research program should not be so open-ended that one resource drives the process for an entire ecosystem.

2 (1061) Concerned that the endangered species has begun to overshadow the original intent of finding consensus among the many varied users and resources in the canyon. There is

Frequency (I.D. Number) Comment

danger of this becoming native fish issue and only objective of EIS, rather than native fish being one part of overall solution.

2 (1280) Emphasis behind development of alternatives was on sediment. Since sediment identified as key resource, what benefits sediment benefits other resources. Shift to endangered fish emphasis may render some assumptions of alternatives obsolete.

3 (0343) If operation of the dam is not jeopardizing endangered species, then strategies in draft biological opinion constitute potential recovery plan and not decision making force in DEIS.

135 (0184) Endangered Species should get high: highest priority with emphasis given to native species.

1 (0600) Protection of species must supersede demands for irrigation.

8. Cultural Resources - 143 statements dealt with this subject.

a. Site Identification and Importance

7 (0607) Condition of cultural resources is important to recreation experience.

20 (0606) Cultural resources are important: need protection.

1 (0787) Cultural resource sites include archeological sites, significant land forms, geographic landscapes, sacred sites, burial sites, and plant gathering areas.

1 (2105) p. 131, Paragraph 1: The statement that only historic archaeological sites represent "use" by Navajos is inaccurate. Several "prehistoric" sites have been identified as significant by Navajo people and: or contain Navajo ceramics or other evidence of Navajo use. Further, the distinction between "prehistoric" and "historic" as used by archaeologists is generally not meaningful to knowledgeable Navajos, and probably not meaningful to representatives of other tribes as well. The prehistoric and historic identifiers placed in parentheses after each tribal group do not add to the content or meaning of the paragraph, and we suggest eliminating the parenthetical labels altogether.

1 (1978) Summary pp. 50–51: It is the position of the Hopi Tribe that since there are Hopi ancestral graves in archaeological sites in the Grand Canyon, these graves need to be explicitly recognized as an affected resource. Perhaps the following sentence could be inserted at line 23, page 51. "The graves of Hopi and Zuni ancestors buried in archaeological sites are also considered sacred by those tribes."

1 (2055) pp. 248–259: Similarly, the Hopi Tribe also feels that treatment of the Traditional Cultural Properties category is difficult to follow and at times misleading. The summaries of the data in Tables IV-14 and IV-15 only address a portion of the classes of properties that are considered Traditional Cultural Properties and then other types of Traditional Cultural Properties are addressed inconsistently within the text

Frequency (I.D. Number) Comment

2 (2115) p. 249, Paragraph 1: The term "... tangible historic sites..." in the first sentence is confusing. Would the confluence of the Little Colorado and Colorado Rivers, for example, be considered a "historic site"? We recommend using the term "places" instead of "historic sites." Similarly, in category 1, under traditional cultural properties, why are prayer offering locations denoted as sacred separately from the other places? All those places are sacred sites. Again, we recommend deleting the parenthetical identifier. In the next column on the same page, first full paragraph beginning "With the closure..." and second paragraph in the sentence beginning "Because...," would it be possible to include a small line drawing showing how the erosional process affecting archaeological sites works? The discussion alone makes the impacts difficult to visualize.

1 (2058) p. 249, Column 1, ¶ 2: Traditional Cultural Properties should not be divided into two arbitrary categories. Based on Bulletin 38, all Traditional Cultural Properties must be tangible sites. Whether traditional cultural property is a shrine,... it must have a location. We recommend that the categorization be done as follows: "Traditional Cultural Properties can include such things as: plant gathering areas, landforms, springs, prayer offering locations (shrines), archaeological sites, ancestral burials, mineral deposits, and other resource collection sites. Many resources are extremely important, or even vital, for continuation of cultural practices, but may be obtained in many locations, none of which are specifically prescribed. These Traditional Resources ... are not eligible for the National Register. Their importance to Native Americans should not be considered lessened because of ... historic preservation law....still critical..." (Hopi)

1 (2062) p. 250: The Traditional Cultural Properties portion of this table needs to be revised. Utilizing numbers as an indicator is confusing as no numbers are presented in either the table or in the text. In addition, suggest that current grouping of Traditional Cultural Properties into current categories does not reflect legislative requirements. Better subdivision would group all of the Register eligible Traditional Cultural Properties on a single line. Then a qualitative assessment of the impacts of the different alternatives should be used as complete counts of Traditional Cultural Properties are not known. Assessment could be made on the basis of known responses to archaeological sites as a predictor for those Traditional Cultural Properties that are "physical" sites (e.g., shrines, archaeological sites, erodible deposits, etc.). Added to this would be effects of alternatives on Traditional Cultural Properties that are biological in nature; these will likely follow the same pattern of impact: enhancement as the riparian vegetation.

8 (0630) DEIS does not explain how many of 157 cultural sites are eligible for listing on national register.

1 (2185) p. 130, Column 2, ¶ 3: A site may be deemed in need of protection simply because an archaeologist defines it as a site needing protection. Is there no avenue for public input to this process?

1 (1456) p. 134: Places of historical, cultural...importance to Navajo people" should be located and identified. No evidence that Navajos and Havasupai interacted "by 1600's"; Navajos not as far west as the Grand Canyon until the 1880's (Euler 1974).

Frequency (I.D. Number) Comment

1 (2056) p. 248, Column 1, ¶ 1: "Because it is difficult to determine the significance of an artifact in an isolated location..." This statement concerning isolated occurrences ignores a whole body of literature on Landscape Archaeology (a.k.a., non-site archaeology, distributional archaeology) that looks not at single isolated artifacts but the distribution of those artifacts in what is really a sparse artifact scatter over the entire land surface. Moreover, by writing off the isolated occurrences, a de facto evaluation of significance has been made; they are not significant and therefore not covered under National Historic Places Act. This sentence needs to be rewritten.

1 (2057) p. 248: The discussion of eligibility determination is not correct. The SHPO does not determine eligibility; they only concur with determinations made by the lead agency. Also, in the second sentence of this paragraph, "eligibility" should be inserted between "require" and "testing." The second to the last sentence in this paragraph states that sites less than 50 years old are "...ineligible for inclusion on the National Register..." This is not true. Fifty years is a guideline, not a mandatory requirement. The last sentence says that all of the sites were included in the analysis because they will be greater than 50 years of age soon. It appears from earlier statements in this paragraph that some of the sites were ineligible because they no longer retained integrity, not because of their age. This should be clarified.

1 (2060) p. 249, Column 1, last paragraph, fourth sentence: The second to the last sentence discusses the ongoing evaluation of isolated occurrences, even though the beginning of the Cultural Resource section said the isolated occurrences would not be considered any further. This is confusing and needs to be rewritten to be consistent with the introductory remarks.

1 (2117) pp. 253–254: Results of ongoing research since the preparation of the Draft will require the Navajo Nation to modify the numbers under the Navajo heading in Tables IV-14 and IV-15. We also note that Traditional Cultural Properties that are also archaeological sites are mentioned in the Navajo section on p. 254 as being shown in Table IV-15. It should say "IV-14 and IV-15." Same with the paragraph on p. 252, headed "Archaeological Sites That are Traditional Cultural Properties." It should say Table IV-14 and IV-15. The same paragraph also contains the typo "...contemporary Indian Tribes people..." It should say either "...to Indian people..." or "...to Indian Tribes..."

1 (0964) Because the tribes were invited to the table and funded for research late in the process, incomplete data is available on resource inventories.

1 (0975) Correct boundary of Hualapai Indian Reservation on general map to delete Mohave: Coconino county line.

1 (1977) p. 50: The term "traditional cultural properties" is used here, but the term "traditional cultural places" is used on page 9. The term "traditional cultural properties" is defined and utilized in this document in terms of its eligibility or potential eligibility for nomination to the National Register of Historic Places; it should be consistently used throughout this document.

1 (1006) p. 132: In the "Hopi Tribe" section, citation for final NPS River Corridor Survey report will be Fairley, et. al., 1994, with Balsom as the principal investigator (p. 132).

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1 (2116) p. 251, Paragraph 4: We agreed before that the term "Hopi Salt Mine" would not be used in the general body of the text, only in the specific Hopi sections. This term is offensive to Navajos who use the same mine for religious purposes. We agreed to use the term "Salt Mine" with individual tribal names after it, if each tribe wished. The Navajo name for this place is Ashiih.

1 (1457) p. 135: Second paragraph is too generalized. Salt Mines in Grand Canyon not used by the Navajo. Provide evidence that "Southern Paiute continue to use Grand Canyon in traditional ways."

b. Impacts, Protection, & Monitoring

6 (0631) Realistic to expect that all of these sites were impacted on numerous prior occasions.

1 (1578) p. 248, Page 248, second column, ¶ 2: What level of flows would be necessary to affect the 336 sites? How many would be potentially affected at 35,000 cfs?

1 (2064) p. 250: Table IV-13 also states that "major impacts to traditional cultural properties would result from the No Action Alternative and that impacts from all other alternatives would be the "same as No Action." Yet in the text, analysis under each alternative states that impacts to traditional cultural properties would be less than that under No Action. This contradiction should be resolved, and using both archaeological sites and riparian vegetation as indicators for the Traditional Cultural Properties responses to the alternatives may better clarify the situation.

1 (1167) 75% of identified archeological sites have been impacted by erosion or unearthing because of the existence or operation of the dam.

1 (1579) p. 248, ¶ 2: The statement that a number of sites have lost integrity due to impacts from dam operations is not supportable. To our knowledge, there has been no attempt to separately describe the impacts resulting from the existence of the dam (lack of sediment for re-deposition), variations in yearly release volumes, daily fluctuations in flows due to power generation, and erosion due to runoff, wind erosion, and arroyo cutting. It can easily be inferred from this discussion that all impacts are due to fluctuating flows, which is not correct.

1 (2054) pp. 248–259: Two indicators identified for impacts to cultural resources in Chapter IV are numbers of archaeological sites and traditional cultural properties directly, indirectly, and potentially affected by the alternatives. However, these numbers are reported inconsistently and unclearly. The number of affected archaeological sites in each of the three impact categories is given in the text for only two alternatives: NAA and MFFA. The data are reported clearly and concisely under NAA (which would serve as a good prototype for the remaining alternatives), but are confusing in MFFA. Only two other alternatives, the MPPCA and HFFA, have numbers of impacted sites associated with them in the text; the total of all three impact categories.

1 (1583) p. 255, ¶ 1 under Maximum Powerplant Capacity Alternative: The implication from this is that arroyo cutting is linked to operations, which is not the case. While spring flows

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used to fill the mouths of the arroyos with sand nearly every year, this has no connection with down-cutting above about 33,500 cfs. The fact that the region has entered a wetter than usual period is not mentioned as a likely vector in site exposure.

1 (2063) p. 250: The Hopi Tribe recommends that a separate evaluation for Traditional Resources be used that utilizes riparian vegetation as an indicator. By using riparian vegetation as an indicator, there are some minor differences between the various alternatives.

1 (1582) p. 255, first column, last paragraph: The assertion that degradation of the entire ecosystem would be allowed to continue under No Action Alternative is not supportable as evidenced by the existence and vigor of certain post-dam resources. Perhaps the Southern Paiute meant to refer to a pre-dam ecosystem.

1 (1985) p. 13: Since the actual number of traditional cultural properties in the Glen and Grand Canyons is unknown at this time, the numbers of traditional cultural properties effected is not a reliable indicator. The Hopi Tribe recommends that a qualitative measure derived from perhaps the number of affected archaeological sites combined with the effects on the riparian zone may be a more accurate indicator of evaluating the alternatives' effects on traditional cultural properties. In this way, alternatives could be rated on the basis of a "greater or lesser" potential for adverse impacts to traditional cultural properties.

7 (0379) Analysis of preferred alternative impacts on cultural resources is deficient.

1 (2263) p. 248, Column 2, ¶ 1: Of the 475 sites believed to be directly impacted, apparently only a handful of sites would be helped by changing operations to the Preferred Alternative. This situation suggest a non-operational alternative is badly needed to prevent loss of the sites directly impacted.

1 (0952) Potential impact of research flows on Tribal resources could be catastrophic without protocols to govern research and coordinate with long-term monitoring and research.

6 (1922) Under SASFA or MLFFA (over No Action), the number of affected archeological sites will decrease from 336 to 157; twice as many sites are being damaged under current dam operation as would be the case with either SASFA or MLFFA.

1 (1963) Cultural resources would receive a reduced threat under SASFA because it will maintain higher elevation sand deposits.

3 (0265) The fluctuating flows have caused extensive damage to the Indian Petroglyphs.

1 (1580) p. 251: Isn't it true that beach: habitat building flows could have just as negative an impact on cultural sites as uncontrolled flood flows of the same magnitude? The positive-soundingterm, "building" does not necessarily have a bearing on the ultimate effect of these "managed" flows.

1 (1168) No alternative can stop impacts, but it is possible to slow the rate of erosion by maintaining net positive sand balance and enhancing sediment re-deposition to protect sites as much as possible.

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7 (0812) Vandalism of archeological and cultural sites may increase in canyon if additional beaches are created improving access, and around Lake Powell if water level is raised improving access. Address this issue.

1 (1995) p. 42, Column 1, ¶ 3, lines 7–10: "Cultural and archaeological impacts on tribal lands could be significant and, in the case of sacred sites, mitigation (avoidance) would significantly increase costs." This sentence should be rewritten to accurately reflect how this issue would be handled on tribal and other lands. Mitigation would be required for all sites (archaeological and otherwise) that would be impacted and would likely not be possible or permitted for sacred sites.

6 (1920) SASFA would provide the most protection for cultural sites and other culturally significant resources important to Indians, tourists, and scientists.

1 (1242) Historic preservation planners should consider in situ preservation as one cost-effective method for long-term site protection.

1 (0987) pp. 35–36: Under "Monitoring and Protection of Cultural Resources," we suggest replacing the last paragraph as follows: "This ongoing process of consultation and revision of preservation plans, in response to maintaining the integrity and stability of the properties, should help to minimize or mitigate the adverse impacts of the operation of Glen Canyon Dam on cultural resources. Details of the Programmatic Agreement can be found in Attachment)."

1 (1650) A17: In third paragraph will the "remedial actions" be operational or structural?

2 (0788) Hope cultural resources will always be part of Adaptive Management Program and monitoring and research.

7 (0810) Question whether a long-term monitoring plan is best protection for cultural resources sites.

1 (2287) A17, p. 4: Each site visited will require time, manpower, and money, and should be justified. Number of sites suggested (i.e., "ca. 20%") is vague, probably for good reason, but some criteria for inclusion are needed other than ones given. Sample size should be minimized since we are attempting to provide only sufficient data to decision makers to allow them to make an informed decision on dam operations, not studying impacts. Also, program will be used to modify operations on some long-term scale that is likely to be unresponsive to short-term, rapid changes. Sites with potential for rapid degradation should be included in a NPS action program.

1 (1169) Monitoring of cultural cites must be non-invasive; support recommendations of National Research Council to accomplish this.

1 (2083) A16: This section should be modified to reflect the Monitoring and Remediation Plan developed for the Programmatic Agreement. Once the Historic Preservation Plan is drafted, it should also be included.

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1 (2082) A4, Paragraph 2: The costs of the monitoring of cultural resources defined under the Programmatic Agreement are not a separate program from that which is assessing the impacts of dam operations (Long Term Monitoring).

1 (1991) p. 36: "Discontinuing monitoring" and "monitoring with cameras or sensing devices" are not remedial actions. Rather they are decisions regarding the level of monitoring effort. These should be dropped from this list.

1 (2084) A17–18, Last sentence on p. 17: Think it would be good to structure monitoring of cultural values "...to allow for quantitative analytical techniques..," but perhaps this statement masks an underlying and pernicious "scientism" in monitoring program. Cultural values should be accepted for what they are and not be subjected to scientific reductionism. This statement should be rewritten to read: "The objective of this program is to monitor these values and attitudes on an ongoing basis and to structure them to allow for qualitative and quantitative analytical techniques and to determine possible changes in attitude or values in relation to dam operation." While many of the physical scientists are unfamiliar with contemporary method and theory in social sciences, there is a body of literature supporting methodological basis for conducting "qualitative research" in social sciences as viable and respectable.

c. Management Responsibility - Tribal Responsibilities

1 (0190) Let the Indians work to preserve their historical sites.

6 (1925) The U.S. has a trust responsibility to Native Americans to protect and maintain cultural and spiritual sites that would be adversely affected under No Action.

1 (1983) pp. 4–5: When the Hopi people emerged into this, the Fourth World, from the Sipapuni, they encountered Ma'saw, the guardian of the Fourth World. A spiritual pact was made with the Deity Ma'saw, wherein the Hopi people would act as stewards of the earth. Today, the Hopi people continue to honor and abide by this pact to act as stewards of the earth. Even though the U.S. Government has made many past decisions that placed the majority of the aboriginal lands claimed by Hopi under the jurisdiction of other political bodies, the Hopi continue their stewardship. This stewardship, while not officially recognized by the Federal Government, is very real to the Hopi people and should be recognized here as a management responsibility. Perhaps the first paragraph from Appendix A-6 could be inserted in this section.

1 (1693) p. 305: Discussion of Indian Trust Assets and conclusion about Hualapai Tribe's claim need further information. Discussion of resources in Chapter 4 are not specific to the Tribe's resources with the exception of cultural resources. EIS should document affected tribal resources if a statement regarding a conclusion is made, such as on p. 305. Should also refer to Secretarial Order 3175 in this section of EIS.

1 (2122) p. 305: However, the DEIS was not developed in a manner consistent with the trust responsibility. The procedure for how agencies within the Department of the Interior are to meet these responsibilities has been clarified in Secretarial Order 3175, November 8, 1993. The order directs these agencies "to ensure that the trust resources of federally recognized

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Indian tribes and their members...are identified, conserved, and protected." The Secretary's order clarifies that all Interior agencies, including FWS, are "responsible for being aware of the impact of plans, projects, programs, or activities on Indian trust resources" and requires consultation with the impacted tribal government. The required consultations with respect to the RPA have not occurred.

1 (0967) Information related to cultural sites and other Tribal resources is sensitive though necessary to development of scientifically credible and legally defensible program. Hope plan for scientific information management will reflect need to satisfy and respect Tribal interests.

1 (1998) p. 53: Current political boundaries reflect arbitrary decision imposed by the U.S. Government on Indian people and does not correctly reflect or recognize the Hopi people's long historical stewardship responsibility to the Grand Canyon. The Programmatic Agreement, appended to this document, recognizes the Hopi Tribe's management responsibility and involvement regarding traditional cultural properties within the Glen and Grand Canyons. This should be included here.

1 (1996) p. 53: The Native American Graves Protection and Repatriation Act recognizes that there are certain resources (i.e., human remains, associated funerary items, sacred objects, and objects of cultural patrimony) located on lands under the jurisdiction of the Federal Government that are not owned by the U.S. Government. Instead, ownership is vested with the lineal descendent and: or the culturally affiliated Tribe. Therefore, the Hopi Tribe has a ownership and management responsibility to these resources located within the Glen and Grand Canyons. This should be included here.

1 (1992) p. 36: Somewhere within the section entitled "Monitoring and Protecting Cultural Resources" a discussion of the treatment and disposition of ancestral graves is warranted. Included within this discussion should be the method of compliance by the NPS with the Native American Graves Protection and Repatriation Act. Perhaps the development of a Memorandum of Agreement between the NPS and the appropriate Tribes is necessary and should be included with the Programmatic Agreement.

1 (2080) p. 305, Column 1, last paragraph: The first statement in this paragraph is not correct. The Native American Graves Protection and Repatriation Act identifies all ancestral human remains, associated funerary objects, sacred items, and objects of cultural patrimony that are contained within archaeological sites on federal lands as the property of the culturally affiliated Tribe, not the United States Government. Therefore, they are currently trust property until the Tribe claims legal jurisdiction over them.

1 (2123) p. 305: Where Indian trust resources are at stake, Secretary is prohibited from making decision based on judgment call. Pyramid Lake Paiute Tribe of Indians v. Morton (*). Where Secretary is faced with two plausible alternatives, but one alternative would protect tribal economic interests, he must choose alternative that benefits Indian tribe. Jicarilla Apache Tribe v. Supron Energy Corp (*). In the DEIS, two alternatives are being actively considered: MLFFA, which has demonstrably beneficial impacts on endangered fish and which has less adverse impact on Indian trust resources; and SASFA in form of RPA, which has, at best, only speculative benefits for endangered fish, has potential adverse consequences for fish, and has known adverse impacts on tribal economies and Indian resources. Trust

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responsibility, Endangered Species Act and NEPA demand selection of MLFFA as Preferred Alternative in EIS process and dismissal of SASFA in form of RPA.(*) (Complete citation in document.) (Navajo)

d. Legal Considerations

1 (2022) p. 131, Column 1, ¶ 3: "These Native American traditional cultural properties are tangible historic properties eligible for the National Register..." A reference to Section 101(d)(6)(A) of the recent 1992 amendments to the National Historic Preservation Act recognizing traditional cultural properties as Register eligible historic properties is warranted.

1 (1493) Summary p. 9: The National Historic Preservation Act (NHPA) "guidelines" are actually regulations, that together with Executive Order 11593 and the 1980 Amendments to the NHPA, assume the force of law.

1 (1984) Summary p. 9: Include Religious Freedom Restoration Act of 1993. The Religious Freedom Restoration Act (P.L. 103-141) was passed by Congress on November 16, 1993. The purpose of this Act, as determined by Congress, is to restore the compelling interest test as set forth in Sherbert v. Verner, 374 U.S. 398 (1963) and Wisconsin v. Yoder, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is burdened, and to provide a claim or defense to persons whose religious exercise is burdened by government. In general, this Act provides for the protection of the free exercise of religion and that the Federal government shall not substantially burden a person's exercise of religion even if the burden results from a rule of general applicability.

1 (1690) p. 9: Discussion of the Executive Order establishing Havasupai Reservation should be included as their lands are adjacent to the study area. Please note that the Executive Order for the Navajo Indian Reservation should be double checked as the Reservation was initially established by treaty in 1868. The remaining information within the paragraph constitutes additions to the Navajo Reservation.

9. Air Quality - 29 statements dealt with this subject.

a. Analysis

4 (0191) Air quality in the canyon has not been addressed adequately.

7 (0380) Analysis of preferred alternative impacts on air quality is deficient.

5 (0814) Analysis in air quality section not scientifically valid; prevents constructive comment. Provide further information so model can be evaluated.

5 (0815) Air quality data is incomplete. It does not account for carbonaceous matter, support 50% increase in summer sulfate levels (p. 138), etc. Please address.

3 (1420) The effect of possible use of fossil fuels on the air quality in the area is not adequately addressed in DEIS.

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1 (1906) An analysis is needed that quantifies increases in polluting emissions ($S0_2$ and NO) that would occur with reductions of non-polluting peaking power from Glen Canyon Dam.

1 (1001) p. 58: Change "Regional Air Quality" on table II-11 to "Integrated Power System Emissions." Discussion of this issue omitted from previous draft. Believe that this is resource issue with potential impacts that was identified and should be included in EIS. Use wording "Impacts are summarized in terms of emissions of atmospheric pollutants from the integrated power system." (p. 58).

1 (1878) Summary p. 52: The estimate of 240 miles seems too large.

b. Impacts

1 (2078) pp. 259–263: NEPA differentiates between reasonable and foreseeable impacts and remote and speculative impacts. Former must be included in an EIS; latter need not be. If lead agency for an EIS decides to disclose remote and speculative impacts, it must identify them as such. Much of air quality analysis arguably falls in this category. Reasonable and foreseeable that a loss of peaking power from Glen Canyon Dam would result in a power shortage, but remote and speculative to assume that shortage (or some percentage of shortage) would be made up by fossil fuel plants. More speculative to estimate that air pollution would increase by x amount of tons per year. Too little is known about developments in power generation technologies, demand for power, public attitudes, and political and economic climates over next 50 years to make more than speculative projections. Label as such.

1 (0767) The slight impact on air quality is acceptable.

10. Recreation - 141 statements dealt with this subject.

a. Importance

9 (0462) River runners only: biggest winners in this process.

1 (1910) Amazed that recreational uses along the river have such a prominent status in DEIS.

b. Issues of Concern

1 (1522) Summary p. 54; main doc. pp. 144–145: The fishing safety issue has been overemphasized; caused the public to perceive that there is a problem that needs solution. Recorded accidents show actual accident rate was on low end of normal for big river recreation, even with limited access, white water, and the climate of the Grand Canyon. NPS makes more rescues for canyon hikers than for rafters or fishermen. This comparison should be made to provide perspective. The element of risk is a factor that attracts rafters to the Grand Canyon!

10 (0443) Pre-dam recreation use limited by changing flows; dam improved safety.

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1 (2186) p. 138, Column 2, ¶ 2: The advent of stable flows has reduced the risks and allowed recreation use of the river riparian corridors to increase dramatically including such uses as hiking, camping and rafting. The DEIS should provide a discussion of these reduced risks.

1 (0784) Idea that boating is safer because of dam makes no sense. Rivers are rivers.

1 (1453) p. 99: DEIS shows rapids will continue to increase in steepness and constriction coefficient will continue below "natural values." This is contrary to statement in Summary, which says Preferred Alternative will improve boater safety.

1 (1588) p. 265, first column: The emphasis on potential fisherman inundation is not supported by the number of recorded incidents. Controlling Glen Canyon Dam releases seems to be a very inefficient way to deal with rare incidents that probably have other significant contributing factors. Angler awareness of potential changes in river levels could be increased by posting warnings, brochures at Lee's Ferry parking area and Glen Canyon Dam, and encouraging use of existing toll-free hotline.

2 (0192) Boater safety could be improved without costly changes.

1 (0872) Install a warning system that will alert all river users of approaching high waters.

1 (1780) SASFA provides increased angler safety over MLFFA.

7 (1779) SASFA greatly decreases risks of white-water boating accidents compared to fluctuating flow alternatives.

7 (0321) Recreationists need the beaches.

1 (1008) pp. 53–54: DEIS Summary on pages 53 and 54 gives no identification of lake activities and facilities although they are listed as "Indicators." This section also mentions fishermen going upstream from Lee's Ferry, but does not mention sightseers going upstream from Lake Mead to see lower Grand Canyon, which is as valuable as the fishing enjoyment at Lee's Ferry.

9 (0727) MLFFA will lead to better flows, camping, and recreation.

12 (0828) SASFA provides major improvement in white-water trip quality, wilderness value, handicapped access, and camping beaches.

1 (2106) p. 139, Paragraph 10: Limiting the discussion on flow related effects on fishing to raising waters improving fishing due to increased drift and low flows limiting access ignores the relationship of productivity of the trout fishery to fishing success and the relationship of flow to productivity. This relationship should be referenced.

10 (0495) River running and recreational tourism require periods of regulated water flows.

1 (2190) p. 143, Column 1, ¶ 1: Under hydropower releases, commercial rafting below Glen Canyon Dam has blossomed to a multi-million dollar industry with over 50,000 users per year

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from less than 600 immediately pre-dam. This industry is occasionally inconvenienced by hydropower releases when rafts are left dry by an overnight drop in stage, refloated by an increase or required to negotiate rapids under differing conditions. The DEIS should explain the actual problem and put it in some perspective relative to other issues.

1 (2265) p. 265, Column 2, ¶ 3: This industry is occasionally inconvenienced by hydropower releases when rafts are left dry by an overnight drop in stage, refloated by an increase, or required to negotiate rapids under differing conditions. What measure and value of this inconvenience has been made?

1 (2107) p. 143, Paragraph 3: The assertion that a dam has allowed rafting to be undertaken throughout the year is without basis and is classic misconception that should be corrected in the DEIS. Grand Canyon has been run repeatedly at and below 1,500 cfs. Cataract Canyon on the Colorado River above Lake Powell, which is essentially unaffected by dam regulation, has never been closed to rafting because of low flows.

1 (1739) Lower peak flows did not reduce white-water experience.

1 (1604) p. 75: In the last sentence in the first column, please add that rafting and angling can also be affected by ramp rates.

1 (1000) p. 53: The section on Recreation fails to include the idea that flows should allow navigation by power boats from Lake Mead into the lower reaches of Grand Canyon. If river flows do not allow navigation of this stretch, there is considerable impact to public enjoyment of the canyon.

2 (1315) Summary p. 39, p. 70: Statements about exposing submerged cobble could be misinterpreted and need clarification that exposure is not a function of rate at which discharge is decreased.

1 (2191) p. 143, Column 1, ¶ 3: Rafters camp on sand beaches created during high, flood flow events and a change in beach availability would require some parties to crowd onto remaining beaches. The DEIS should explain why this is expected to be a problem.

1 (1521) Summary p. 54, ¶ 1: Low flows will probably only result in more usable beach area for the short-term. The stability afforded by lower fluctuations will encourage more rapid colonization of beaches by riparian vegetation, a process recognized elsewhere in this document. Similarly, while large fluctuations cover some beaches at some times, they also serve to minimize vegetation encroachment.

1 (1589) p. 277: It is probable that more camping area would be available under the EMVSFA, but it would only be for the short-term; in the near long-term, vegetation encroachment would be encouraged by steady flows.

1 (2119) p. 266, Paragraph 8: The discussion of camp site distribution within critical reaches assumes that size and number of camps is fixed through time and is constant between alternatives. This is not the case. Size of individual camps is affected by sediment erosion and deposition and vegetation encroachment, and these factors vary between alternatives. To

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merely compare alternatives on the basis of area available for camping above the maximum stage of the different alternatives is overly simplistic and does not characterize the impacts of various alternatives to camping beaches commensurate with the analysis of sediment resources presented in other section of the document.

1 (0670) Waiting period for private permits on p. 143 should be 10–12 years.

1 (1007) p. 142: Edit first paragraph of "White-Water Boating" to indicate that 17 commercial companies now operate within the Grand Canyon National Park.

1 (1002) p. 58: Under Recreation, please add white-water trip quality and the recreational environment to both the discussion and Table II-7.

1 (0692) Suggest 5% of commercial user days be reserved for special access trips supported by power and water funds.

1 (2187) p. 139, Column 1, ¶ 3: The DEIS should explain that blue-ribbon fisheries have developed below dams in the Colorado River drainage even with hydropower releases that raise and lower flows.

1 (2188) p. 139, Column 2, ¶ 3: Loss of individual trout may occur as a result of stranding from hydropower releases during spawning when some fish move into shallow areas and this may detract from the angling experience for some people. Trout populations in the tailwaters are probably not sufficiently affected by hydropower releases to impact the numbers of fish available to sustain angler enjoyment. The DEIS should explain these differences.

1 (2189) p. 140, Column 2, ¶ 3: Trout populations in a dam tailwater may be affected by a maturing reservoir until it reaches an equilibrium. This may occur possibly decades after creation, because released water is likely to decrease in its potential to sustain high productivity due to changing nutrient conditions in the reservoir and its watershed. The DEIS should mention this expectation.

2 (1355) p. 140: Discussion of stocking and fishing regulations as efforts to improve trout productivity should be clarified (system far from natural, etc.).

2 (1358) p. 140: Large numbers of fingerling and sub-catchable trout also were stocked from 1964–1971 (Maddux et al. (1987) Appendix 11.2).

2 (1359) p. 140: Are there data to show that "Gammarus became a major part of the trout's [trouts'] diet around 1971"?

2 (1356) p. 140, Paragraph 2: Last sentence is misleading; citation should be Maddux, et al. (1987 or 1988) to clarify estimates on trout productivity and period to which they refer.

2 (1360) p. 140: Persons, et al. (1985) stated that "yield of fish (trout) at Lee's Ferry increased four-fold from 1977 to 1983, then decreased about 75% in 1984." Does this conflict with statement "the fishery declined in productivity since 1978?"

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1 (1643) p. 264: Text description of impacts on recreational fishing do not seem to match information in the summary table. (FWS)

1 (1587) p. 263, Recreation: This section discusses the impacts of the alternatives on recreation and recreation economics. Alternatives that benefit recreation attributes would likely result in increased recreational pressure on Grand Canyon's aquatic, riparian, and cultural resources. The impacts of enhanced recreational activity are not addressed in this section.

2 (0882) Rafting increased from 350 to approximately 22,000 per year since dam closure. Is kept lower than possible numbers by NPS restrictions.

2 (0881) Recreation use of beaches and shoreline up from 205 user days per year to 170,000 per year since dam closure.

1 (0287) Recreationists try to preserve the beauty of the canyon and so should other users.

1 (1957) Please indicate what human use patterns within the river corridor should be adjusted to minimize impacts.

1 (2264) p. 263, Column 2, ¶ 4: Approximately 320,000 user days per year use beaches and shorelines, yet no alternative management approach is offered to decrease impacts on beaches, wildlife, vegetation, etc. Another example where non-operational alternative actions are available but avoided in favor of operational changes-only approach. Avoidance should be explained. White-water rafters have grown from 205 to 22,000 people per year in 30 years since dam closure, yet report describes how present operations impair naturalness of setting. Again, people management as alternative to reduce impacts to beaches, etc. is avoided.

4 (0302) Limiting the numbers of people using the canyon will help clean up air and ground pollution.

3 (1381) Recreation below Glen Canyon Dam should be eliminated because of adverse human effects on ecological balance of river's ecosystem.

1 (1912) When national parks: campgrounds being decimated by overuse and commercial abuse, ironic and pathetic to go to so much trouble looking for excuses to fling open doors of yet another precious, relatively protected landmark.

4 (0193) People are ruining the parks, including Grand Canyon National Park, and should have to get permits to go there until they can be restored to their original beauty.

1 (1879) Summary pp. 53–54: Duck hunting occurs from the Dam to Lee's Ferry. What is the extent of this recreational activity, and how will it be impacted?

5 (1114) Recreation plays an important role in our economy.

1 (1458) p. 155: DEIS states that the "Bennett Freeze" precluded the Navajos from developing recreational business on the river. Also notes that it has been lifted but does not say how Navajo rights for future business development going to be managed. How many Navajos are

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employed by non-Navajo business, etc.; minimizes importance of tourism economically to Tribe.

1 (2306) Need further investigation of generating income from recreational and tourism fees.

2 (0709) Recreational user fees cannot offset power losses.

1 (1781) SASFA provides the greatest annual net benefit to recreation economics.

1 (0267) The EMVSFA will provide approximately $44 million in recreational economic benefit.

1 (2266) p. 279, Column 2, ¶ 2: Recreation values are overstated. Estimates are based on results of 1987 survey. Procedures in survey estimated total surplus value for various recreation activities in Grand Canyon through contingent value method. Flows was one factor considered when estimating surplus values of recreation activities. Difference between contingent values for different flows used as indicator of value of each recreation activity. Resulting contingent values included values for other factors besides flows. No attempt made in 1987 study to determine what portion of total recreation values corresponded to changing flows. Since changing flows are basis of DEIS alternatives, it is necessary to use values that correspond only to this variable. Recreation values used in DEIS are overstated by as much as 50 percent and possibly more. Problem should be addressed in FEIS. (CREDA)

1 (2118) p. 264, Table IV-17: We are unable to determine from the discussions in the text how the values under Economics, Equivalent Annual Net Benefit, where derived. The tables presented in the section, "Economics of Recreation Use," which begins on page 279, do not contain values, summary or otherwise, that correlate in any way with those presented in Table IV-17. This situation must be corrected. We also question the utility of an aggregate value for all recreational resources as a meaningful parameter for comparison of alternatives. We suggest that an additional stand-alone table for recreation economics be included,

1 (1651) A18: Has the non-use program been approved for use in the EIS as well as the Long-Term Monitoring program? If so, Recreation section should be updated.

11. Hydropower - 64,731 statements dealt with this subject.

a. Importance of Resource

164 (0215) Glen Canyon Dam was built because we needed the power it would produce.

129 (0543) Federal hydropower is one of the lowest cost power sources available.

44 (0211) Current dam operations produce 4 billion kilowatt hours of clean inexpensive electricity.

450 (0621) Hydropower is a never-ending supply of energy that doesn't deplete our natural resources.

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1 (1918) There will never be any way to generate electricity that has no environmental consequences.

10 (0868) Cleaner power needs are more beneficial than the changing of some beaches.

8 (0214) Electricity should be the last priority, ecological geological and native resources must come first and recreational considerations second.

5 (0200) There are many other factors that are much more important than the "bottom line" of the utilities balance sheet.

10 (0271) The power company's bottom line is not the most important factor.

57 (0216) People want the most efficient use of these power resources.

1 (1459) Navajo Tribal Utilities receives at least part of its power from Glen Canyon Dam, giving Tribe direct interest in power generation from the Dam. This and similar interests of the other tribes need to be clearly defined in FEIS.

4 (0503) Public power helped make a success out of Glen Canyon Dam and CRSP projects.

12 (0496) Power users made commitment to development of a region and its resources.

6 (0556) EIS makes little mention of the sacrifices power users have already made for Grand Canyon. Already paid for GCES studies.

56 (0533) Not fair to interrupt power delivery to those who paid to build the facility.

9 (0456) Everyone (environmentalists, fishermen, recreationists) wants his power.

11 (0213) Are we to continue to deface a wonder of the world to power air conditioners in L.A., Phoenix, and Tucson?

9 (0640) Even with conservation, demand for electricity will continue to grow.

2 (0584) Two percent growth common in area ensures doubling of power requirements in 35 years.

61 (0540) Demand for power will continue to grow; reduced use of electricity is not an option.

6 (0559) In areas that are growing, incoming population does not bring power and water with them.

4 (0776) To say we need more power may mean we need less people. Population has not been addressed.

1 (1816) Western must have some idea of future generating needs; resolve conflicting reports of energy demand.

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2 (1193) DEIS never quantifies how much energy would be shifted from on-peak to off-peak in each scenario. FEIS should identify, for each scenario, the weekday and weekend on-peak and off-peak periods and the expected generation in each of those four periods for each month of the year.

115 (0295) Peak power demands must be removed or dramatically reduced.

11 (0840) Eliminate peak power contracts and fluctuations unless science demonstrates they are environmentally benign.

118 (0212) Reclamation should eliminate peak power contracts at the dam entirely so that power interests won't try to weaken protection programs. Make clear dam won't be a peaking facility.

1 (1441) p. 49: FEIS should report on status of Hoover Modification Project and discuss possible use of it as replacement for Glen Canyon Dam peaking power and mitigation of adverse effects of changes at Glen Canyon Dam.

17 (0416) Use Hoover Dam: Flaming Gorge to take over production of peaking power.

2 (1720) Shifting peaking power to Hoover Dam is only a "paperwork exercise" transferring contracts, and is easier than rebuilding an ecosystem.

1 (1840) Loss of Glen Canyon Dam peaking power not an issue, since Hoover Dam's producing capacity has been uprated and is also capable of meeting peaking power needs.

1 (1730) Moving peak power to Hoover dam may require some law changes, etc., but is an option that deserves further analysis and consideration.

1 (1729) Moving peak power to Hoover dam would make steady flows less costly as compared to fluctuating flows.

1 (1429) Support decision not to transfer peaking power to Hoover Dam because of possible impacts on critical habitats, sport fisheries, and recreational use of Lake Mead.

1 (1222) Spot sales of peaking power could continue if consistent with Grand Canyon Protection Act requirements.

b. Cost of Power

4 (0199) We pay far too little for electricity as compared to the rest of the world.

3 (0534) Glen Canyon Dam power was not cheap when subscribed. Required investment in lines, etc.

3 (0549) The cost of CRSP power when agreements were entered into was higher than if we had built thermal plant.

Frequency (I.D. Number) Comment

5 (0581) Original price was high (capital driven), but expected decline over years and resulting economic growth made it seem right.

1 (0209) Operation of Glen Canyon Dam affects the price of electrical power in Page, Arizona.

1 (1297) Preferred Alternative could boost electric rates in rural Colorado by eliminating peaking power at Glen Canyon Dam. Utilities will have to replace power.

2 (1093) Electric utilities estimate that implementation of Preferred Alternative will cost their consumers hundreds of millions of dollars annually.

2 (0198) Proposed changes would cost the typical family using electricity $40 per year.

1 (1099) SASFA will increase power rates and environmental pollution (due to increased use of fossil fuels) if implemented.

1 (1717) Every effort should be made to hold the line on power costs.

3 (0480) People are going to pay some additional cost, but those decisions should be made with reason.

2 (0205) Higher rates need only be interim and may not be needed if we inaugurate powerful programs to use alternative energy sources (solar and wind especially), combined with incentives to save energy.

1 (1903) A sensitivity analysis showing benefits associated with historic "real" power escalation costs should be displayed.

39 (0204) I am only too happy to pay more for electricity to see improvements.

6 (0206) Resulting increase in the cost of electricity is nominal; it's still a good deal.

1 (1742) Believe the increase in power cost is acceptable if SASFA is implemented.

12 (0202) Increase in power costs seems minimal and acceptable.

2 (0207) Worrying about increase in power cost is narrow-minded and selfish.

18 (0203) I am willing to pay the increased cost to ensure less erosion, increase in habitat, and stability of native species.

11 (0299) If we have to pay more for electricity, we will learn to conserve it and not waste it.

1 (1971) SASFA, which is best alternative for downstream resources, still provides power to Western's customers at rates significantly below market.

1 (0275) It would cost Page Electric Utility twice as much as we currently pay to replace power lost under MLFFA.

Frequency (I.D. Number) Comment

1 (1860) Cost associated with changes amounts to at least $41 million—not insignificant however divided.

1 (0520) Dixie Escalante Rural Electric Assn. customers will have to replace $3 capacity with $31 capacity, 100% increase.

10 (0615) Will be unhappy with increased power cost if decision made puts fish more important than humans.

1 (0863) Hurts to know I will be paying more for getting power from "unclean sources." I would be happier paying more for hydropower.

1 (1101) Opposed to increase in power bill if it is to be imposed because of unproven suppositions and a political ploy on the part of FWS.

1 (1104) Power industry will use any excuse to raise rates whether needed or not.

6 (0414) Eliminate subsidized power.

7 (0736) Power users should begin to pay the true costs of power production.

2 (0604) Law requiring Western to sell power cheaply should be changed.

3 (0404) Consider the elimination of subsidized power projects that encourage wasteful use.

4 (0737) Hidden cost of subsidized power should not be borne by the environment.

1 (1789) Only real cost of treating Colorado River with respect and restoring its hydrograph to resemble pre-dam flows is power consumers might be forced to pay fair market rates for electricity.

1 (0722) Subsidizing energy to pump ground water and raise crops has caused water problems and expense of CAP. Eliminating subsidy may solve problems.

3 (0497) To say there is a giant subsidy is a lie.

1 (0711) Statement in DEIS about CRSP power being used for irrigation is misleading, especially as referenced to CAP.

1 (1891) EIS process is a second guess at benefit: cost analyses made prior to Glen Canyon Dam construction and upon which reimbursable and non-reimbursable costs were allocated.

12 (0277) Power generation: users pay for the cost of the dam, the interest on the loan, and other reclamation projects; water users alone can't. Also paid for research.

4 (0578) Changes will affect how and how long it will take to repay the project. Define reallocations in FEIS.

Frequency (I.D. Number) Comment

2 (1401) Large capital investment to build facility should be amortized as fast as possible; demands generation and sale of product at optimal levels or price increase.

1 (1414) Who is paying the cost of the uprating and rewinding of the generators at Glen Canyon Dam. Are impacts of inability to use these improvements considered in DEIS?

1 (1857) A 50% generating reduction should result in a similar decline in the capital costs power users should be responsible for in Reclamation repayment studies.

1 (1892) DEIS attempts to allocate more of Dam facilities to non-reimbursable uses after most of facilities have already been repaid as reimbursable costs.

1 (1858) Payments being made to decrease government capital cost of excess generation capacity should be redirected to reduce adjusted capital that power users are asked to retire in the repayment studies.

2 (0702) Reclamation has no business reimbursing power users for environmental resource to which they have no right.

7 (0278) Who (FWS and: or Reclamation) will pay the bills for replacement power to supply firm contracts that are currently in force?

12 (0390) The DEIS does not: should propose a method to compensate SRP and customers for loss estimated at $80 million per year from generation facilities. All should help bear the burden.

14 (0526) Who is going to pick up the cost of the lost generation revenues?

4 (1044) DEIS is unclear on whether the economic and financial costs projected for power for the various alternatives reflect savings that could be realized by reasonable demand-side management.

5 (0614) Institute power pricing structures that encourage off-peak residential and industrial use as way to reduce demand for lost peaking power.

1 (0598) Shift burden of cost increases to big users by altering rate structure to lessen impact on those least able to pay.

11 (1403) Environmental pressure groups are not concerned with the people who will pay for the changes they seek.

2 (1386) Let those who are committed to restricting flows pay the increased cost of our utility bills.

3 (0415) Power producers: users should pay for the damage to the Grand Canyon area.

Frequency (I.D. Number) Comment

c. Impacts of Proposed Changes in Dam Operation

2 (1295) Changes in dam operation would result in lower marketable capacity, lower on-peak energy, and greater amounts of off-peak energy.

25 (0272) The MLFFA would cause a significant loss of non-polluting hydroelectricity.

5 (0289) The MLFFA will still produce power for the many.

1 (0660) Western may have to change the way power is marketed.

1 (1713) Power demands vary annually and need to be met by varying the dam operating schedule.

1 (0851) There needs to be a set of management strategies up front—not a target that moves with each new study or theory.

3 (0945) Preferred Alternative will allow continual tinkering with dam operation, creating the worst possible scenario for power planners. Creates less certainty about future of hydropower resource.

2 (1845) Primary concern is loss of clean, environmentally sound generation, idling nearly 1: 3 of generation capacity majority of time.

10 (0463) Cutting 40% of ability of Glen Canyon Dam to generate.

13 (1105) As much as one-half of power generation is to be lost at certain times of the year. These times coincide with peak power needs of one of Colorado River Storage Project purposes—irrigation.

1 (0550) Cutting capacity by 400–800 megawatts is like cutting power to 8 to 16 cities the size of Bountiful.

3 (0499) FWS provisions are unnecessarily destructive of power generation value.

4 (0451) Interim Operating Criteria caused significant damage to generation capacity.

1 (0274) Under MLFFA, the loss of CRSP capacity for Page Electric Utility should be 31% summer and 35% winter.

3 (1415) Among the fluctuating flow alternatives, the Preferred Alternative results in the greatest loss of hydroelectric power and is the most expensive because of its impact on power generation, especially when the effects of the research flows are considered.

2 (0319) The preferred alternative would allow only 60% of the generating capacity to be used at a cost to power users of $41 million per year.

Frequency (I.D. Number) Comment

1 (0716) Power can still be produced; no loss of generating capability. Just produced at constant rate under SASFA.

8 (0829) SASFA has only one disadvantage: a 5% increase in retail electricity rates.

1 (1100) If SASFA is implemented, 62% of generation capacity will be lost.

30,105 (0306) Cutting power generation at Glen Canyon Dam will force: has forced up power rates. Take all cost impacts into account fairly.

2 (1389) Restrictions will drastically reduce the value of energy by moving generation from peak to off-peak periods; result in reduced revenues, higher rates, and need for replacement of lost capacity and peaking power.

1 (1973) Only limitation to power generation should be lack of water storage above the dam.

1 (1732) Requirements of electrical generation bear no resemblance to natural stream flows.

1 (0568) Changes will reduce Western's ability to function as control area operator and operate as host player in power pool.

2 (1172) Changing operation of Glen Canyon Dam will have impacts on the interconnected electric power system throughout the Western United States.

2 (1422) Rise of Regional Transmission Groups, National Energy Policy Act of 1992, Clean Air Act Amendments of 1990, and initiatives like those of California Energy Commission will change energy demand and utilization patterns in West affecting surplus of electricity mentioned in DEIS. Consider these factors.

6 (0490) EIS should propose a mechanism to keep electric utilities whole.

1 (1715) Carefully weigh any reduction in dam generation ability against potential power replacement sources.

4 (1111) Power may have to be replaced by building another source at a great deal of expense.

2 (1424) Preferred mix of replacement resources and additional needed facilities is weak. Recognize peaking use and amount of peaking facilities and transmission reconfiguration (gas fired relatively unreliable and labor and maintenance intensive).

1 (1585) p. 259: Do not agree with position that power impacts are minimal because existing surpluses can be used as offsets. Using surpluses moves up construction of new capacity, and NEPA analysis requires that surpluses be replaced to assess true impact of proposal. Ultimately, lost capacity must be replaced by constructing and operating new power generating sources, and impact of changing Glen Canyon Dam operations must include these impacts.

Frequency (I.D. Number) Comment

2 (1421) Handy Whitman Steam Index has for years provided reliable reference for the estimation of costs of new generation, yet no mention is made of this source of information in DEIS.

1 (1393) Section 1809 of Grand Canyon Protection Act mandates identification of economically and technically feasible methods of replacing power generation lost through changes within two years. How can directive be carried out while 5–10 year research program is done?

698 (0210) Changes are not justified: benefits don't justify costs.

452 (0625) Strongly protest any reduction of power generation flows.

123 (0616) Using hydropower makes the most sense on balance; cutting available capacity is irresponsible: questionable.

3 (0583) The use of murky issues to tear down an existing part of region's infrastructure is incredible: beyond compensation.

1 (1707) Until a cleaner method of power generation is developed, postpone any drastic measures that restrict power generation from the dam.

3 (0855) Delay implementation of controlled water release until a plan is in place to replace the lost hydro-electric power.

4 (0888) Negative direct impacts to hydropower dwarf positive impacts resulting from flow changes.

1 (1911) DEIS advocates building new 500–800 megawatt power plant so a few relatively affluent rafters and fishermen can leave their trash along the banks of Colorado River.

1 (0522) If we destroy utilities and pass on 100% rate increases, we destroy economy based on and around river and destroy Grand Canyon.

5 (0579) Should consider affect of changes on our nation's food system.

27 (0505) Little consideration is given to societal costs of abandoning clean renewable hydropower such as quality of life, increased respiratory illness and pollution.

1 (1854) DEIS gives improper consideration to treatment of costs associated with impact of proposed change on the rural member user.

43 (0557) Process ignores impact on the quality of life of individuals who use: lose power; should be part of FEIS.

1 (1861) Give increased consideration to the electrical end-user.

3 (0644) Don't economically devastate people over a whim.

Frequency (I.D. Number) Comment

8 (0564) Public power customers never had a voice at the table.

3 (0517) Power people willing to take hits if science showed it was necessary to protect Grand Canyon.

180 (0208) Minimize the impact on those who will pay: have paid the bill.

2 (0580) Surprised federal officials see power contracting utilities as special interest groups with sweetheart deals.

9 (0560) Power users signed contracts in good faith. Too bad Federal Government is immune from breach of contract suit. If we did this, we would be sued.

37 (0563) Take into consideration the economy of the rural west.

2 (0535) Don't expose us to a large monopolistic utility that will have to get larger to meet our needs.

5 (1390) The increased power rates will adversely affect the many users of Colorado River Storage Project power for municipal, domestic and irrigation uses.

14 (1387) Consider impact of cost increases on families; already difficult for even two income families to provide necessities such as power.

2 (1417) Increased costs will have greater effect on those who heat with electricity, large industrial users, those who irrigate who will bear much greater burden than shown by average figures in DEIS.

1 (1113) Reduce the generating capacity of the dam based on the number of people who will agree to quit using electricity.

3 (1394) Higher utility rates may have adverse effects on water users with respect to groundwater pumping, which should have been acknowledged in DEIS.

1 (1708) Farmers may be forced to sell to developers, which will increase demand for electricity and could affect wildlife habitat.

22 (0569) Increases in cost will force some farmers out of business.

12 (1388) Consider impact of cost increases on businesses who must cut employment in order to maintain profitability in face of rising operating expenses making us less competitive internationally.

1 (1856) As member of Tri-State Generation & Transmission and 22% Colorado River Storage Project purchaser, these changes will increase power costs, reducing members' abilities to compete in marketplace.

Frequency (I.D. Number) Comment

11 (1418) Increased costs of power could create job losses, will be passed on to consumers, and could lead to further dampening of the entire regional economy.

19 (0554) The effects of increases in power cost hard on areas already economically depressed; many jobs lost to environmental pressures already.

1 (1855) Central Wyoming has annually decreased its electrical demand over past few years with declines in ore mining, processing, and oil extraction, already placing increased rate pressure on residential members.

306 (0492) The effects of increases in the cost of hydropower will be especially hard on people on fixed incomes.

1 (1735) People on Reservation will want more royalties for use of their water if charged more for power.

20 (0201) Changes would cost electrical users millions of dollars to benefit a few river runners: recreationists.

2 (0516) Research in DEIS shows $4 million benefit to recreation and $55 million loss in power revenues. Majority would benefit from flows that allow power production.

1 (1254) DEIS incorporated environmental mitigation measures into the alternatives for operation of Glen Canyon Dam, but no mitigation for the loss of energy has been proposed.

d. Alternatives to Hydropower Generation

9 (0194) EIS's lack of foresight concerning alternative power sources is inexcusable.

7 (0785) We've got to use more imagination (and we are capable of it) to find energy sources that don't harm environment.

13 (0195) The irreplaceable natural wonder of Grand Canyon is being sacrificed for the short-term use of cheaper energy that could in the long run be substituted for by alternate sources.

1 (1378) People advocating change in Glen Canyon Dam operation should provide a good, clean alternative power source and pay for it.

2 (1402) Hydroelectric plants are to be operated as high-output, base-load facilities; permits higher cost and dirtier fuel facilities to operate only during peak-load periods, minimizing economic and environmental cost.

1 (1716) Thermal power generation may be more environmentally damaging and more costly than using available hydro-generation.

4 (1107) Increased power rates will force more citizens in West to turn with including frequency to woodburning stoves. The result will be increased PM10 concentrations.

Frequency (I.D. Number) Comment

153 (0273) Lost generation would have to be replaced by more use of fossil fuels and: or other sources, such as nuclear, that are more expensive, non-renewable and polluting (including effects of mining and transportation).

30,347 (0305) Utilities will buy power from coal plants if generation is reduced at Glen Canyon Dam. That is not "environmental protection."

3 (0196) Statements about the need for more coal fired plants are short-sighted and misleading.

1 (1919) Hydropower may seem cleaner than coal, but it is hardly without consequences.

13 (0269) Wind generated energy could make up for lost hydropower.

2 (1183) FEIS should acknowledge that lost Glen Canyon Dam capacity will also be replaced by accelerated development of wind and demand side management (Marcus).

21 (0268) Solar energy could make up for lost hydropower.

5 (2323) Favor increased production through nuclear power plants.

3 (1108) Special interest environmental groups have succeeded in making nuclear power most expensive source of electrical energy; same groups attacking hydropower.

58 (0197) Encourage energy conservation as a way to make up for lost hydropower.

2 (1439) Energy conservation is not considered as an alternative that could reduce the cost of replacing any peak output foregone as a result of modifying flows.

2 (0542) CRSP power users work hard to conserve energy.

20 (0286) Conservation will follow a change in our priorities to protect the future, rather than use up resources.

1 (1817) Power marketing efforts will erase all conservation gains by year 2000.

1 (1490) Achievements in energy conservation cannot be "assigned" to Glen Canyon Dam, as they would occur regardless of the action taken there.

1 (1584) p. 259: Western does not agree that conservation and renewable energy (C&RE) savings should be considered a direct offset to lost Glen Canyon Dam capacity. C&RE is an ongoing effort that is totally unrelated to the Glen Canyon Dam issue, and savings will be realized independently from outcome of this EIS. As such, these energy resources should not be applied directly to Glen Canyon Dam, and should not be considered substitutions for lost capacity .

1 (0218) You should include a study of electricity storage.

2 (0217) Storage of electricity would solve the problem of peak demand.

Frequency (I.D. Number) Comment

1 (0768) New power plants predicted by EIS should be avoided through demand side management and changes in national energy policy.

1 (1733) If we need to cut the flow of water, then put in more turbines and use the water twice, thus creating twice the power.

2 (1974) "Excess power" from 500 miles radius of dam should be used to pump water from below dam back into Lake Powell to create maximum efficiency of power generation.

e. Analysis of Power Issues in the DEIS

2 (1131) The DEIS underplays the fact that Glen Canyon Dam energy will not be lost under any alternative (Marcus).

2 (1198) The FEIS should resolve any inconsistencies between the Western DEIS and this DEIS (Marcus).

1 (2121) p. 287, 299: It is our contention that all of the hydropower analysis for the MLFFA is inadequate and is not in compliance with NEPA because for every aspect of the hydropower analysis the impacts of endangered fish research flows are categorically excluded. This is reflected in all figures presented in the hydropower impact analysis. This includes marketable capacity, financial impacts, economic costs, and wholesale and retail power rates. Further, as stated above, we feel that it is currently possible to calculate the hydropower impacts of MLFFA with endangered fish research flows by assuming they will be equal to those under SASF. This is appropriate as a real reduction in capacity will occur and the adjustments to that capacity will result in similar if not equivalent impacts with respect to financial and economic costs and power rates.

2 (0676) While most of work done by Power Resource Committee meets professional standards, a few errors affect integrity of report.

1 (1590) p. 285: We suggest that the issue statement for hydropower be improved by adding mention of the value of the power produced, and how it is time-related.

2 (0718) A dispassionate look at hydroelectric power economics will lead to changes and help the environment.

2 (0889) DEIS economic analysis of Preferred Alternative deficient. Problems include cumulative impacts to large utilities of up to $558 million.

4 (0890) DEIS economic analysis is deficient. Does not include cumulative environmental and economic impacts from construction of replacement capacity using non-renewable resources.

2 (1174) DEIS underplays the fact that much of the economic impacts it quantifies are long-term impacts that will not begin to be felt for many years.

1 (1241) Reclamation did not consider in its economic analysis effect of unusable investment made to uprate Glen Canyon Dam generating units.

Frequency (I.D. Number) Comment

1 (2079) pp. 298–302: It is not explained in the section on Power Marketing why different technologies are utilized to replace lost power resources under the different alternatives. For example, under the Moderate Fluctuating Flow Alternative, purchased power, pumped storage, and energy conservation are used. In the Year Round Steady Flow, besides the above additions, combustion turbines and wind generators are added. Also, the amount of replacement capacity from conservation varies between alternatives

1 (2269) p. 287, Column 1, ¶ 3: Indirect power impacts not addressed. Considerable effort expended to develop and display local economic activity generated by recreation users. Estimated direct expenditures of $14.5 million generated $23.1 million in local economic activity. Nothing mentioned about hydropower impacts on local: regional activity. Could be significant. If apply conservative monthly average expenditure of $100 for each of one million power customers in region, then direct annual expenditures would be $1.2 billion. Applying same multiplier of 1.66 (conservative) results in $2.0 billion of local: regional economic activity generated by power users per year. Fact that many of 1 million power customers not only incur direct impacts but rounds of indirect impacts in form of increased costs significant. Local power expenditures are much more significant than local recreation expenditures and should be included in DEIS. (CREDA)

1 (2271) p. 304, Col. 1, ¶ 2: DEIS has failed to fully analyze cumulative economic impacts on power users served by utilities that purchase CRSP power. After estimating changes in wholesale and retail rates, analysis stops. DEIS states: "...retail rate increase would be ... portion of its power from CRSP." This is followed by: "...the effective impact of any rate increase ....may cease production altogether." The DEIS has the responsibility to quantify the economic and social impacts for these utilities, and alert unsuspecting power customers to possible consequences. Impacts to unsuspecting rural communities should also be analyzed.

2 (1190) It is not clear if the economic analysis in the DEIS takes diversity benefits, which are real, into account properly (Marcus).

3 (1209) FEIS should be based on an economic analysis that does not assume one resource plan for a particular utility in one part of the analysis, and a different resource plan in a different part of the analysis (Marcus).

2 (1213) In revised Retail Rate Impact report for FEIS, the changes in rates for end-users should be reported along with the other conclusions (Marcus).

1 (1479) pp. 294–298: Should be clarified that reliable power system operation will be maintained under various Glen Canyon Dam operational regimes. Costs associates with maintaining reliability and their magnitude should have been included in DEIS.

1 (1846) Analysis of costs to power users does not recognize known cost factors.

1 (1470) pp. 286–293: Accurate interpretation by reviewers will require that there be clear explanation of the nexus between estimated costs (economic, financial, wholesale, and retail rates). This is quite a challenge. (National Research Council)

Frequency (I.D. Number) Comment

3 (0594) Costs to power in summary p. 57 should be reported as negative value indicating cost, not benefit.

3 (0489) Statements on cost (few mils: KWH) are misleading: seem questionable.

2 (1208) For technologies experiencing rapid technological progress, such as solar, wind, and demand side management, Power Resources Commission tends to overstate future costs. FEIS should be based on economic analysis that accounts for technological progress over the 50-year period of analysis (Marcus).

3 (0706) Costs in EIS may be overstated because of the way figured.

1 (1130) The DEIS omits alternatives for replacing lost Glen Canyon Dam capacity and consequently overstates costs to small customers tremendously (Marcus).

2 (1423) Present value of substitute generation estimated at 8.5% results in additional lowering, if not understating, of the costs; weaken DEIS and its conclusions.

2 (0551) Costs calculated are annual costs, wholesale costs. These are magnified at retail level and ongoing each year.

1 (1481) pp. 285–302: Source of hydropower cost estimates should be better documented; not clearly identified in DEIS. Documentation for sources other than 1993 Power Resources Commission draft report including revisions of the cost estimates subsequent to preparation of Power Resources Commission database, should have been provided in DEIS to facilitate review.

1 (1847) Insufficient economic data is provided for each alternative on which to base informed analysis of short- and long-term one-time costs, recurring costs, and distribution of costs among the various public utilities.

1 (1880) Summary p. 57: How have the economic costs of Interim Operating Criteria actually affected consumers? The wording of this section makes it clear that there is a tremendous cost of operating the dam to reduce impacts to downstream resources. Costs of up to $116 million per year are twice the revenue brought in by the dam in a low runoff year. What data support these claims?

1 (1482) pp. 285–302: DEIS should have indicated how costs may vary depending upon the actual evolution of factors such as load growth and fuel prices. Power Resources Commission draft report provides detailed sensitivity analyses that could have been summarized. DEIS should have indicated that effects of potential reductions in demand due to operational changes and increased prices were dealt with through sensitivity analysis. (National Research Council)

11 (0591) Power costs are based on 1991 figures, which are changing rapidly.

2 (1045) In power cost estimates, FEIS should account for as much conservation, efficiency, and cost savings as can reasonably be realized in the future under the Preferred Alternative.

Frequency (I.D. Number) Comment

1 (1473) pp. 286–293: Unclear whether all of the cost estimates based upon contract rate of delivery marketing use consistent assumptions. FEIS should indicate what assumptions have been made concerning timing of changes in contract rate of delivery allocations and consistent assumptions should be used in calculating the different types of cost analysis. Explain any differences. (National Research Council)

1 (1472) pp. 286–293: Power Resources Commission draft report indicates that the utility financial and wholesale and retail rate estimates are premised on a contract rate of delivery marketing arrangement. This should be noted in FEIS to facilitate interpretation of relationship between estimates and those for economic costs under contract rate of delivery as in Table IV-28. (National Research Council)

1 (1468) pp. 264–302: There are problems with the manner in which benefits and costs are reported. To facilitate summary comparisons, equivalent annual values of benefits and costs are reported in DEIS. Method used to calculate annual hydropower costs and annual economic and financial costs associated with hydropower appear to yield nominal rather than constant dollars. FEIS should present graphs showing costs in constant 1991 dollars for each year of analysis for the various alternatives (National Research Council).

1 (1471) pp. 286–293: Economic costs are estimated under two different marketing arrangements: (1) hydrology, and (2) contract rate of delivery. Results under two arrangements can differ greatly. FEIS should provide guidance in interpreting these discrepancies. (National Research Council)

1 (1475) pp. 286–293: Unclear to what extent the costs estimated under the various analyses are representing the same overall effects. Retail rates were estimated for small systems only; the economic and financial analysis include large and small systems. DEIS should have provided information about the relative magnitude of effects on large and small systems. (National Research Council)

1 (1474) pp. 286–293: Unclear to what extent the costs estimated under the various analyses are representing the same overall effects. Estimates of wholesale and retail rates may reflect only short-term effects when economic and financial analysis based on 50 year period. (National Research Council)

1 (1476) pp. 286–293: Unclear to what extent the costs estimated under the various analyses are representing the same overall effects. Small systems account for most of the total costs estimated in the economic and financial analyses. This should be pointed out in FEIS to facilitate comparison of the retail rate analyses and to clarify incidence of effects.

1 (1478) pp. 294–298: Financial effects associated with reduced ability to provide emergency assistance from Glen Canyon Dam are quantified in Tables IV-31 and IV-32: Unclear to what extent these costs are additive or comparable to any of those estimated in the various cost analyses (economic, financial, wholesale, and retail rates).

1 (2267) p. 287, Column 1, ¶ 1: Assessment of direct power impacts is incomplete. Only include increased costs required to repay federal investment. Not included impacts are economic costs of less flexibility in Western's system, under utilization of facilities, reduced

Frequency (I.D. Number) Comment

emergency: outage assistance, increased consumption of non-renewable fossil fuel resources, and costs of re-negotiating existing agreements. Same quantity of energy is produced for each alternative, but changing flows result in inefficiencies in production process and increased costs to 3 million power customers. Since increased costs are passed on, overall magnitude of power impacts appropriately viewed through changes in cost to final consumer. Table IV- 28 underestimates true costs. Calculation of values in Table IV-28 is actually an intermediate step in process of estimating final impacts to retail customers (CREDA).

2 (1196) DEIS says that "additional background on project cost replacement can be found in Appendix E." No such additional information is present, and should be in FEIS for each scenario, along with explanation of why this number changes between scenarios.

1 (2353) pp. 285–302: Most of the tables and graphs in this section are in absolute dollars, not percentage increases or decreases. These numbers are out of context and could be very misleading. Where percentage increases are shown (median retail rates) , the marginal cost of the alternatives is shown to be quite small. SASFA has median retail rates only 5% higher than MLFFA and 11% higher than the no action alternative.

1 (2268) p. 287, Column 1, ¶ 1: Positive impacts to recreation activities tabulated in Table IV-20. Changing from NAA to MLFFA results in increase of $3.74 million annually to recreation users or present value of $43.3 million. Present value of direct economic impacts of Preferred Alternative compared to NAA is a gain of $43.3 million in recreation sector versus a cost of $888 million in power sector. Values for direct impacts to power and recreation cannot be compared. Estimated values for direct impacts to power based on results of cost minimization computer models. In making comparisons between recreation and power impacts, must be cognizant of this "apples and oranges" situation where power values reflect only costs. Any comparison using values in DEIS understates actual differences between positive impacts to recreation and negative impacts to power. (CREDA)

1 (1852) DEIS gives improper consideration to treatment of capital costs associated with 50% reduction in generation capacity.

1 (1853) DEIS gives improper consideration to treatment of capital costs associated with impact of requiring utilities to change fuels from falling water to fossil fuel.

1 (1483) pp. 285–302: DEIS does not explain that in some cases (small systems) energy conservation was not considered as an alternative that could reduce the cost of replacing existing Glen Canyon Dam power. Failure to fully consider energy conservation is a weakness in the analysis. (National Research Council)

1 (1477) pp. 286–293: Estimates of economic and financial costs for small systems appear to have been substantially overstated in DEIS due to highly questionable assumption concerning the value of off-peak energy. Extensive analysis would be required to justify assumption in DEIS that additional off-peak energy has no value; DEIS should have presented revised estimates incorporating a value for off-peak energy. Resolve before FEIS. (National Research Council)

Frequency (I.D. Number) Comment

1 (1140) The small systems analysis assumes that small systems that lose Glen Canyon Dam capacity will be forced to buy from a single existing supplier (omits demand side management, self-generation, cheaper suppliers, etc.). This is wrong and leads to over-statement of replacement costs, especially for Utah customers (Marcus).

1 (1134) FEIS should include retail rate numbers that are based on a sales-weighted mean of rate impacts to both large and small customers. This would give a much different picture for all alternatives (Marcus).

1 (1141) FEIS should base its small Western customer retail rate analysis on a revised Retail Rate Impact report that better evaluates the cost of replacement power and takes account of options of using Western as a purchasing agent or building new combustion turbines if auxiliary supplier costs are too high (Marcus).

2 (1178) No retail rate analysis has been done for the 7 "large customers" who use most Colorado River Storage Project energy.

1 (1136) FEIS should extend the EGEAS analysis to provide a better approximation to the retail rate impacts on large customers and on all customers combined weighted for their retail sales.

2 (1179) Data suggests that retail rate increases for households served by large Western customers will be under 2.5%. FEIS should acknowledge that it is less than even corrected figures for households served by small Western customers (Marcus).

1 (1129) DEIS overstates retail rate impacts, which for most households will be far less than the DEIS says (Marcus).

1 (1135) Retail rate information for large users based on Power Resources Institute are upper bound (Marcus).

1 (1133) The Retail Rate Impact report overstates retail rate impacts, represents only rates to small customers, and DEIS figures are not accurately drawn from that report making retail rate numbers in DEIS worthless (Marcus).

1 (1171) DEIS analysis of power impacts and retail rate impacts flawed and misleading. Insist that these errors be redressed in FEIS.

1 (1469) p. 288, 290–320: Documentation on derivation of wholesale and retail rates are difficult to interpret, but wholesale rate data appear to be in terms of nominal rather than constant dollars and retail rates are based on wholesale rates. Annual costs should be recalculated to provide data in constant dollars to allow easier comparison with other costs calculated that way. (National Research Council)

1 (0979) p. 5: Note that the only resource for which impacts are considered outside the immediate river corridor is power: economics.

Frequency (I.D. Number) Comment

1 (2120) p. 287, Paragraph 5: As indicated for other sections in Chapter IV, the boiler-plate exclusion of any consideration of the impact of endangered fish research flows is inappropriate and unacceptable. It is particularly onerous for hydropower. Western will be limited to marketing that capacity which is available under SASFA because endangered fish research flows could be mandated in any given year under short notice. This is contrary to what is stated in this paragraph in the draft that impacts would not be somewhere between MLFFA and SASFA. Capacity under MLFFA with endangered fish research flows will be exactly equal to capacity under SASFA.

2 (1147) DEIS contains gross errors in the analysis of power impacts.

2 (0677) Errors in power impact analysis should be corrected.

2 (1176) Because of the large amount of work already done, Reclamation should be able to resolve most, if not all, of the errors in the impact analysis before FEIS.

7 (0808) Power resources committee did not study Preferred Alternative and DEIS claims that economic impact is somewhere between SASFA and ILFFA can't be correct.

1 (1137) FEIS should show that the average bill increase for three million people served by Western customers will be under 1% in the LFFA and under 3% in the SASFA (Marcus).

1 (1138) Western rate increases will tend to have less of an effect on households served by large customers than on households served by small Western customers (Marcus).

2 (1195) FEIS should provide further discussion of the effects, if any, of integrating the Western Area Upper Colorado and WALM control areas.

3 (1205) FEIS should re-analyze the mix of supply-side alternatives to reduced Glen Canyon Dam capacity to include various types of combined cycles. Such re-analysis is likely to reduce the forecasted cost of replacing any lost Glen Canyon Dam capacity (Marcus).

1 (1905) Assumption that extra capacity cannot be marketed outside region is not reasonable. There is increasing power demand outside region that is not considered in study: should be.

1 (1486) p. 293, 298–302: DEIS presents data on new capacity required under alternatives as well as reduction in available capacity for each modified flow alterative, but data are not calculated on comparable basis. EIS should present data on the amount of new capacity required by both large and small systems, and short-term power purchases should be excluded from the total so that the results will accurately represent the addition of long-term capacity.

1 (1144) DEIS summary claims that changing Glen Canyon Dam operations would require replacement powerplants using coal, oil, or gas. Since no replacement energy—only replacement capacity—would be required, most logical replacements would be resources that supply peaking capacity—typically gas-fired powerplants or demand-side management. Power Resources Institute forecasts no more coal-fired additions by 2010 than under No Action Alternative. Summary should be revised to show that replacement sources are more

Frequency (I.D. Number) Comment

likely to be gas-fired resources with some demand-side management and wind as a likely long-term replacement (Marcus).

2 (1192) What are Western's long-term plans to upgrade or build new transmission systems in western Colorado, and how will they affect the Salt River Project risks described in DEIS?

2 (1191) FEIS should say how Western's participation in Dine Transmission Project in northern Arizona would affect the transmission issues (including Salt River Project risks) discussed in DEIS.

2 (1416) Changes in generation of peaking power at Glen Canyon Dam could cause a major disruption in the transmission grid. Loop flows and system configurations will have to be changed to accommodate addition of other resources at other places. Expense not considered in DEIS.

1 (0593) Power Resources Committee studies are better than most used in DEIS; show significant impact for electric utilities. Must be considered in ROD.

1 (1139) Some large Western customers will incur no costs at all in the near term to replace power, and some will even make money selling replacement capacity for lost Glen Canyon Dam capacity (Marcus).

3 (1182) FEIS should indicate that transfer payments are either a cost or a benefit to individual utilities, depending on whether they are buying or selling (Marcus).

4 (0532) Economic analysis in DEIS balances all impacts. Utilities that get more (bigger percentage of) power from Glen Canyon Dam will have higher impact. Averages are misleading.

1 (1132) The DEIS does not predict what real-world utilities will do in response to Glen Canyon Dam alternatives (Marcus).

2 (0391) The DEIS does not address the effects of replacement generation for SRP estimated at $80 million per year.

1 (0509) Preferred Alternative presents SRP with possible loss of up to 13% of total power resource lease.

9 (0389) The DEIS fails to consider the potential loss (up to 54% of investment) of SRP's use of generation facilities built to fulfill exchange agreement with Reclamation or its effects on Western's customers.

2 (1212) Salt River Project has expressed serious concern over the affects of changes in Glen Canyon Dam operation on their exchange agreement. Such concerns are unfounded and unsupported by Power Resources Commission analysis which Salt River Project had over a year to respond to directly. Exchange analysis shows that while there may be occasional restrictions on Salt River Project's ability to use generation from powerplants it owns in Colorado to meet loads in Arizona, the net economic affects are minor. When some

Frequency (I.D. Number) Comment

corrections to analysis are made, the costs associated with the Exchange Agreement are certain to be less than those contained in the existing Power Resources Commission analysis (Marcus).

1 (1904) Excess: additional capacity in West will be fully utilized in few years to a decade; therefore power benefits foregone are being vastly understated.

2 (1296) Impact of use of existing surpluses must be considered. Total impact of loss of capacity is total of constructing and operating equal amount of new capacity, leaving regional surplus unchanged.

1 (1586) The significance of cutting into existing power surpluses, and time frames now required to bring new generation on line from identification of need to turnkey, not expressed; not clear that using existing "cushion" or factoring in anticipated conservation does not offset lost Glen Canyon Dam capacity. Real impact of action is need for "X" megawatts of new replacement capacity now. Reclamation should recognize and explain that use of existing surpluses also creates impacts.

1 (1142) There is no documentation in the EIS for the use of 10,000 kilowatt hour per year per household. Standard utility practice is to compute typical bill at 500 kwh per month or 6,000 kwh per year. FEIS should reflect these figures.

1 (1913) Convenient thing about using averages is it's easy to hide the important facts.

2 (1210) FEIS should not rely on an analysis that assumes replacement in kind of long-term resource additions.

1 (1899) Use of a 20 year planning horizon inappropriate; 50 years more reasonable for power project on magnitude of 500 megawatts.

2 (1177) FEIS should provide documentation for the three million users, how many retail customers they represent, the 180+ wholesale utility Western customers, and indicate how much energy is used by the "over 3 million people" as a basis for comparison to the 4000+ gigawatt hours supplied by Glen Canyon Dam (Marcus).

3 (1173) Power Resources Commission and Retail Rate Impact reports reflect valiant effort by Reclamation to identify impacts of changes in Glen Canyon Dam operation, but are flawed.

2 (1202) While Power Resources Commission is to be applauded for its efforts at a complex and ambitious analysis, their results are presented awkwardly, conclusions do not seem to match the actions of actual Western customers, and the inputs are out-of-date and in some cases apparently wrong (Marcus).

2 (1215) Retail Rate Impact report assumes lost capacity from Glen Canyon Dam must be replaced in full for each of the six months in which it is lost. This tends to overstate cost of replacement energy. FEIS should correct this error.

Frequency (I.D. Number) Comment

1 (1233) Power Resources Commission errors pointed out shortly after Stone and Webster modeling studies were not corrected (see Environmental Defense Fund, memo 4: 2: 93)

1 (1143) Rate impacts in DEIS based on Retail Rate Impact report are too high. Even without correcting mistakes, the average household bill would increase about $26 in the worst case—not the $69 shown in Summary. FEIS should correct these errors (Marcus).

2 (1197) FEIS should not analyze Colorado-Ute as a Western customer since they went bankrupt in 1990. This change may have major impact on Power Resources Commission analysis.

2 (1214) Primary flaw of Retail Rate Impact is the use of alternative supply prices for Utah that appear much too high and are undocumented. It also ignores the fact that Utah customers could build their own replacement capacity or buy lower priced replacement capacity in the Western U.S. grid (Marcus).

2 (1216) Utah Associated Municipal Power Systems and Utah Municipal Power Agency—two associations of smaller utilities in Utah—are Western's fourth and sixth biggest customers respectively. But since Power Resources Commission did not count them among the seven large customers it studied, Retail Rate Impact counted them as small customers and disaggregated their Western allocations to their various member utilities. This is reasonable, but the same approach should have been used for Plains Electric Generation & Transmission Cooperative as well (Marcus).

1 (1236) Power Resources Commission produced two sets of spreadsheets for small systems analysis; economic impact and financial impact; difference between two not cost but redistribution of wealth. Mistake adds $1 million per year to costs.) (Environmental Defense Fund)

2 (1219) FEIS should resolve apparent discrepancy in total dollar impacts on small customers contained in Retail Rate Impact and Power Resources Commission analysis (Marcus).

2 (1211) Power Resources Commission should explain why changes that do not affect energy deliveries on an annual basis and often not even on a monthly basis would cause construction of baseload facilities to be accelerated (Marcus).

2 (1217) Retail Rate Impact report appendices include partial copies of spreadsheets that seem to have calculation errors. If not due to computational error, further clarification of the spreadsheet column is needed. If due to error(s), they should be corrected (Marcus).

2 (1203) A model is only as good as its inputs, and a review of the hydrology numbers in the Power Resources Commission raises many questions that must be answered before FEIS (Marcus).

2 (1207) The Power Resources Commission report should be revised to reflect the fact that for Tri-State, one effect of Glen Canyon Dam operational changes is to reduce the cost of coal generation by accelerating its acquisition (Marcus).

Frequency (I.D. Number) Comment

2 (1218) Retail Rate Impact does not contain analysis on Preferred Alternative, but DEIS does. Revised Retail Rate Impact report should contain the backup for analysis in DEIS.

2 (1201) Appendix E refers to changes in the forced outage rates of Salt River Project plants, but Power Resources Commission report indicates that there would be no change in actual forced outage rates of Craig, Hayden, and Four Corners coal plants in which Salt River Project owns shares (Marcus).

2 (1175) Modelling in DEIS gets 'A' for effort, but fails to predict what real-world utilities will do in response to alternatives.

1 (1901) Elfin model used to evaluate power benefits is not a true "expansion model" and will not give a "realistic" value of power values; will be understated.

1 (1237) Large systems were correctly modeled in pool sim. but distribution of savings among utilities in pool inconsistent (Environmental Defense Fund memo 4: 2: 93).

1 (1238) Ext. per. used to account for effects associated with cost of new re.; EGEAS make inconsistent assumption that generation pattern doesn't change, but fuels escape at different rates; correct (Environmental Defense Fund).

2 (1206) EGEAS inputs do not allow for the possibility of purchasing peaking capacity that is for sale in the Western U.S. electrical grid at prices per kilowatt year far below those in current EGEAS inputs. FEIS should include a revised EGEAS analysis that reflects this possibility (Marcus).

2 (1204) EGEAS model assumptions about natural gas prices should be updated, and FEIS should closely examine any long-term assumption that fuel prices can diverge sharply in adjacent states for an easily transportable fuel (Marcus).

1 (1234) EGEAS model used coal-fired resource for capacity additions, and Tri-State's preference (purchase of coal plant) is cheaper (Environmental Defense Fund).

1 (1484) p. 287: Statement that Glen Canyon Dam generates electricity without pollution or using non-renewable resources should be modified to state Glen Canyon Dam has "ability to generate electricity without air pollution or using non-renewable fuel resources" because of Glen Canyon Dam effects on terrestrial and other resources that are effectively non-renewable.

1 (1480) p. 295: DEIS states that "system efficiency" would be reduced under fluctuating flow alternatives." This term should be explained in FEIS.

2 (1199) The Environmental Defense Fund model used in the Power Resources Commission analysis is called 'ELFIN'. This model is misnamed in the DEIS.

1 (1671) pp. 54–55: A description or discussion of 'economic benefits' and how it differs from 'power' was not provided. If this description was provided later in the document, then it should be moved forward to allow better evaluation of this table (Table II-7).

Frequency (I.D. Number) Comment

2 (1189) Figures in Table IV-30 do not match the Retail Rate Impact report for some alternatives and are not in fact the medians from the Retail Rate Impact. In every case where the DEIS figures fail to match the Retail Rate Impact figures, the Retail Rate Impact rates are lower.

2 (1187) Wholesale rate figures in Table IV-28 are misleading. FEIS should show the Western revenue requirements for each scenario, and then show both the energy rate and the capacity rate, which would collect those revenue requirements—not a misleading composite. (Comment applies to Figure IV-18.) (Marcus).

2 (1185) The report of annual economic costs in Table IV-28 has several problems that tend to overstate economic costs in early years and understate them in far distant years. FEIS should present levelized numbers in real terms and break them down at least decade by decade (Marcus).

1 (1235) The row titled "retail rates" in Table IV-28 is unclear as to reference to economic or financial impacts; if financial, should be line showing benefit to sellers (Environmental Defense Fund).

2 (1188) It is impossible to tell from Table IV-29 or anywhere else in DEIS what the total costs are for small systems as a group and for large systems as a group (Marcus).

2 (1184) Marketable winter and summer capacity numbers in Table IV-28 do not match data found elsewhere. Appear to be too low for some steady flow scenarios, and because of Colorado River Storage Project modeling deficiencies, were arbitrarily scaled up by an amount that should be disclosed for each alternative (Marcus).

2 (1186) Questions about contract rate of delivery methodology and Power Resources Commission analysis make annual economic cost numbers and annual financial costs and transfer payments listed in Table IV-28 unreliable (Marcus).

3 (1200) Table E-2 (p. E-10) should be amended to clarify that it does not represent allocations in effect on 7: 6: 92, to delete CUEA and include former CUEA allocations under Tri-State and elsewhere as appropriate, to use actual utility names, and to show retail loads served by each customer. As it is now, it is unnecessarily confusing (Marcus).

1 (1485) p. 291: DEIS should have stated clearly whether the financial effects given in Table IV-29 are annual.

3 (1239) DEIS emission information inconsistent and flawed due to modeling flaws; emissions of all power plants should be included and all alternatives modeled for reasonable estimate of price of SO2 emissions (Environmental Defense Fund).

1 (1145) DEIS projects increased emissions under the Preferred Alternative probably due to failure to account for emissions associated with inter-utility transactions. Corrected analysis expected to show decreased emissions in the near term, increased emissions in the 2000–2010 period, and then decreased emissions in the long-term (Marcus).

Frequency (I.D. Number) Comment

2 (1194) FEIS should quantify emissions by sub-area (e.g., by state) and by time period (either annually or every 5–10 years) to support "potential" reductions in near-term emissions (Marcus).

12. Non-use Values - 75 statements dealt with this subject.

a. Inclusion

3 (0689) Encourage expansion of non-use studies.

1 (1396) Unfortunate that non-use values impacts and alternatives discussion was not part of DEIS.

1 (1870) Non-use values information should be incorporated into this EIS or Adaptive Management Program because they will expand the nationwide scope of this EIS.

1 (2347) p. 166, 302: The findings of the full-scale non-use values study must be in the FEIS and must be part of the long-term monitoring and research and Adaptive Management Program.

1 (1644) p. 302: Reports of the pilot test and the non-use value study are to be reported in the FEIS. Because the world-wide prominence of the Grand Canyon has the potential for significant nonuse values, a means of reporting the progress and results of the studies before the FEIS should be employed.

2 (1419) "Non-use value" is too subjective a measurement and should not be used to govern the operation of Glen Canyon Dam.

1 (2109) p. 163: The need for and usefulness of including a discussion on Non-Use Values when those studies are incomplete and without any substantive conclusions is questionable.

1 (1619) p. 165, Non-Use Value for Hydropower: We question including this section in light of the recent focus group sessions (2: 94) where we understand the public had difficulty substantiating value for this resource.

16 (0335) Should be removed from consideration if the non-use value results are not available for comment before FEIS.

2 (0595) Pilot study of non-use values should not be used in ROD.

b. Methodology

19 (0219) Public denied opportunity to evaluate and comment on non-use value economics—a denial of due process. (See 309 CAA) Could change outcome.

2 (0899) Neutral depictions of physical and biological impacts not established; technically defensible non-use values survey cannot be conducted.

Frequency (I.D. Number) Comment

1 (1436) Explanation for the principle and rationale for non-use values in the DEIS is excellent, but it should be accompanied by studies documenting their magnitude.

1 (1618) p. 163, first column, ¶ 2: The wording of the first sentence, "...even if they never visit or use these features" does not include option values, the possible future use of a site.

1 (2270) p. 302, Col. 1, ¶ 3: Non-use value study cannot produce credible now. To estimate non-use value relevant to economic analysis, necessary conditions must be satisfied: 1) Physical and biological relationships must be based on indisputable scientific conclusions. 2) Alternatives and associated impacts must be clearly defined. 3) Non-use value must be obtained through unbiased survey instrument of affected population. Physical and biological relationships not accurately depicted. No clear distinction of impacts between alternatives. Survey procedure is suspect (Madariaga 1987). Non-use value not completed for DEIS; however, results from non-use study planned for inclusion in FEIS. Two problems: 1) technique highly questionable, and 2) values likely insignificant. Inclusion without review and comment is inappropriate. Statement that inclusion could alter results unfounded and contrary to existing data. Correct in FEIS. (CREDA)

1 (0674) Further research on non-use values should be part of Adaptive Management Program and long-term monitoring and research.

4 (0567) There are many questions about how non-use values will be determined that we should have a chance to comment on.

2 (0891) For non-use values technique, how was bias avoided?

3 (0893) For non-use values technique, what is the basis for excluding non-use values for power users?

2 (0895) For non-use values technique, what is the basis for market size?

2 (0898) For non-use values technique, what is being done to assess the non-use value of fossil fuels that would be used for replacement power?

2 (0894) For non-use values technique, how does non-use of power differ from other non-users of local resources?

2 (0892) For non-use values technique, for which resources is it being computed?

2 (0897) For non-use values technique, how are reversible impacts used to prevent skewing of results?

2 (0896) For non-use values technique, what resource impacts are reversible and non-reversible?

Frequency (I.D. Number) Comment

CHAPTER SIX
Statements of Belief, Opinion, or Philosophy That Could or Should Influence Discussion and Decisions of this Process

Frequency (I.D. Number) Comment

1 (0243) I am 100% in favor of Indians.

1. Beliefs about Nature and Mankind's Relationship to Nature - 1,431 statements dealt with this subject.

a. Technology

2 (0247) Technology kills nature and thus people.

1 (0539) We each expect to use things that our modern technology has produced.

b. Grand Canyon and Glen Canyon

36 (0432) The Grand Canyon and Colorado River are places of great importance.

47 (0258) The Grand Canyon is one of the greatest wonders of our world.

194 (0257) The Grand Canyon is a national treasure: sacred place, etc.

10 (0252) Impressed with the number of visitors from overseas who want to share in these God-given treasures.

25 (0249) Grand Canyon National Park and environs should not be compromised.

26 (0254) The Grand Canyon should be considered more important than short-term monetary gain or development.

9 (0623) Because of dam we have lost the natural wonder of: people will never see the Glen Canyon: people will never see.

10 (0684) Loss of Glen Canyon is a tragedy.

172 (0004) Primary concern is to protect: restore the Grand Canyon.

234 (0313) Protect: save the Grand Canyon and its ecosystem.

97 (0251) Help protect the canyon for the future. It's the right thing to do.

2 (0262) Despite the fact that these measures are too little too late, I hope that at least some of the healthy environment of the Grand Canyon can be restored or preserved.

Frequency (I.D. Number) Comment

2 (1970) Use a three stage approach, 1) return river to pre-dam natural state, 2) begin a planned process for orderly phase-out of power generation, 3) begin a draw down of reservoir and return river to free flow.

4 (0250) Please get this one example of man's ability to manage this dam correctly done so that this canyon is preserved for generations to come.

1 (0664) We must teach the public what they can do (conservation, etc.) to preserve the beauty of the canyon.

7 (0521) Science ought to be used to protect Grand Canyon.

115 (0871) Fluctuating flows: erosion preserve nature, the way the river and canyon have been from the beginning.

13 (0870) Steady flows are contrary to historical nature of Grand Canyon and Colorado River; would create a new environment.

15 (0256) Please save the canyon from the money motivated utilities for future generations.

11 (0255) Grand Canyon should be protected from man's progress for profit way of looking at things.

151 (0394) Grand Canyon should not be sacrificed for (peak) power needs: resources.

2 (0773) NPS Organic Act establishes purpose of Grand Canyon National Park. Hydropower is not one of them.

12 (0562) Everyone should pay for saving the Grand Canyon—not just the rural west.

23 (0758) Grand Canyon can't go back to any one thing. It has and always will be changing.

40 (0483) Changes that we make today are minor in the total scheme of things that happen in Grand Canyon and Colorado River. They will continue to evolve. Arrogance to think otherwise.

3 (0253) I agree with Teddy Roosevelt: "We cannot improve it. Leave it alone."

1 (1931) Biological diversity for diversity's sake is not always desireable. A zoo is very diverse, but completely unnatural. The Grand Canyon environment must not be managed as a zoo.

5 (0453) Can't go back to a time when man's influence on Grand Canyon can be erased.

30 (0248) Grand Canyon: Colorado River should remain as created: as close to natural state as possible.

Frequency (I.D. Number) Comment

c. Living in the Southwest

1 (0423) Living in Areas Without Resources Demands Sacrifices.

5 (0244) People choose to live in the desert. Society as a whole, wildlife, and irreplaceable geologic environments should not pay for that choice.

1 (0424) Protection of wildlife and Colorado River is a way to incorporate the true costs of living in the Southwest, where resources are scarce, into the regional economy.

d. Mankind's Use of Resources

3 (0477) God created man and earth, and man shouldn't destroy either one.

2 (0536) God intended man to have dominion over creations, but there will be serious consequences for unwise use.

18 (0599) Man was given dominion over the earth.

1 (0246) I do not believe that man cannot or should not use the river ecosystem, but we must care for it in a sensitive manner.

32 (0245) We must learn to live with nature—not at nature's expense.

28 (0241) Man needs to learn to live within the ecosystem and not be destructive to it. Any further destruction by the actions of man is unconscionable.

7 (0538) If what we want is zero impact, man would have to cease to exist.

2 (0763) Lifestyle is not the most important thing. Have to give up certain things to have a pleasant place to live now and in the future.

2 (0836) Opposed to those who would lock up natural resources for their personal use.

9 (0508) Intent of American public is to balance physical wants, clean renewable energy, and environment.

11 (0726) We must recognize that in order to deal with ecological crisis we must see it as an interconnected system of complete interdependence—a holistic view in harmony with nature.

8 (0239) Sooner or later, developers and utilities need to see that they cannot take as much as they want without being publicly accountable for their policies.

1 (0714) Subsidizing production of surplus crops at the expense of taxpayers and resources is wrong.

Frequency (I.D. Number) Comment

2. Beliefs about Rivers, Dams, and Dam Operation - 60,827 statements dealt with this subject.

a. Rivers

20 (0263) Please take care of the river.

9 (0420) Deeply concerned about misuse and destruction of our national river system.

1 (0050) River not being operated with a systems approach.

1 (0852) Rivers are too valuable to be dominated by any one use.

1 (0738) Manage the river system as a whole—not as a series of reservoirs and power generation facilities.

2 (0790) Once we have a dam there is really no way to restore a river.

1 (1699) For better or worse, the river will always be subject to active management programs.

3 (0850) Cannot approach the river as a wilderness resource. It will always be subject to active management.

1 (0733) Everyone seems to think they have a better use for the Colorado River than the one God intended.

6 (0695) Managing the river to benefit ecosystem will benefit utilities, prevent future losses from endangered species and environmental crisis.

7 (0047) We cannot let money take over management of the Colorado River in the Glen Canyon Area, which has been occurring up to now.

52 (0620) The river is constantly changing regardless of flow control. Good and bad changes (to beaches and species) are only relative to perspective.

2 (0734) Destruction of the Colorado River and its corridor is one of the biggest mistakes Reclamation ever made.

b. Dams

17 (0622) We should have dams on all rivers of sufficient flow to generate electricity.

1 (1916) We can't afford to build the dams now needed, and certainly can't afford the delays in process that double or triple the price tag.

2 (0690) Hope changes in operation of Glen Canyon Dam will carry over to other federal dams to reclaim environmental values and river canyons throughout the West.

2 (0261) Would like to see the same ramping criteria at Davis Dam.

Frequency (I.D. Number) Comment

1 (0700) If NEPA process had been around, we wouldn't have had the dam in the first place.

4 (0240) I don't approve of dams.

2 (0501) Can't redress wrongs of dam builders with another wrong.

6 (0783) Lake and dam are both temporary; will fill up with silt, etc.

20 (0541) Nature will adjust to the changes caused by the dam. Environment will stabilize if man's presence and influence are minimized.

3 (0434) Some would like to return to pre-dam conditions, but most unwilling to give up benefits of dam-created environments.

7 (0433) Pre-dam conditions were not pristine.

3 (0874) Pre-dam conditions typical of flashy river system: extreme high: low flows, extremes in temperature and turbidity caused limited diversity of wildlife and plants and allowed colonization by non-native fish and vegetation.

19 (0435) Return to historic pre-dam conditions is not realistic: none of alternative will do this.

2 (0859) Why weren't environmental concerns addressed before the dam was built?

1 (1761) Reclamation statement that "returning to pre-dam flow patterns would threaten...sediment...[and] rainbow trout fishery" is direct contradiction of DEIS and FWCA.

40 (0030) The fact that the dam exists has changed the whole ecological system of the river.

7 (0328) We have learned to separate out the effects of the existence of Glen Canyon Dam from the way it is operated.

4 (0883) Changes brought by dam were good for some parts of the ecosystem and bad for others.

57 (0478) Glen Canyon Dam has done a lot of good. Look at the positive side of ecosystem impacts: benefited millions for two decades.

6 (0885) Although not all prefer new environment created by dam, increase in riparian habitat, wildlife, recreation, and reduction in non-native warm water fish generally viewed with support.

1 (1793) Most dramatic change brought about by Glen Canyon Dam is higher water volume during seasonal droughts.

24 (0280) Boaters and environmentalists would be worse off if the dam had not been built. Dam allows use of otherwise dangerous, inaccessible region.

Frequency (I.D. Number) Comment

1 (1915) Discomforts of a few fish don't begin to compare with all the benefits dam(s) has brought.

37 (0029) Glen Canyon Dam has hurt more than it has helped: should not have been built.

1 (1425) The existence of the dam has led to a loss of plant nutrients to replenish food supply in Lake Mead.

6 (0045) I favor public involvement in management of the resources of the Colorado River Basin, including the Glen Canyon Dam.

1 (0058) The water inventory behind Glen Canyon Dam is enough that the river system can be managed for the net benefit of all users.

c. Dam Operation

10 (0040) Concerned with the current management of the dam and the rapid fluctuations.

2 (1898) Consider the impact water flows through Grand Canyon would have on environmental conditions such as water quality, aquatic life conditions, wildlife and habitat, air quality, vegetation and soils, and cultural resources.

4 (0035) River fluctuations causing expensive damage to beaches and marinas downstream.

1 (1834) Prior to 1991, water releases from dam were dictated by demand for power.

42 (0043) It seems evident that the generation of electric power at Glen Canyon Dam has taken precedence over the health of the Grand Canyon ecosystem. Even a treasured national monument takes second priority to maximizing profits in the utilities business.

1 (2126) In past, dam operated for maximizing single resource—hydropower. Substituting another management policy with an alternate but equally myopic focus is not a step forward. Only through holistic, ecosystem wide management approach can all resource concerns be balanced.

30 (0854) Limiting output of Grand Canyon power generation is a total breech of trust of public to original proposal, conception, and funding of this facility.

1 (1714) Environmental concerns need consideration in establishing a dam operation plan, but are a minority opinion and should not dominate.

15 (0038) Stick to the recommendations of the scientists regarding releases downstream from Glen Canyon Dam to help protect the precious Grand Canyon resources, including beaches and endangered fish, and to restore the river area downstream.

30,079 (0303) The Bureau should let science determine the flows through the dam, not politics.

30,207 (0304) A few special interest groups should not dictate dam operations.

Frequency (I.D. Number) Comment

2 (0603) Operation of Glen Canyon Dam should be under control of NPS.

1 (1836) Operate the dam in manner that allows NPS to meet objectives of NPS Organic Act.

3 (0673) Philosophy of management of Glen Canyon Dam must be a return to pre-dam conditions as much as possible.

5 (0046) Operation of the dam should not be predicated purely on economics.

1 (1709) The variation of water flow through the dam should be as consistent as possible, while meeting the varying power demands.

1 (2319) Find alternatives to protect the environment other than restricting fluctuating flows.

1 (1859) Proposed changes in operation of this generation resource will be beneficial to rafters, fishermen and some endangered species of fish.

36 (0605) Leave Glen Canyon Dam alone until factors such as environmental impact of coal burning and increased power costs to users are taken into account.

1 (1712) Since amount of water available for use and storage varies annually, dam operations need annual adjustment to conditions.

1 (0857) If my tax money was used to build a facility and the facility was not used to its maximum, I should get a partial refund.

2 (0841) Operate Glen Canyon Dam more like a beaver dam.

3. Beliefs About the EIS Process - 5,193 statements dealt with this subject.

a. Priorities and Objectives

91 (0016) Thank you for the progress you have made in setting Bureau operations on an environmentally responsible course; continue.

13 (0005) Your decisions need to favor the return of the river and associated canyon lands to a healthy ecosystem and: or a reasonable workable solution for all parties.

2 (0946) Concerned for protection of all species of plants and wildlife recognizing first-in-time rights of native species.

1 (0242) Future generations will not have the options that we do now.

6 (0656) Achieving pre-dam conditions (with selective withdrawal and sediment augmentation) should be the goal.

1 (1799) DEIS must know, accept and use: mimic the tools nature used to evolve the system to preserve it.

Frequency (I.D. Number) Comment

6 (0422) Do what is best for Americans and their national parks.

1 (0724) Our mechanistic approach to problem solving is what got us here.

1 (0057) I understand that the status quo has a great pull and is difficult to change.

2 (0771) Is new environmental responsiveness real or just lip service? Are natural resource concerns given equal weight with economic and power resources?

3 (0617) Environmental concerns need to be considered, but throwing the baby out with the bath water is not the answer.

1 (0721) Professionals and laymen should raft down the river to see what's really happening.

154 (0288) Ignore political pressure.

17 (0511) There is now a new ecosystem. It is necessary to manage this man-created ecosystem to highest benefit of most citizens of U.S..

123 (0627) Protect the environment, but take care of human needs first.

238 (0629) It's time the government thinks of the 95% of the people who represent reasonable thought and common sense (i.e., the majority), instead of vocal special interests.

193 (0537) Public officials should always base their decisions on good information and what is best for the majority.

4 (0518) Society that ignores economics, people, industry, and what made them great can't survive long.

42 (0545) Do the rights of the few displace the rights of the many?

106 (0555) People should be as important as fish.

5 (0544) Which should have higher priority: power for 3 million people and recreationists, or non-native fish?

10 (0862) Utah residents are entitled to some priorities because Colorado and Green Rivers meander through the state.

14 (0818) True Preferred Alternative (best process) is one that does the best job of balancing the competing interests and uses of Glen Canyon Dam and Grand Canyon (provides maximum energy that doesn't harm environment). ROD should reflect this balance.

6 (0947) Consideration should be given to operational schemes that recognize all users of resources in the area, including hydropower users.

Frequency (I.D. Number) Comment

11 (0681) Hard-working scientists dedicated to good science have given us much information on which to base Preferred Alternative.

9 (0051) Let the true science set the standards that will allow all users of this resource to work out a solution that will benefit all.

15 (0006) Use the best scientific data available to determine what is best for the river: Grand Canyon rather than be swayed by short-term economic and: or political interests and public opinion.

51 (0385) Support a process based on science that balances environmental and economic effects.

22 (0493) Supported EIS because it was going to be driven by credible science.

3 (0457) Thought science would tell which alternative would be right, but actual credible science has not been addressed.

4 (0548) Science that has been gathered to date is not complete knowledge of best way to operate Glen Canyon Dam to protect resources.

1 (0710) Studies to date too inconclusive to say that resources are winners in this process.

10 (0610) Our current data is not sufficient to make any decision permanent.

4 (0570) Consider scientific fact—not scientific theory. Opinions seem to be changing still on some issues.

1 (0961) Concerns about endangered fish research illustrate need to develop scientifically credible program that will support decision makers and diverse legal response in protection of Grand Canyon resources.

1 (1736) Special interest groups have collectively reduced the American ability to compete for a share of the global market place.

14 (0649) Are we trading economic progress for economic regress, and do we understand what that means?

b. Bias

1 (1257) DEIS tainted by bias making it useless as basis for decisions; proceeds from assumption what is good for recreation is good for environment and what is good for power is bad for same.

4 (0500) Perception, not science, appears to be driving this final decision to a foregone conclusion.

234 (0023) Environmentalists are pushing the idea for selfish purposes.

Frequency (I.D. Number) Comment

6 (0019) Emphasis is put on the private business that is in the canyon.

1 (1760) Standpoint of FWS regarding Seasonally Adjusted Steady Flow Alternative and Run-of-the-River eliminated alternative are purposefully and manipulatively misrepresented in DEIS by Reclamation.

c. Outcome and Decisions (Record of Decision)

1 (0678) EIS should be completed with highest professional standards from all participants. The resources at stake deserve this.

6 (0013) Glad to see Reclamation prioritizing preservation over profit.

6 (0011) Stick with your current proposal, unless scientific evidence in the future indicates that changes would benefit the (riparian portions of the) canyon.

1 (0659) Hope decisions here represent favorable balance of environmental and park restoration with water and energy supplies and set the stage for future programs throughout Colorado basin.

1 (0766) Take information learned in GCES studies and apply basin-wide.

1 (1718) All you intend to do here is have a short-term solution (if you can call it that) to a long-term problem.

18 (0024) There is no honesty.

4 (0025) EIS's always prove that the proposed projects are safe.

7 (0708) The losers in the process (power customers) lose so much more than the winners win. Negative impacts to hydropower dwarf benefits from changing flows.

54 (0479) Concerned that special interests: politics have: will get in the way of what is best (for the region) (in ROD).

8 (0498) Since we hoped true science would drive process, FWS manipulating outcome is disappointing: puts outcome in question.

1 (1734) Southwest Tribes should be encouraged to bring lawsuits against proposed changes in Glen Canyon Dam operation.

13 (0008) The final EIS should provide detailed directions as to how the ecological elements of the Grand Canyon can be restored and protected for generations to come.

17 (0001) Look to the future for a solution. Do not be limited to today's solutions or let any potential solution go uninvestigated.

Frequency (I.D. Number) Comment

1 (1488) EIS should be clear that it is not a long-term resource management plan and identify those activities required in such a plan that would be outside the scope of the EIS and not under control of Reclamation.

1 (1048) Operation of Glen Canyon Dam provides important test of ability to provide protection for the environment and endangered species at the least possible economic cost.

2832 (0308) No significant future experiments such as flooding riparian habitat or radical changes in water releases should be decided on now.

3 (0512) Even if unpopular or politically incorrect, greatest benefit should still be basis for management decisions.

1 (1941) Good outcome for EIS would be for the Grand Canyon to become an endangered fish mecca—a region where extant populations of endangered species are reintroduced and cultured.

4 (0260) Caution Interior Department not to let the solutions for problems at Glen Canyon Dam transfer problems to other area (area below Davis Dam: Fontanelle: Flaming Gorge).

2 (0777) Will this process teach youth that money is the most important thing, or that other things like nature have value?

d. Government Role and Leadership

1 (1407) Preparation of EIS when no new project or operation was proposed was occasioned by significant change in political climate.

21 (0010) Appreciate Reclamation's reevaluation of the dam and its impacts and the opportunity to comment.

38 (0007) The Bureau is on the right track and is making the best decision at this time.

166 (0017) Praise Reclamation for letting science guide their draft recommendation to greatly reduce fluctuating dam releases for peak power generation.

4 (0080) The preferred alternative makes enough sense; the Grand Canyon should not be greatly damaged if it is used.

3 (0014) Glad that economic considerations did not win out over environment, indigenous peoples, wilderness values, and public access.

7 (0384) All parties must have confidence that Reclamation will follow reason and science, not politics, in formulating decisions of the federal government.

94 (0856) Do not feel that the government should be involved in this issue.

16 (0018) This environmental study is a waste of taxpayer money.

Frequency (I.D. Number) Comment

193 (0022) Stop catering to special interest groups and: or wasting money.

9 (0628) The government bureaucrats who back this Glen Canyon Dam fiasco (cutting power generation) must be voted out of office.

1 (0421) Excessive abuse of Colorado River from Colorado to Gulf typifies lack of concern Reclamation shows the environment and ecosystem.

1 (0026) Reclamation stalled this process under pressure from power users until Grand Canyon Protection Act of 1992 forced action. Such bowing to special interest groups is unconscionable where the Grand Canyon is at risk.

1 (1046) Clear intent of Congress when Grand Canyon Protection Act was passed was that downstream environment be protected, but with the minimum possible adverse economic impact. Being ignored by Reclamation.

5 (0719) Why should we trust Reclamation, which for years was arrogant and economically irrational when it comes to water and power.

24 (0487) Reclamation and: or Clinton Administration is in the process of ignoring science.

1 (1106) Inconsistent that Administration that wants to overhaul health care would take action that would force citizens to forego heated homes during inclement weather.

13 (0488) Reclamation and FWS out of control: out of touch with local and even national people.

3 (0502) FWS cheating for their own purposes.

2 (1785) FWS opposition of MLFFA and support for SASFA is an attempt to return Grand Canyon National Park to pre-dam conditions by forcing pre-dam flows.

1 (0027) Reclamation and: or power users should not search for loopholes to thwart the will of Congress and the American people where the Grand Canyon is concerned.

1 (0707) Grand Canyon Protection Act passed because American public demanded protection of Grand Canyon and downstream resources.

1 (0774) Why are preservationist values of Grand Canyon Protection Act and NPS Organic Act being compromised for benefit of consumptive interests?

1 (1408) New national majority should not seek to circumvent those laws that they feel do not reflect their mandate; must follow due process. If Colorado River Storage Project deficient, amend the Act; do not use administrative fiat or judicial ukase to get results.

1 (0725) Law of the river and other statutes can be changed if necessary.

Frequency (I.D. Number) Comment

5 (0476) Nation will rebel against loss of private citizen's rights and economic impact of Endangered Species Act; purpose too singular.

2 (0843) There must be some redress of Endangered Species Act.

16 (0222) Refreshing to see interagency cooperation.

2 (0770) DEIS redefines assessment of environmental implications as cooperative rather than adversarial process, by including native Indian tribes and other representatives of wide range of concerns.

1 (0221) Happy to see Reclamation and Western at negotiating table as a result of public pressure.

7 (0817) Federal agencies should not be free to ignore their public sector advisors, especially with regard to scientific data.

1 (1015) Look forward to continued involvement in NEPA process as you reach ROD.

1 (1737) Keep government and private entities separate.

1 (1849) Suggest further study be conducted by a committee of all legitimately interested parties.

e. Analysis

5 (0948) Must be sure that science and economic information is trustworthy and professionally interpreted to benefit all.

1 (1258) What appears to be positive impact to environment at summary level rests on unsupported assumption at the detailed level. Assumptions favor interests of recreation over power customer.

8 (0020) The impacts being considered are not environmental impacts but chiefly impacts on recreational users.

1 (1968) DEIS should have considered the possible long-term detrimental effects of irrigating and supplying power to the dessert.

1 (0696) EIS should include some consideration of whether providing subsidized power and water for development of the desert is a good thing.

1 (0759) There is no such thing as good and bad science—it's how it's used.

1 (0762) No such thing as neutral science—always influenced by biases of those doing and interpreting the science.

Frequency (I.D. Number) Comment

7 (0055) Glen Canyon EIS has given us the science to control water releases to reduce the adverse impacts without unreasonable loss of power benefits now and in future.

2 (1259) FEIS should not rest on assumption. Where facts unknown, say so; where impacts identical, empirical basis should be given. Focus research where facts are missing.

1 (0780) Even though we may not have scientific proof that resources will improve, we should do our best to fix these problems.

1 (0597) DEIS should have made better use of independent university researchers.

1 (0056) Page Electric Utility fully supported the GCES and were confident that the scientific research would be able to solve some of the many differences on how the Dam should be operated.

f. Alternatives

52 (0003) Support whichever alternative best benefits the Colorado Ecosystem, cultural, and recreational resources of the Grand Canyon.

16 (0461) Best alternative is one that serves the most people and does the most good for everyone.

23 (0002) Support whichever flow best replicates the natural flow of the river.

11 (0318) The MLFFA is critical to the fragile river ecosystem.

1 (1027) MLFFA would significantly reduce adverse impacts on the downstream environment and cultural resources and Native American interests in Glen and Grand Canyons.

g. Public Participation

2 (0507) EIS process a manifestation of the success of Glen Canyon Dam operation: starving people and those struggling to make a living couldn't take the time.

4. Expressions About Comments Made by Others - Sorted in Alphabetical Order - 249 statements dealt with this subject.

a. Support

2 (0834) Support the comments of Arizona Municipal Power Users Association.

1 (1741) Support the comments of Arizona Power Authority.

1 (0835) Support the comments of Arizona Power Pooling Association.

1 (1230) Incorporate by reference comments of Clarkson, et al., in "Management of Discharge, Temperature, and Sediment in Grand Canyon for Native Fishes," March 1994.

Frequency (I.D. Number) Comment

1 (1404) Coordinated comments with Colorado River Board of California and endorse their comments.

103 (0552) We support the comments made by CREDA.

8 (0028) Please pay attention to the requests being made by "Friends of the River" about the plight of the Colorado River and better control and use of the Glen Canyon Dam.

1 (2309) Support all positions taken by the participating Indian Tribes where Tribes are in agreement.

41 (0830) Support the comments of Intermountain Consumer Power Association.

16 (0831) Support the comments of Irrigation and Electrical Districts Association.

1 (1379) Support the comments of Murray City Power.

3 (0832) Support the comments of Plains Electric.

1 (0717) Support comments of Sierra Club, American Rivers, Audubon Society, and Mothers for Clean Waters.

2 (0647) Support the comments of Upper Colorado River Commission.

4 (0833) Support the comments of Wyoming Municipal Power Agency.

1 (1959) Support the comments of the Wyoming Public Service Commission.

1 (1374) Questions and concerns of Wyoming State Engineer's Office and Wyoming Public Service Commission must be resolved in FEIS and ROD.

b. Disagreement

8 (0259) We have no comment at this time.

4 (2324) Disagree with letter sent out by Bountiful City Light & Power.

4 (0264) Comments in the Garkane Highlights were slanted.

34 (1109) Disagree with the letter sent to power users from Intermountain Consumer Power Association.

5 (1110) Letter sent to power users by Intermountain Consumer Power Association is a biased attempt to protect electric companies and their profits.

1 (1917) Comments of Logan Mayor misleading, critically wrong, and blatant misuse of public funds in attempt to politically manipulate an environmental decision-making process.

Frequency (I.D. Number) Comment

5 (1112) Appalled at actions taken by Murray City; suggest you recycle all comment cards.

5. Suggested Word Changes and Corrections (sorted by page reference) - 77 statements dealt with this subject.

1 (1982) p. 3: Include "cultural resources" in the list of resource concerns.

1 (1665) p. 10: The bullet statement in the right hand column "The ecosystem of Glen and Grand Canyons is dynamic and...may be able to reestablish...." is awkwardly worded and seems to place a directed anthropomorphic attribution to ecosystem processes.

1 (0995) p. 46: Edit page 46 to correctly identify the National Register of Historic District at Lee's Ferry and that the Charles H. Spencer Steamboat is a listed property on the National Register of Historic Places.

1 (1600) p. 53, ¶ 1: This should be modified to read: "FWS believes management objectives can best be accomplished under the SASFA during low water years (see attachment 4)."

1 (1602) p. 66, first column, ¶ 3: We suggest replacing "inconsistent sediment input" with "variable sediment input."

1 (2000) p. 69, Column 1, ¶ 2, second sentence: Insert "seasonally" between "in the" and "warm."

1 (1539) p. 83: There are two average river temperatures mentioned that seem to conflict. This can be corrected by inserting the word "when" between the words "August" and "The."

1 (1450) p. 83: Confusion of terms "sediment" and "sand" should be avoided. Use "sediment" for all sizes and "sand" for sediment in the sand size category.

1 (1540) p. 87, second column, ¶ 1: Correct "favorable."

1 (2001) p. 99, Column 1, ¶ 3, third sentence: Insert ratio between "the constriction" and "to about."

1 (1674) p. 103: Regarding life requirement factors listed, all three are common to all fishes of Grand Canyon, although the "presence of competitors and predators" should be reworded to something like "the ability to avoid or minimize competition and predation." Under Aquatic Food Base, releasing water from the hypolimnion does not technically reduce variation in seasonal discharge.

1 (1344) p. 105: Oligochaetes should not be italicized.

1 (2148) p. 105, Column 2, ¶ 2: Last sentence regarding temperature seems out of place here.

1 (1346) p. 108: Tapeates and Bright Angel Creek are cool water streams according to Bill Persons.

Frequency (I.D. Number) Comment

1 (1349) p. 112: Hourly releases for the day 10: 14: 90 dipped to 3,000 cfs from 6:00 am to 5:00 pm.

1 (2015) p. 119, Column 2, last paragraph: "It is reasonable to assume that, as riparian vegetation increased, habitat and wildlife also increased... "The riparian vegetation is the habitat. Revise to read: "...as" riparian vegetation increased, wildlife also "increased..."

1 (1609) p. 121: According to a memorandum (11: 1: 93) from NPS Environmental Protection Specialist in Salt Lake City, a phainopepla nested in the NHWZ in 1993. First paragraph on p. 122 should state that "one species nests primarily in the OHWZ."

1 (1549) p. 126: It is unclear what point is being made by including the parenthetical statement regarding Lake Powell releases here. We suggest it be deleted.

1 (1550) p. 127, second column, ¶ 1: Delete the word "still" from the second sentence. Previous (recent or historic) reproduction has not been documented.

1 (1552) p. 131, ¶ 1, last line: Insert "potential" between "of" and "impact."

2 (1357) p. 140: Paragraph 3 should begin "Janisch (1985) summarized..." and then delete citation of Bishop, et al. (1987).

1 (1554) p. 180, first column, last line: Fix "distribution."

1 (1678) p. 190: In the sentence "erosion would occur...due the large daily...," insert the word "to" between "due" and "the."

1 (2024) p. 195, Column 1, ¶ 5, first sentence, "Other fluctuating flow alternatives": Rewrite this phrase to read "high and moderate fluctuating flow alternatives."

1 (1365) p. 204: The words "in stage" need to be added to the end of the sentence "troughs between waves tend to increase."

1 (1679) p. 204: The words "in stage" should be added to the end of the sentence "troughs between waves tend to increase."

1 (2036) p. 206, Column 1, last paragraph: The first sentence beginning "Angradi (1992)..." should be reworded to remove the double negative. In addition, it is somewhat redundant with the following sentence.

1 (2038) p. 208: The phrase, "...non-native and coolwater fish" implies all non-natives plus coolwater natives. Recommend this phrase be revised to read: "...non-native warmwater and coolwater fish." In addition, it would be appropriate to provide a citation for the following statement: "However, habitat maintenance flows would offset assumed benefits and cause some displacement of individual non-native fish."

1 (1367) p. 209, Col 1, last paragraph, line 5: Change the term "preferred" to "this."

Frequency (I.D. Number) Comment

1 (1631) p. 236: In second sentence the term "sediment augmentation" is used to describe sediment contributed by tributaries. That term was also used to describe an alternative where human-made systems were proposed to augment sediment. To avoid confusion, we suggest replacing the term with "sediment contributed."

1 (1634) p. 240: In the second sentence, "RM33, 1984–85" should be changed to "RM30, 1993" (Valdez, 1994). (FWS)

1 (1011) On p. 242 under "Restricted Fluctuating Flows" in the second sentence, change "prevent" to "limit" as conditions under some of the alternatives will likely be better than under No Action due to the lesser volume of cold water flushing the backwater.

1 (1637) p. 244, second column, ¶ 3: Should read, "As described under MLFF...young-of-year native fishes. The steady high flows in spring might also perform this same function. Flows during moderate and high water years would range from 12,000 to 20,000 cfs [and higher] and fluctuate if monthly volume to be released does not base-load powerplant. Habitat benefits described above during low water years would be considerable....and under which native fishes evolved." (FWS)

1 (2053) p. 244, Column 1, ¶ 2: Insert "original" before "Modified Low Fluctuating..." in the first sentence. Replace "designed" with "redesigned" in the second sentence.

1 (1638) p. 244, second column,last paragraph to 235: Third and last sentence should be replaced with: "During low water years (experimental flows) backwaters and near shore areas would experience only minimal fluctuations during late spring to early fall months,...native fish" and "Limited spawning and even recruitment in mainstem in warm springs and tributary confluences (sources of warm water) may occur when fluctuations are reduced. However, the significance of this to the populations of native fish is not known."

1 (1577) p. 244, "MLFF," ¶ 3: Correct "20,00 cfs."

1 (1639) p. 245: Third paragraph under ILFFA should be modified as follows: "...would improve habitat conditions for humpback chub compared to NAA conditions."

1 (1640) p. 245: Last paragraph, last sentence should read: "However, as under all alternatives, most native fish reproduction in the mainstem would be adversely impacted by cold water temperatures."

1 (1642) p. 247: Under SASFA, last paragraph, last sentence should be replaced with the following: "limited spawning and even recruitment in mainstem in warm springs and tributary confluences (sources of warm water) may occur when flows are steady. However, the significance of this to the populations of native fishes is not known."

1 (1641) p. 247: First column, last paragraph, third sentence should read: "This inundation would reduce the assumed benefits derived from providing backwater habitats in June and July."

Frequency (I.D. Number) Comment

1 (2059) p. 249, Column 1, last paragraph, third sentence: Insert "contemporary and" between the words "have" and "ancestral."

1 (2061) p. 249, Column 2, Summary of Impacts: Cultural Resources: Replace archaeological with the term Cultural Resource throughout this section.

1 (2066) p. 251, Column 2, ¶ 2, last sentence: Replace the term "less" with "slower."

1 (2065) p. 251, Column 1, ¶ 4, first sentence: Change to read "One of the better known traditional cultural properties..." It seems more accurate to say "better known traditional cultural property" rather than the "most visible." Vasey's Paradise is a Hopi Traditional Cultural Properties and it is equally, if not more visible, as the Hopi Salt Mine.

1 (2067) p. 251, Column 2, ¶ 3, first sentence. Change to read "... the most important for cultural resource protection is..."

1 (2068) p. 252, Column 2, ¶ 4, Archaeological Sites that are Traditional Cultural Properties: This paragraph should be moved to after the last paragraph on this page and the heading should be removed

1 (2069) p. 252, Column 2, last paragraph, third sentence: Change to read: "Within this landscape are specific places, ranging from archaeological sites, shrines, mineral collection areas ..."

1 (2073) p. 253, Column 1, ¶ 1, first sentence: Insert "culturally important" in front of "riparian plants and animals."

1 (2072) p. 253, Column 1, ¶ 1, last sentence: Modify to read "... sacred by Indian Tribe" and some resources are vital for the continuation of traditional cultural practices.

1 (2071) p. 253, Column 1, ¶ 1: Change this paragraph to begin with: "Besides the archaeological sites," a number of other traditional cultural ... however, there "are "additional...been revealed "because of their esoteric nature."

1 (2070) p. 253: Modify table title to read "Minimum Number of impacted traditional cultural properties (all of which are archeological sites) under...."

1 (2074) p. 254, Column 1, ¶ 2, first sentence: The term potsherd is not a generally accepted or utilized terminology in American Archaeology when referring to the fragmented remains of prehistoric ceramic vessels. Please change this to the more acceptable terminology: "shards."

1 (2075) p. 254, Column 1, ¶ 2, second sentence: The term "mark" should be replaced with "validate," here and for ILFFA.

1 (2077) p. 257, Column 1, last paragraph, first sentence: Change to read ... "also would likely be less under this alternative because of the greater stability of the system." Delete the final sentence here and for ILFFA.

Frequency (I.D. Number) Comment

1 (2076) p. 257, Column 1, ¶ 3, fifth sentence: Replace "likelihood" with "rate" here and for ILFFA.

1 (2081) p. 305, Column 2, Other Concerns: In the first paragraph, cultural sites should be trust assets.

1 (1647) p. 309: Second column, third full paragraph, last sentence should be modified adding "draft" to FWCA report.

1 (2272) A1, p. 1: The word "changes" in the last sentence is misleading. The GCES has documented present conditions, but changes from historic conditions were not well documented because early data are meager or not available.

1 (1648) A2: The reference in the literature cited on A-20 refers to "MacDonald 1991" not "MacDonald, et al."

1 (1492) Summary p. 8, ¶ 1, under "Adaptive Management": Insert "still" between "uncertainties" and "exist." Insert "recognized" between "the" and "need" in the third line.

1 (1653) Summary p. 13, ¶ 2, second sentence: The cold water mainstem temperature may be preventing establishment of fish species in a variety of ways besides "upstream mitigation." We suggest replacing that phrase with "establishment."

2 (1301) Summary p. 25, p. 75: Use of the word historic referring to past 30 years of dam operation is a poor choice. Stick to pre-dam and post-dam terminology.

1 (1510) Summary p. 36, ¶ 2, last sentence: Insert "annual" between "in" and, "a," strike "a," and change "year" to "years."

2 (1309) Summary p. 37: Statement that "river is forever changed" should be removed: is doubtful.

1 (1511) Summary p. 37, ¶ 3: Add "from the system(.)" to the end of the last sentence. First paragraph, last sentence under "Flows, Sediment, and Downstream Resources": we suggest you replace "exist" with "develop and establish itself."

2 (1311) Summary p. 37: Diatoms are not single celled.

1 (1512) Summary p. 39, last paragraph, last line: Insert "for their species" after "recorded."

1 (1513) Summary p. 40: Consider adding the word "bat" and a picture of same to the picture.

1 (1514) Summary p. 41, ¶ 2, under "Affected Resources": Insert "defined as" between "are" and "releases."

1 (1516) Summary p. 44, Penultimate paragraph, last sentence: Insert "over time" between "steeper" and "under."

Frequency (I.D. Number) Comment

1 (1517) Summary p. 45, ¶ 1, under "Affected Resources": First line, insert "present" between "The" and "aquatic." Fourth/fifth line insert "non-native" between "the" and "Cladophora."

1 (1518) Summary p. 46, Penultimate paragraph before "VEGETATION": Change "Backwaters would be maintained..." to "Backwaters are anticipated to be maintained..."

1 (1520) Summary p. 48: Use of the word "would" in the last line currently has no scientific support.

Frequency (I.D. Number) Comment

APPENDIX 2:

Organizations Represented in Public Hearings and Letters

Alphabetical List of All Organizations and Public Office Holders Represented in the Public Hearings and Letters

AGUILA IRRIGATION DISTRICT
ALASKA CHIN INDIAN COMMUNITY
AMERICAN WHITEWATER ASSOCIATION
AMERICAN FISHERIES SOCIETY, ARIZONA - NEW MEXICO CHAPTER
AMERICAN RIVERS
ANIMAS - LA PLATA WATER CONSERVANCY DISTRICT
ARIZONA LEAGUE OF CONSERVATION VOTERS
ARIZONA MUNICIPAL POWER USERS ASSN
ARIZONA POWER AUTHORITY
ARIZONA POWER POOLING ASSN
ARIZONA RIVER RUNNERS
ARIZONA ELECTRIC POWER COOPERATIVE, INC.
ARIZONA DEPT OF WATER RESOURCES
ARIZONA GAME AND FISH DEPT
ARKANSAS RIVER POWER AUTHORITY
BEAVER CITY CORPORATION
BEAVER CITY
BEAVER DAM PROPERTY OWNERS ASSOCIATION
BOUNTIFUL CITY LIGHT AND POWER
BRIDGER VALLEY ELECTRIC ASSOCIATION
BUCKEYE WATER CONSERVANCY AND DRAINAGE DISTRICT
CALIFORNIA SAVE OUR STREAMS COUNCIL
CANYONEERS
CENTRAL ARIZONA PADDLERS CLUB, INC
CENTRAL ARIZONA WATER CONSERVATION DISTRICT
CITY OF SANTA CLARA , UT
CITY OF COLORADO SPRINGS
CITY OF TRUTH OR CONSEQUENCES
COLORADO RIVER WATER CONSERVATION DISTRICT
COLORADO SPRINGS UTILITIES
COLORADO STATE WATER CONSERVATION BOARD AND DEPARTMENT OF NATURAL RESOURCES
COLORADO WHITEWATER ASSOCIATION
COLORADO RIVER COMMISSION OF NEVADA
COLORADO RIVER ENERGY DISTRIBUTORS ASSOCIATION
COLORADO RIVER BOARD OF CALIFORNIA
COLORADO RIVER FRONT PROPERTY OWNERS ASSOC.
CONGRESSMAN, STATE OF UTAH
CORTARO WATER USERS' ASSOCIATION
COUNCILMAN, FILLMORE CITY
COUNCILMAN, MONROE CITY COUNCIL
COUNCILMAN, MURRAY CITY COUNCIL
COUNCILMAN, SPRINGVILLE CITY CORPORATION
COUNCILMAN, BEAVER CITY CORPORATION
COUNCILMEMBER, TOWN OF LUSK
COUNCILWOMAN, BEAVER CITY CORPORATION

DEPT OF THE ARMY, CORPS OF ENGINEERS, SACRAMENTO
DIXIE ESCALANTE RURAL ELECTRIC ASSOC
ELECTRICAL DISTRICT NO. 4, PINAL COUNTY ARIZONA
ELECTRICAL DISTRICT NO. 6, PINAL COUNTY ARIZONA
ELECTRICAL DISTRICT NO. 5, PINAL COUNTY ARIZONA
ENVIRONMENTAL EXPERIENCES, INC
ENVIRONMENTAL DEFENSE FUND
EPHRAIM CITY POWER BOARD
FARMINGTON ELECTRIC UTILITY SYSTEM
FEDERATION OF FLY FISHERS AND TROUT UNLIMITED, STONEFLY SOCIETY OF SALT LAKE
FIVE COUNTY ASSOCIATION OF GOVERNMENTS
FLOWELL ELECTRIC ASSN, INC
FRIENDS OF THE RIVER
GARKANE POWER ASSN, INC.
GOVERNOR, STATE OF WYOMING
GRAND CANYON TRUST
GRAND CANYON RIVER GUIDES
GREATER GILA BIODIVERSITY PROJECT
HARQUAHALA VALLEY POWER DISTRICT
HIGH COUNTRY RIVER RAFTERS
HOPI TRIBE
HOT SPRINGS RURAL ELECTRIC ASSN
HUALAPAI TRIBAL COUNCIL, WILDLIFE MANAGEMENT DEPT
INTERIOR, BUREAU OF INDIAN AFFAIRS
INTERMOUNTAIN RURAL ELECTRIC ASSN
INTERMOUNTAIN HEALTH CARE, L.D.S. HOSPITAL
INTERMOUNTAIN CONSUMER POWER ASSN
INTERNATIONAL BOUNDARY AND WATER COMMISSION
IRRIGATION AND ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.
KAYSVILLE CITY CORP
KIT CARSON ELECTRIC CORPORATION, INC
LOGAN CITY LIGHT AND POWER
MARICOPA WATER DISTRICT
MAYOR, PROVO CITY
MAYOR, POWELL WYOMING
MAYOR, NEPHI CITY CORPORATION
MAYOR, MURRAY CITY CORPORATION
MAYOR, MT PLEASANT CITY CORPORATION
MAYOR, MORGAN CITY CORPORATION
MAYOR, MONROE CITY
MAYOR, LEHI CITY CORPORATION
MAYOR, BEAVER CITY CORPORATION
MAYOR, CITY OF CODY
MAYOR, SPANISH FORK CITY, UT
MAYOR, TOWN OF LEVAN, UTAH
MAYOR, SPRINGVILLE CITY CORPORATION
MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
MESA ELECTRIC UTILITY

MIDWEST RENEWABLE ENERGY ASSN
MOTHERS FOR CLEAN WATERS
MOUNTAIN VIEW ELECTRIC ASSN, INC
MT WHEELER POWER, INC
MUNICIPAL ENERGY AGENCY OF NEBRASKA
MURRAY CITY POWER
NATIONAL RESEARCH COUNCIL
NATIONAL PARKS AND CONSERVATION ASSOCIATION
NAVAJO TRIBAL UTILITY AUTHORITY
NAVAJO NATION
NEVADA DEPT OF CONSERVATION AND NATURAL RESOURCES
NEVADA DEPT OF ADMINISTRATION
NEW MEXICO INTERSTATE STREAM COMMISSION
NORTHERN RIO ARRIBA ELECTRIC COOP
OUTDOOR ADVENTURE RIVER SPECIALISTS
PAGE ELECTRIC UTILITY
PAYSON WILDLIFE PRESERVE
PEOPLE FOR THE WEST, GRAND CANYON CHAPTER
PLAINS ELECTRIC GENERATION AND TRANSMISSION COOPERATIVE INC.
PLATTE RIVER POWER AUTHORITY
POUDRE VALLEY RURAL ELECTRIC ASSN, INC
POWER OFFICIAL, MONROE CITY
RESOURCES AGENCY OF CALIFORNIA
ROOSEVELT IRRIGATION DISTRICT
SALT RIVER PROJECT
SAN MIGUEL WATER CONSERVANCY DISTRICT
SAN LUIS VALLEY RURAL ELECTRIC COOP, INC
SAN TAN IRRIGATION DISTRICT
SANTA CLARA CITY, UT
SEVIER SCHOOL DISTRICT
SIERRA CLUB SOUTHWEST OFFICE
SIERRA CLUB LEGAL DEFENSE FUND
SIERRA CLUB, SAN FRANCISCO BAY CHAPTER
SIERRA CLUB, PALO VERDE GROUP, GRAND CANYON CHAPTER
SIERRA CLUB, HARVEY BROOME GROUP
SNOW COLLEGE
SOUTH WESTERN WATER CONSERVATION DISTRICT OF COLORADO
SOUTHERN UTAH WILDERNESS ALLIANCE
SPRINGVILLE CITY CORPORATION
STATE SENATOR, UTAH - 17TH DISTRICT
STATE OF UTAH GOVERNOR'S OFFICE OF PLANNING AND BUDGET
STATE OF COLORADO DEPT OF NATURAL RESOURCES
STRAWBERRY ELECTRIC SERVICE DISTRICT
TAXPAYERS FOR THE ANIMAS RIVER
THE OZARK SOCIETY
THOMPSON MICHIE ASSOCIATES, INC
TONOPAH IRRIGATION DISTRICT
TOWN OF LINGLE
TOWN OF THATCHER
TRANSPORTATION, FEDERAL HIGHWAY ADMIN., REGION IX, ARIZONA DIVISION

TRISTATE GENERATION AND TRANSMISSION ASSOCIATION
U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE, PARKER FISHERY
U.S. DEPT OF INTERIOR, NATIONAL PARK SERVICE
U.S. DEPT OF INTERIOR, OFFICE OF THE SECRETARY, OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE
U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE
U.S. DEPT OF HEALTH AND HUMAN SERVICES, PUBLIC HEALTH SERVICE
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX
U.S. BUREAU OF MINES, DENVER
U.S. DEPT OF INTERIOR, BUREAU OF LAND MANAGEMENT
UPPER COLORADO RIVER COMMISSION
US DEPT. OF AGRICULTURE, SOIL CONSERVATION SERVICE, UTAH US DEPT. OF
US DEPT OF UTAH MUNICIPAL POWER AGENCY
VALLEY ELECTRIC ASSN, INC
VALLEY INDUSTRIES
WASHINGTON CITY CHAMBER OF COMMERCE
WASHINGTON COUNTY COMMISSION
WEBER BASIN WATER CONSERVANCY DISTRICT
WELTON - MOHAWK IRRIGATION AND DRAINAGE DISTRICT
WESTERN AREA POWER ADMINISTRATION
WILLAMETTE KAYAK AND CANOE CLUB
WYOMING GAME AND FISH DEPT
WYOMING MUNICIPAL POWER AUTHORITY
WYOMING STATE ENGINEERS OFFICE

APPENDIX 3:

Organizations Represented in Public Hearings and Letters, Listed by Type

Organizations and Public Office Holders Represented in the Public Hearings and Letters, Listed By Type

CITIES, MUNICIPALITIES, TOWNS, COUNTIES, ETC.

BEAVER CITY
BEAVER CITY CORPORATION
CITY OF COLORADO SPRINGS
CITY OF SANTA CLARA , UT
CITY OF TRUTH OR CONSEQUENCES
FIVE COUNTY ASSOCIATION OF GOVERNMENTS
KAYSVILLE CITY CORP
SANTA CLARA CITY, UT
SPRINGVILLE CITY CORPORATION
TOWN OF LINGLE
TOWN OF THATCHER
WASHINGTON CITY CHAMBER OF COMMERCE
WASHINGTON COUNTY COMMISSION

ELECTED OFFICIALS

CONGRESSMAN, STATE OF UTAH
COUNCILMAN, MURRAY CITY COUNCIL
COUNCILMAN, SPRINGVILLE CITY CORPORATION
COUNCILMAN, MONROE CITY COUNCIL
COUNCILMAN, FILLMORE CITY
COUNCILMAN, BEAVER CITY CORPORATION
COUNCILMEMBER, TOWN OF LUSK
COUNCILWOMAN, BEAVER CITY CORPORATION
GOVERNOR, STATE OF WYOMING
MAYOR, MT PLEASANT CITY CORPORATION
MAYOR, MURRAY CITY CORPORATION
MAYOR, SPRINGVILLE CITY CORPORATION
MAYOR, TOWN OF LEVAN, UTAH
MAYOR, BEAVER CITY CORPORATION
MAYOR, CITY OF CODY
MAYOR, LEHI CITY CORPORATION
MAYOR, MONROE CITY
MAYOR, PROVO CITY
MAYOR, SPANISH FORK CITY, UT
MAYOR, NEPHI CITY CORPORATION
MAYOR, POWELL WYOMING
MAYOR, MORGAN CITY CORPORATION
POWER OFFICIAL, MONROE CITY
STATE SENATOR, UTAH - 17TH DISTRICT

FEDERAL AGENCIES

DEPT OF THE ARMY, CORPS OF ENGINEERS, SACRAMENTO
NATIONAL RESEARCH COUNCIL
U.S. BUREAU OF MINES, DENVER
U.S. DEPT OF HEALTH AND HUMAN SERVICES, PUBLIC HEALTH SERVICE
U.S. DEPT OF INTERIOR, BUREAU OF LAND MANAGEMENT
U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE
U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE, PARKER FISHERY
U.S. DEPT OF INTERIOR, NATIONAL PARK SERVICE
U.S. DEPT OF INTERIOR, OFFICE OF THE SECRETARY, OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX
US DEPT OF INTERIOR, BUREAU OF INDIAN AFFAIRS
US DEPT. OF AGRICULTURE, SOIL CONSERVATION SERVICE, UTAH
US DEPT. OF TRANSPORTATION, FEDERAL HIGHWAY ADMIN., REGION IX, ARIZONA DIVISION

INDIAN TRIBES

ALASKA CHIN INDIAN COMMUNITY
HOPI TRIBE
HUALAPAI TRIBAL COUNCIL, WILDLIFE MANAGEMENT DEPT
NAVAJO NATION
NAVAJO TRIBAL UTILITY AUTHORITY

OTHER

AMERICAN FISHERIES SOCIETY, ARIZONA - NEW MEXICO CHAPTER
AMERICAN RIVERS
AMERICAN WHITEWATER ASSOCIATION
ARIZONA LEAGUE OF CONSERVATION VOTERS
ARIZONA RIVER RUNNERS
BEAVER DAM PROPERTY OWNERS ASSOCIATION
CALIFORNIA SAVE OUR STREAMS COUNCIL
CANYONEERS
CENTRAL ARIZONA PADDLERS CLUB, INC
COLORADO RIVER FRONT PROPERTY OWNERS ASSOC.
COLORADO WHITEWATER ASSOCIATION
ENVIRONMENTAL DEFENSE FUND
ENVIRONMENTAL EXPERIENCES, INC
FEDERATION OF FLY FISHERS AND TROUT UNLIMITED, STONEFLY SOCIETY OF SALT LAKE
FRIENDS OF THE RIVER
GRAND CANYON RIVER GUIDES
GRAND CANYON TRUST
GREATER GILA BIODIVERSITY PROJECT
HIGH COUNTRY RIVER RAFTERS

INTERMOUNTAIN HEALTH CARE, L.D.S. HOSPITAL
MOTHERS FOR CLEAN WATERS
NATIONAL PARKS AND CONSERVATION ASSOCIATION
OUTDOOR ADVENTURE RIVER SPECIALISTS
PAYSON WILDLIFE PRESERVE
PEOPLE FOR THE WEST, GRAND CANYON CHAPTER
SEVIER SCHOOL DISTRICT
SIERRA CLUB LEGAL DEFENSE FUND
SIERRA CLUB SOUTHWEST OFFICE
SIERRA CLUB, HARVEY BROOME GROUP
SIERRA CLUB, PALO VERDE GROUP, GRAND CANYON CHAPTER
SIERRA CLUB, SAN FRANCISCO BAY CHAPTER
SNOW COLLEGE
SOUTHERN UTAH WILDERNESS ALLIANCE
TAXPAYERS FOR THE ANIMAS RIVER
THE OZARK SOCIETY
THOMPSON MICHIE ASSOCIATES, INC
VALLEY INDUSTRIES
WILLAMETTE KAYAK AND CANOE CLUB

POWER SUPPLIERS, UTILITIES, POWER SUPPLIERS AND USERS ASSOCIATIONS, ETC.

ARIZONA ELECTRIC POWER COOPERATIVE, INC.
ARIZONA MUNICIPAL POWER USERS ASSN
ARIZONA POWER AUTHORITY
ARIZONA POWER POOLING ASSN
ARKANSAS RIVER POWER AUTHORITY
BOUNTIFUL CITY LIGHT AND POWER
BRIDGER VALLEY ELECTRIC ASSOCIATION
COLORADO SPRINGS UTILITIES
COLORADO RIVER ENERGY DISTRIBUTORS ASSOCIATION (CREDA)
DIXIE ESCALANTE RURAL ELECTRIC ASSOC
ELECTRICAL DISTRICT NO. 4, PINAL COUNTY ARIZONA
ELECTRICAL DISTRICT NO. 5, PINAL COUNTY ARIZONA
ELECTRICAL DISTRICT NO. 6, PINAL COUNTY ARIZONA
EPHRAIM CITY POWER BOARD
FARMINGTON ELECTRIC UTILITY SYSTEM
FLOWELL ELECTRIC ASSN, INC
GARKANE POWER ASSN, INC.
HARQUAHALA VALLEY POWER DISTRICT
HOT SPRINGS RURAL ELECTRIC ASSN
INTERMOUNTAIN CONSUMER POWER ASSN
INTERMOUNTAIN RURAL ELECTRIC ASSN
JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.
KIT CARSON ELECTRIC CORPORATION, INC
LOGAN CITY LIGHT AND POWER
MESA ELECTRIC UTILITY
MIDWEST RENEWABLE ENERGY ASSN

MOUNTAIN VIEW ELECTRIC ASSN, INC
MT WHEELER POWER, INC
MUNICIPAL ENERGY AGENCY OF NEBRASKA
MURRAY CITY POWER
NORTHERN RIO ARRIBA ELECTRIC COOP
PAGE ELECTRIC UTILITY
PLAINS ELECTRIC GENERATION AND TRANSMISSION COOPERATIVE INC.
PLATTE RIVER POWER AUTHORITY
POUDRE VALLEY RURAL ELECTRIC ASSN, INC
SALT RIVER PROJECT
SAN LUIS VALLEY RURAL ELECTRIC COOP, INC
STRAWBERRY ELECTRIC SERVICE DISTRICT
TRISTATE GENERATION AND TRANSMISSION ASSOCIATION
UTAH MUNICIPAL POWER AGENCY
VALLEY ELECTRIC ASSN, INC
WESTERN AREA POWER ADMINISTRATION
WYOMING MUNICIPAL POWER AUTHORITY

POWER AND WATER ASSOCIATION

IRRIGATION AND ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA

STATE AGENCIES

ARIZONA DEPT OF WATER RESOURCES
ARIZONA GAME AND FISH DEPT
COLORADO RIVER BOARD OF CALIFORNIA
COLORADO RIVER COMMISSION OF NEVADA
COLORADO STATE WATER CONSERVATION BOARD AND DEPARTMENT OF NATURAL RESOURCES
NEVADA DEPT OF ADMINISTRATION
NEVADA DEPT OF CONSERVATION AND NATURAL RESOURCES
NEW MEXICO INTERSTATE STREAM COMMISSION
RESOURCES AGENCY OF CALIFORNIA
STATE OF COLORADO DEPT OF NATURAL RESOURCES
STATE OF UTAH GOVERNOR'S OFFICE OF PLANNING AND BUDGET
WYOMING GAME AND FISH DEPT
WYOMING STATE ENGINEERS OFFICE

WATER AND IRRIGATION BOARDS, DISTRICTS, ASSOCIATIONS ETC.

AGUILA IRRIGATION DISTRICT
ANIMAS - LA PLATA WATER CONSERVANCY DISTRICT
BUCKEYE WATER CONSERVANCY AND DRAINAGE DISTRICT
CENTRAL ARIZONA WATER CONSERVATION DISTRICT
COLORADO RIVER WATER CONSERVATION DISTRICT
CORTARO WATER USERS' ASSOCIATION

INTERNATIONAL BOUNDARY AND WATER COMMISSION
MARICOPA WATER DISTRICT
MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
ROOSEVELT IRRIGATION DISTRICT
SAN TAN IRRIGATION DISTRICT
SAN MIGUEL WATER CONSERVANCY DISTRICT
SOUTH WESTERN WATER CONSERVATION DISTRICT OF COLORADO
TONOPAH IRRIGATION DISTRICT
UPPER COLORADO RIVER COMMISSION
WEBER BASIN WATER CONSERVANCY DISTRICT
WELTON - MOHAWK IRRIGATION AND DRAINAGE DISTRICT

APPENDIX 4:

Overview of the Public Hearings

Overview of the Public Hearings

Number of Individuals Who Gave Oral Comments at Public Hearings, by State of Residence and Location of Public Hearing

Speaker's State of Residence	Meeting Location							TOTAL	
	Los Angeles	San Francisco	Phoenix	Flagstaff	Salt Lake	Denver	D.C.		
Arizona	2	1	16	15	1	1	1	37	27.21%
California	9	25						34	25.00%
Colorado				1		15	1	17	12.50%
Dist of Columbia							5	5	3.68%
Maryland							1	1	0.74%
Michigan						2		2	1.47%
New Mexico		1						1	0.74%
Nevada		1			3			4	2.94%
Utah			1		28		1	30	22.06%
Wyoming						3		3	2.21%
									0.00%
Unknown					1		1	2	1.47%
TOTAL	11	28	17	16	33	21	10	136	100.00%
	8.09%	20.59%	12.50%	11.76%	24.26%	15.44%	7.35%	100.00%	

Speakers at Public Hearings, by Location

Los Angeles
Richard Angelos
Patricia A. Foltyn
Dick Hingson
Tom Huntington
Rick Norman
David Onstad
Barbara Ristow
James B. Schoedler
Darrell E. Smith
A.G. Soderlund
Norm Takusaeawn

San Francisco
Don Bartlett
Alistair Bleifuss
Charles Bonny
Alan Carlton
Ann Cassidy
James Catlin
Walter Cook
Alan Crockett
Nancy Dagle
David Dawdy
Tim Dawson
Robert Dhondt
Larry E. Dobbs
Tim Duane
Nina H. Eloesser
Robert Feraru
Walter Garms
John W. Gray
Bruce Hamilton
David R. Hiller
Vicky Hoover
Leslie James
Tom Martens
Patty McCleary
Steve Miller
Spreak Rosekrans
Rex Sanders
Teresa Schilling

Phoenix
Jane Bird
Carolina Butler
Michael A. Curtis
Richard Dillon
Chris Gehlker
Bobbie Holaday
Leslie James

Phoenix (continued)
Robert S. Lynch
Jim McCarthy
Gail Peters
Paul Piduesan
Anita Rochelle
Rob Smith
Tom Vail
Frank Welsh
Bob Witzeman

Flaggstaff
Michael Black
Roger Clark
Michael A. Curtis
Daniel H. Dierker
Brad Dimock
William Ross Hardwick
Leonard Holt
Leslie James
Bob Lippman
Robert S. Lynch
Angus McIntosh
David Onstad
Robert Ott
Kent Romney
Thomas L. Slaback
Nina Swidler

Salt Lake
Carl R. Albrecht
Jason D. Barnes
Tyler Barton
Sarah Bates
Ed Baumgarten
Vaun Bethers
Leon Bowler
Mike Brown
Wayne E. Cook
Rod Greenough
Paul R. Grimshaw
Rick Hafen
Michael Jensen
Kolbe Klindt
LaDel Laub
Normand D. Laub
Lawson LeGate
Jim J. Lewis
Dick Lucy
Dayne A. Mathis
Muriel C. Mathis

Salt Lake (Continued)
Rod McKenzie
Carolyn S. McNeil
Clifford Michaelis
John Mohlman
Ken Nicoll
R.K. Nielsen
Kirt Nilsson
Leon Pexton
Rob Pitagora
Ted Rampton
Kenneth Sizemore
Darrell E. Smith

Denver
Dawn Adams
John Allum
Senator Don Ament
Tina Arapkiles
Jerry Demel
James Henderson
Jim Heumann
Bill Hugenberg
Gene Jencsok
Christine Kapen
Duane Kelly
Daniel Luecke
Richard Marston
Kevin McNamara
Sherry Olsen
John Olson
John Shields
Darrell E. Smith
Peter G. Ungerman

Washington D.C.
Cliff Barrett
Richard J. Bowers
Julie Gale
Kathryn Holman
Coretta Jackson
Robert S. Lynch
James D. Ogsbury
Dale Pontius
Peter G. Ungerman

Speakers at Public Hearings Who Represented Organizations

Carl R.	Albrecht	GARKANE POWER ASSOCIATION
John	Allum	PLATTE RIVER POWER AUTHORITY
Richard	Angelos	COLORADO RIVER BOARD OF CALIFORNIA
Tina	Arapkiles	SIERRA CLUB
Jason D.	Barnes	DIXIE ESCALANTE RURAL ELECTRIC ASSOC.
Cliff	Barrett	COLORADO RIVER ENERGY DISTRIBUTORS ASSOC.
Sarah	Bates	GRAND CANYON TRUST
Ed	Baumgarten	DIXIE ESCALANTE RURAL ELECTRIC ASSOC.
Vaun	Bethers	LOGAN CITY LIGHT AND POWER
Jane	Bird	UPPER COLORADO RIVER COMMISSION
Michael	Black	TAXPAYERS FOR THE ANIMAS RIVER
Richard J.	Bowers	AMERICAN WHITEWATER
Leon	Bowler	DIXIE ESCALANTE RURAL ELECTRIC ASSOC.
Mike	Brown	DIXIE ESCALANTE RURAL ELECTRIC ASSOC.
James	Catlin	SIERRA CLUB
Roger	Clark	GRAND CANYON TRUST
Wayne E.	Cook	UPPER COLORADO RIVER COMMISSION
Michael A.	Curtis	ARIZONA MUNICPAL POWER USERS ASSOC.
Nancy	Dagle	SIERRA CLUB
Jerry	Demel	TRI STATE GENERATION AND TRANSMISSION
Brad	Dimock	GRAND CANYON RIVER GUIDES
Larry E.	Dobbs	COLORADO RIVER ENERGY DISTRIBUTORS ASSOC.
Julie	Gale	GRAND CANYON TRUST
Chris	Gehlker	CENTRAL ARIZONA WATER CONSERVATION DISTRICT
Rod	Greenough	NATIONAL PARKS AND CONSERVATION ASSN
Rick	Hafen	SANTA CLARA CITY, UTAH
Bruce	Hamilton	SIERRA CLUB
James	Henderson	ARKANSAS RIVER POWER AUTHORITY
Jim	Heumann	HIGH COUNTRY RIVER RAFTERS
Dick	Hingson	SIERRA CLUB, ANGELES CHAPTER
Kathryn	Holman	SIERRA CLUB
Vicky	Hoover	SIERRA CLUB
Tom	Huntington	ENVIRONMENTAL DEFENSE FUND
Coretta	Jackson	HUALAPAI TRIBE
Leslie	James	SALT RIVER PROJECT
Gene	Jencsok	COLORADO WATER CONSERVATION BOARD
Christine	Kapen	PLATTE RIVER POWER
Jim J.	Lewis	MT. WHEELER POWER
Dick	Lucy	UTAH MUNICIPAL POWER AGENCY
Daniel	Luecke	ENVIRONMENTAL DEFENSE FUND
Robert S.	Lynch	COLORADO RIVER ENERGY DISTRIBUTORS ASSOC.
Tom	Martens	FRIENDS OF THE RIVER
Muriel C.	Mathis	MONROE CITY
Angus	McIntosh	PEOPLE FOR THE WEST
Rod	McKenzie	MT. WHEELER POWER
Carolyn S.	McNeil	INTERMOUNTAIN CONSUMER POWER ASSOCIATION
Clifford	Michaelis	BOUNTIFUL CITY LIGHT AND POWER
John	Mohlman	MURRAY CITY POWER DEPT.
R.K.	Nielsen	MONROE CITY
Kirt	Nilsson	MONROE CITY
James D.	Ogsbury	SALT RIVER PROJECT

David	Onstad	ARIZONA POWER AUTHORITY
Robert	Ott	PAGE ELECTRIC UTILITY
Gail	Peters	AMERICAN RIVERS
Leon	Pexton	UTAH MUNICIPAL POWER AGENCY
Dale	Pontius	AMERICAN RIVERS
Ted	Rampton	COLORADO RIVER ENERGY DISTRIBUTORS ASSOC.
Anita	Rochelle	MOTHERS FOR CLEAN WATER
Kent	Romney	PAGE ELECTRIC UTILITY
John	Shields	STATE OF WYOMING, GOVERNOR
Kenneth	Sizemore	FIVE COUNTY ASSOCIATION OF GOVERNMENTS
Darrell E.	Smith	SALT RIVER PROJECT
Rob	Smith	SIERRA CLUB
Peter G.	Ungerman	TRI STATE GENERATION AND TRANSMISSION

Speakers at Public Hearings Who Spoke on Their Own Behalf

Dawn	Adams
Senator Don	Ament
Don	Bartlett
Tyler	Barton
Alistair	Bleifuss
Charles	Bonny
Carolina	Butler
Alan	Carlton
Ann	Cassidy
Walter	Cook
Alan	Crockett
David	Dawdy
Tim	Dawson
Robert	Dhondt
Daniel H.	Dierker
Richard	Dillon
Tim	Duane
Nina H.	Eloesser
Robert	Feraru
Patricia A.	Foltyn
Walter	Garms
John W.	Gray
Paul R.	Grimshaw
William Ross	Hardwick
David R.	Hiller
Bobbie	Holaday
Leonard	Holt
Bill	Hugenberg
Michael	Jensen
Duane	Kelly
Kolbe	Klindt
LaDel	Laub
Normand D.	Laub
Lawson	LeGate
Bob	Lippman
Richard	Marsden
Dayne A.	Mathis
Jim	McCarthy
Patty	McCleary
Kevin	McNamara
Steve	Miller
Ken	Nicoll
Rick	Norman
Sherry	Olsen
John	Olson
Paul	Piduesan
Rob	Pitagora
Barbara	Ristow
Spreak	Rosekrans
Rex	Sanders
Teresa	Schilling
James B.	Schoedler
Thomas L.	Slaback
A.G.	Soderlund
Nina	Swidler
Norm	Takusaeawn
Tom	Vail
Frank	Welsh
Bob	Witzeman

Organizations That Made Presentations, by Location of Public Hearing

	Los Angeles	San Francisco	Phoenix	Flaggstaff	Salt Lake	Denver	Wash DC	TOTAL
American Rivers			X				X	2
American Whitewater							X	1
Arkansas River Power Authority						X		1
Arizona Municipal Power Users Assoc.			X	X				2
Arizona Power Authority	X			X				2
Bountiful City Light and Power					X			1
Central Arizona Water Conservation District			X					1
Colorado Water Conservation Board						X		1
Colorado River Board of California	X							1
Colorado River Energy Distributors Assoc.		X	X	X	X		X	5
Dixie Escalante Rural Electric Assoc.					X			1
Environmental Defense Fund	X					X		2
Five County Association of Governments					X			1
Friends of the River		X						1
Garkane Power Association, Inc.					X			1
Grand Canyon River Guides				X				1
Grand Canyon Trust				X	X		X	3
High Country River Rafters						X		1
Hualapai Tribe							X	1
Intermountain Consumer Power Association					X			1
Logan City Light and Power					X			1
Monroe City					X			1
Mothers for Clean Water			X					1
Mt. Wheeler Power					X			1
Murray City Power Dept.					X			1
National Parks and Conservation Assoc.					X			1
Page Electric Utility				X				1
People for the West				X				1
Platte River Power Authority						X		1
Salt River Project	X	X	X	X	X	X	X	7
Santa Clara City, Utah					X			1
Sierra Club		X	X			X	X	4
Sierra Club, Angeles Chapter	X							1
Governor, State of Wyoming						X		1
Taxpayers for the Animas River				X				1
Tri State Generation & Transmission Assoc.						X	X	2
Upper Colorado River Commission			X		X			2
Utah Municipal Power Agency					X			1
TOTAL	5	4	8	9	16	9	8	59

Note: A "X" indicates that this organization made at least one presentation at the public hearing.

Frequency of Oral Comments Made at Public Hearings, Listed by Database Identification Number

Frequency ***(I.D. Number)***

1. Comments about the adequacy of the process and document not keyed to one specific alternative or resource.
   a. Process Adequacy 69
      i. General
         12 (0009)
      ii. Leadership
      iii. Cooperation
         3 (0757)
         1 (0764)
         1 (0789)
      iv. Scope
         1 (0720)
         1 (0458)
      v. Analysis
         1 (0566)
         1 (0565)
      vi. Alternatives
      vii. Public comment
         4 (0309)
         2 (0310)
         3 (0334)
         7 (0807)
         2 (0465)
         1 (0561)
         1 (0732)
      viii. Legal mandates that have influence on the FEIS and ROD.
         2 (0547)
         1 (0059)
         1 (0553)
         4 (0376)
         7 (0381)
         5 (0809)
         1 (0741)
         1 (0577)
         3 (0744)
         2 (0586)
         1 (0822)
   b. Document Adequacy 0
      i. Tone
      ii. Content
      iii. Format/Layout
      iv. Other
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Frequency ***(I.D. Number)***

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         6 (0370)
         1 (0455)
         1 (0849)
         2 (0510)
         1 (0048)
         1 (0735)
      ii. Dam operation
         7 (0042)
         1 (0037)
         2 (0842)
         1 (0781)
         1 (0782)
         10 (0031)
         2 (0519)
         1 (0052)
         4 (0329)
         1 (0157)
         1 (0653)
      iii. Legal issues affecting dam operation and the alternatives.
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         5 (0044)
         1 (0573)
         3 (0582)
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11 (0352)
8 (0345)
1 (0067)
1 (0641)
11 (0494)
2 (0464)
6 (0378)
8 (0375)
15 (0392)
1 (0525)
1 (0698)
1 (0648)
iv. Support and reasons for support
1 (0728)
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2 (0083)
1 (0769)
2 (0082)
1 (0408)
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iii. Oppose and reasons for opposition
1 (0665)
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6 (0365)
1 (0359)
1 (0635)
2 (0755)
ii. Definition and organization of AMP
1 (0778)

Frequency	*(I.D. Number)*
6	(0111)
1	(0823)
16	(0129)
4	(0482)
23	(0469)
6	(0367)
3	(0638)
1	(0637)
14	(0331)
1	(0786)
5	(0120)
5	(0316)
4	(0428)
1	(0592)
4	(0314)
1	(0472)
3	(0672)
1	(0366)
2	(0396)
6	(0470)
7	(0113)
6	(0124)
10	(0285)
1	(0315)
1	(0513)
1	(0128)
8	(0294)
5	(0816)
2	(0666)
3	(0123)
2	(0576)
1	(0471)
3	(0114)
7	(0118)
19	(0395)
1	(0419)
1	(0117)
1	(0473)
9	(0387)
2	(0669)
1	(0484)
2	(0668)
1	(0705)
4	(0667)

iii. Definition and organization of LTM&R

3	(0311)
3	(0225)
2	(0238)
1	(0368)
4	(0652)
3	(0749)
1	(0731)
3	(0750)
1	(0283)
1	(0825)
2	(0754)
3	(0753)
1	(0687)
6	(0231)
1	(0230)
1	(0411)
1	(0775)
11	(0227)
1	(0228)
1	(0661)
4	(0756)
3	(0752)
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1 (0514)

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1 (0658)
6 (0148)
2 (0151)
1 (0152)
1 (0149)
1 (0662)
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1 (0671)
1 (0159)
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1 (0452)
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iii. Nonnative Fish issues
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2 (0442)
1 (0450)
1 (0167)
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1	(0436)
5	(0361)
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	v. Marshes and marsh vegetation
1	(0447)
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1	(0529)
7	(0377)
1	(0530)
1	(0449)
1	(0444)
1	(0439)
	iii. Protection of endangered species
1	(0839)
1	(0779)
7	(0181)
4	(0356)
1	(0712)
9	(0386)
11	(0358)
1	(0650)
2	(0682)
2	(0506)
9	(0333)
11	(0357)
1	(0491/ 1698)
5	(0813)
1	(0819)
8	(0844)
6	(0354)
6	(0348)
3	(0355)
2	(0388)
7	(0351)
10	(0349)
1	(0403)
3	(0745)
9	(0350)
5	(0347)
1	(0454)
10	(0459)
3	(0474)
4	(0344)
3	(0820)
3	(0634)
1	(0186)
2	(0688)
1	(0704)
1	(0821)
1	(0558)
1	(0715)
1	(0827)
1	(0703)
1	(0364)
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1	(0847)
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	4 (0815)
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	1 (0767)
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	2 (0462)
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	2 (0443)
	1 (0784)
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	1 (0828)
	1 (0495)
	1 (0670)
	1 (0692)
	1 (0709)
	k. Hydropower 219
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	2 (0216)
	4 (0503)
	1 (0556)
	1 (0533)
	2 (0456)
	1 (0213)
	1 (0640)
	2 (0584)
	5 (0540)
	1 (0559)
	2 (0776)
	14 (0212)
	2 (0416)
	ii. Cost of power
	1 (0534)
	3 (0549)
	2 (0581)
	1 (0480)
	1 (0205)
	4 (0206)
	1 (0202)
	1 (0203)
	1 (0299)
	1 (0520)
	1 (0736)
	1 (0737)
	1 (0722)
	3 (0497)
	1 (0711)
	4 (0277)
	3 (0578)
	2 (0702)
	2 (0278)
	10 (0390)
	2 (0614)
	1 (0598)
	iii. Impacts of proposed changes in Dam operation
	1 (0660)
	1 (0851)
	1 (0463)
	1 (0550)
	3 (0499)
	1 (0451)
	1 (0716)
	1 (0829)
	1 (0568)
	5 (0490)
	9 (0210)
	1 (0616)
	2 (0583)
	1 (0522)
	1 (0579)
	3 (0505)
	10 (0557)
	1 (0644)
	4 (0564)
	1 (0517)
	2 (0208)
	2 (0580)
	3 (0560)
	2 (0535)
	3 (0569)
	1 (0554)
	7 (0492)
	1 (0516)
	iv. Alternatives to hydropower generation
	1 (0785)
	1 (0195)
	14 (0273)
	1 (0305)
	2 (0269)
	2 (0268)
	4 (0197)
	1 (0542)
	1 (0768)
	v. Analysis of power issues in DEIS
	2 (0676)
	1 (0718)
	1 (0594)
	1 (0489)
	2 (0706)

Frequency	*(I.D. Number)*
1	(0551)
1	(0591)
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5	(0808)
1	(0593)
3	(0532)
2	(0391)
1	(0509)
7	(0389)
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13	(0335)
1	(0595)
ii. Definition	
12	(0219)
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1	(0567)
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8	(0257)
4	(0252)
2	(0684)
8	(0004)
5	(0313)
3	(0251)
1	(0664)
1	(0521)
4	(0255)
8	(0394)
1	(0773)
2	(0562)
1	(0758)
4	(0483)
1	(0253)
2	(0453)
3	(0248)
iii. Living in the southwest	
iv. Man's use of resources	
1	(0477)
2	(0536)
5	(0245)
1	(0241)
1	(0538)
1	(0763)
1	(0508)
1	(0726)
1	(0714)
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1	(0790)
1	(0850)
1	(0733)
2	(0695)
1	(0620)
1	(0734)
ii. Dams	
2	(0690)
1	(0700)
1	(0501)
1	(0783)
1	(0434)
1	(0433)
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4	(0328)
7	(0478)
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1	(0422)
1	(0724)
2	(0771)
3	(0288)
1	(0511)
1	(0627)
1	(0537)
1	(0518)
2	(0555)
4	(0544)
5	(0818)
4	(0681)
1	(0051)
3	(0006)
3	(0385)
9	(0493)
2	(0457)
1	(0548)

Frequency	*(I.D. Number)*
1	(0710)
1	(0610)
1	(0570)
2	(0649)
ii. Bias	
1	(0500)
iii. Outcome and decisions (ROD)	
1	(0678)
1	(0013)
1	(0011)
1	(0659)
1	(0766)
2	(0708)
2	(0479)
2	(0498)
2	(0512)
2	(0777)
iv. Government role and leadership	
1	(0010)
3	(0007)
10	(0017)
1	(0080)
1	(0014)
5	(0384)
1	(0719)
6	(0487)
1	(0488)
1	(0502)
1	(0707)
1	(0774)
1	(0725)
1	(0476)
2	(0843)
1	(0770)
5	(0817)
v. Analysis	
1	(0696)
1	(0759)
1	(0762)
4	(0055)
1	(0780)
1	(0597)
vi. Alternatives	
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1	(0461)
2	(0002)
vii. Public participation	
1	(0507)
d. Expressions About Comments (made by others). Sorted in alphabetical order. 7	
i. Support	
5	(0552)
1	(0717)
1	(0647)
ii. Disagree with	
e. Suggested Word Changes and Corrections (sorted by page reference). 0	

APPENDIX 5:

Overview of the Written Comments

Number of Individuals* Who Submitted Written Comments, by Type of Document and State of Residence

STATE	Letters	Card 1	Card 2	Card 3	Card 4	State Totals Count	State Totals Percent
Alabama		6				6	0.02%
Alaska	8	10	5			23	0.06%
Arizona	229	165	618	578	8	1,598	4.24%
Arkansas	2	6				8	0.02%
California	379	1,169	50	103		1,701	4.52%
Colorado	115	82	278	8	3	486	1.29%
Connecticut	13	23		1		37	0.10%
Delaware		6				6	0.02%
Dist of Columbia	4	7	2			13	0.03%
Florida	14	54	3	2		73	0.19%
Georgia	5	23				28	0.07%
Hawaii	2	5		1	2	10	0.03%
Idaho	7	16	1	18		42	0.11%
Illinois	17	123	6			146	0.39%
Indiana	4	21	2			27	0.07%
Iowa	2	11				13	0.03%
Kansas	4	6	2	1	2	15	0.04%
Kentucky		11				11	0.03%
Louisiana		13				13	0.03%
Maine	3	1	1		2	7	0.02%
Maryland	8	26	2			36	0.10%
Massachusetts	17	19	2		1	39	0.10%
Michigan	16	50	2			68	0.18%
Minnesota	11	26	4			41	0.11%
Mississippi	1	1				2	0.01%
Missouri	12	28	1			41	0.11%
Montana	2	15		1		18	0.05%
Nebraska	8	6	3		2	19	0.05%
Nevada	37	22	11	1,453		1,523	4.05%
New Hampshire	1	2				3	0.01%
New Jersey	2	27	1	2		32	0.09%
New Mexico	42	23	86			151	0.40%
New York	24	84	1			109	0.29%
No. Carolina	14	22	1			37	0.10%
No. Dakota		1				1	0.00%
Ohio	4	21	3			28	0.07%
Oklahoma	3	7	2			12	0.03%
Oregon	31	40	2	1	2	76	0.20%
Pennsylvania	16	56	1			73	0.19%
Rhode Island	2	4				6	0.02%
So. Carolina	3	5				8	0.02%
So. Dakota		1	1			2	0.01%
Tennessee	4	8	1			13	0.03%
Texas	19	76	4	1		100	0.27%
Utah	1,382	57	1,596	27,161		30,196	80.21%
Vermont	7	2	1			10	0.03%
Virginia	13	33	7	1		54	0.14%
Washington	25	63	3	3		94	0.25%
West Virginia	2	1				3	0.01%
Wisconsin	17	32	2			51	0.14%
Wyoming	28	12	5	1		46	0.12%
Canada		1				1	0.00%
France		1				1	0.00%
Japan	1					1	0.00%
Virgin Islands		2				2	0.01%
Unknown	134	59	11	242	40	486	1.29%
Totals							
Count*	2,694	2,591	2,721	29,578	62	37,646	100.00%
Percent	7.16%	6.88%	7.23%	78.57%	0.16%	100.0%	

*Numbers in this table reflect the fact that some documents were signed by more than one person. For this reason, the number of individuals exceeds the number of documents given in this report.

Number of Documents Submitted, by Type of Document and State of Sender's Residence

STATE	Letters	Card 1	Card 2	Card 3	Card 4	State Totals Count	State Totals Percent
Alabama		6				6	0.02%
Alaska	7	9	5			21	0.06%
Arizona	206	163	610	524	8	1,511	4.56%
Arkansas	2	6				8	0.02%
California	361	1,138	49	93		1,641	4.95%
Colorado	102	82	278	8	3	473	1.43%
Connecticut	11	22		1		34	0.10%
Delaware		5				5	0.02%
Dist of Columbia	4	7	2			13	0.04%
Florida	11	50	3	1		65	0.20%
Georgia	5	23				28	0.08%
Hawaii	2	5		1	2	10	0.03%
Idaho	7	16	1	16		40	0.12%
Illinois	17	118	6			141	0.43%
Indiana	4	19	2			25	0.08%
Iowa	2	10				12	0.04%
Kansas	4	6	2	1	2	15	0.05%
Kentucky		10				10	0.03%
Louisiana		13				13	0.04%
Maine	3	1	1		2	7	0.02%
Maryland	8	24	2			34	0.10%
Massachusetts	16	19	2		1	38	0.11%
Michigan	15	47	2			64	0.19%
Minnesota	11	26	4			41	0.12%
Mississippi	1	1				2	0.01%
Missouri	12	28	1			41	0.12%
Montana	2	15		1		18	0.05%
Nebraska	8	6	3		2	19	0.06%
Nevada	33	22	10	1,300		1,365	4.12%
New Hampshire	1	2				3	0.01%
New Jersey	2	27	1	2		32	0.10%
New Mexico	41	23	85			149	0.45%
New York	18	82	1			101	0.30%
No. Carolina	13	22	1			36	0.11%
No. Dakota		1				1	0.00%
Ohio	4	20	2			26	0.08%
Oklahoma	3	7	2			12	0.04%
Oregon	28	37	2	1	2	70	0.21%
Pennsylvania	15	54	1			70	0.21%
Rhode Island	2	4				6	0.02%
So. Carolina	3	5				8	0.02%
So. Dakota		1	1			2	0.01%
Tennessee	4	8	1			13	0.04%
Texas	19	73	4	1		97	0.29%
Utah	1,133	56	1,525	23,433		26,147	78.84%
Vermont	7	2	1			10	0.03%
Virginia	13	31	7	1		52	0.16%
Washington	24	61	3	3		91	0.27%
West Virginia	2	1				3	0.01%
Wisconsin	15	31	2			48	0.14%
Wyoming	25	12	5	1		43	0.13%
Canada		1				1	0.00%
France		1				1	0.00%
Japan	1					1	0.00%
Virgin Islands		2				2	0.01%
Unknown	124	57	11	206	40	438	1.32%
Totals							
Count	2,351	2,518	2,638	25,594	62	33,163	100.00%
Percent	7.09%	7.59%	7.95%	77.18%	0.19%	100.0%	

Organizations That Submitted Written Comments, by Name of Representative

		ENVIRONMENTAL DEFENSE FUND
		GRAND CANYON TRUST
Gary A.	Aitken	STRAWBERRY ELECTRIC SERVICE DISTRICT
Carl R.	Albrecht	GARKANE POWER ASSN, INC.
Gayle, Jerry, Russell	Aldred	WASHINGTON COUNTY COMMISSION
Frank	Ales	MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
Clair	Anderson	SPRINGVILLE CITY CORPORATION
Max O.	Anderson	COUNCILMAN, BEAVER CITY CORPORATION
Charles M.	Archer	SAN LUIS VALLEY RURAL ELECTRIC COOP, INC
Stanley H.	Ashby	ROOSEVELT IRRIGATION DISTRICT
Fay A.	Ashworth	BEAVER CITY CORPORATION
Steve	Atkin	BEAVER CITY CORPORATION
Bill	Baker	COLORADO WHITEWATER ASSOCIATION
William D.	Baker	ELECTRICAL DISTRICT NO. 6, PINAL COUNTY ARIZONA
Brad T.	Barber	STATE OF UTAH GOVERNOR'S OFFICE OF PLANNING AND BUDGET
Clifford	Barrett	COLORADO RIVER ENERGY DISTRIBUTORS ASSOCIATION (CREDA)
Calvin J.	Baxter	SPRINGVILLE CITY CORPORATION
Robert R.	Beatson	ARIZONA LEAGUE OF CONSERVATION VOTERS
Delora P.	Bertelsen	MAYOR, SPRINGVILLE CITY CORPORATION
Vaun	Bethers	LOGAN CITY LIGHT AND POWER
Lamont D.	Bettridge	BEAVER CITY CORPORATION
J. Douglas	Bird	SPRINGVILLE CITY CORPORATION
Bret	Black	BEAVER CITY CORPORATION
R. Leon	Bowler	DIXIE ESCALANTE RURAL ELECTRIC ASSOC
Jerry	Brouwer	MESA ELECTRIC UTILITY
Kemper	Brown	MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
Mike	Brown	DIXIE ESCALANTE RURAL ELECTRIC ASSOC
Henry A.	Brubaker	AGUILA IRRIGATION DISTRICT
HAROLD	Buckner	BEAVER DAM PROPERTY OWNERS ASSOCIATION
Ann M.	Buffington	BEAVER CITY CORPORATION
James T.	Burroughs	RESOURCES AGENCY OF CALIFORNIA
Thomas E	Cahill	COLORADO RIVER COMMISSION OF NEVADA
Tom	Cain	AMERICAN FISHERIES SOCIETY, ARIZONA - NEW MEXICO CHAPTER
Ronald J	Carey	POUDRE VALLEY RURAL ELECTRIC ASSN, INC
Lloyd	Carter	CALIFORNIA SAVE OUR STREAMS COUNCIL
Robert	Casillas	ARIZONA POWER AUTHORITY
Chesley	Christensen	MAYOR, MT PLEASANT CITY CORPORATION
Thomas C.	Collins	WYOMING GAME AND FISH DEPT

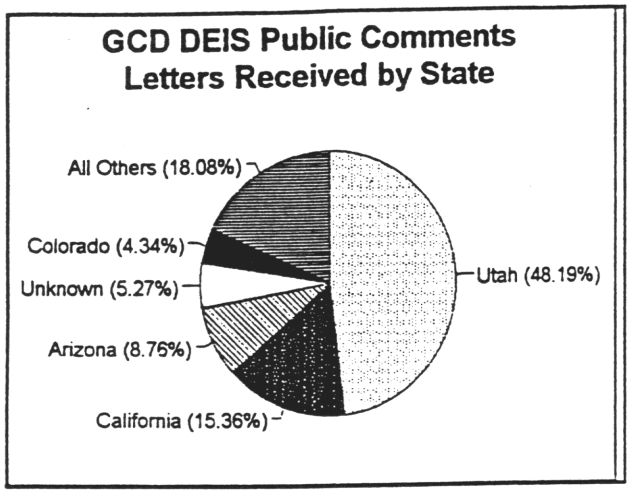
Gary	Colvin	BUCKEYE WATER CONSERVANCY AND DRAINAGE DISTRICT
	Condit	CORTARO WATER USERS' ASSOCIATION
Wayne E.	Cook	UPPER COLORADO RIVER COMMISSION
Glade Y.	Creer	COUNCILMAN, SPRINGVILLE CITY CORPORATION
Michael	Curtis	ARIZONA MUNICIPAL POWER USERS ASSN
John	Cuthbertson	INTERMOUNTAIN HEALTH CARE, L.D.S. HOSPITAL
Malcom P.	Dalton	NAVAJO TRIBAL UTILITY AUTHORITY
Don	Davis	SAN TAN IRRIGATION DISTRICT
Gerald J	Day	SNOW COLLEGE
Dennis W.	Dickson	MAYOR, MORGAN CITY CORPORATION
Brad	Dimock	GRAND CANYON RIVER GUIDES
Charles A.	Ditsch	TONOPAH IRRIGATION DISTRICT
Alan	Downer	NAVAJO NATION
James D.	Downing	MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
Connie C.	Dubinsky	MAYOR, TOWN OF LEVAN, UTAH
Lorraine	Ewfank	PAYSON WILDLIFE PRESERVE
		BRIDGER VALLEY ELECTRIC ASSOCIATION
Joe A.	Falbo	MARICOPA WATER DISTRICT
Gordon W.	Fassett	WYOMING STATE ENGINEERS OFFICE
P. Gary	Ferrero	COUNCILMAN, MURRAY CITY COUNCIL
Ivan W.	Flint	WEBER BASIN WATER CONSERVANCY DISTRICT
J.S.	Francis (Jr)	VALLEY INDUSTRIES
Sharon & Rob Smith	Galbreath	SIERRA CLUB SOUTHWEST OFFICE
Denis P	Galvin	U.S. DEPT OF INTERIOR, NATIONAL PARK SERVICE
Chris	Gehlker	CENTRAL ARIZONA WATER CONSERVATION DISTRICT
Wm. L.	Gibbs	MAYOR, LEHI CITY CORPORATION
Leonard S.	Gold	ALASKA CHIN INDIAN COMMUNITY
C.L.	Gould	WELTON - MOHAWK IRRIGATION AND DRAINAGE DISTRICT
Paul R.	Grimshaw	SANTA CLARA CITY, UT
Mark	Hibpshman	U.S. BUREAU OF MINES, DENVER
Francis T	Holt	US DEPT. OF AGRICULTURE, SOIL CONSERVATION SERVICE, UTAH
Kendrick J.	Hagen	CITY OF SANTA CLARA , UT
Gail	Haris	BEAVER CITY CORPORATION
Janna Frazier	Harkrider	MAYOR, POWELL WYOMING
Delbert	Havatone	HUALAPAI TRIBAL COUNCIL, WILDLIFE MANAGEMENT DEPT
J. Brent	Haymond	SPRINGVILLE CITY CORPORATION
James M.	Henderson	ARKANSAS RIVER POWER AUTHORITY
James	Henness	ARIZONA POWER AUTHORITY
James S	Heumann	HIGH COUNTRY RIVER RAFTERS
Kenneth w	Holt	U.S. DEPT OF HEALTH AND HUMAN SERVICES, PUBLIC HEALTH SERVICE

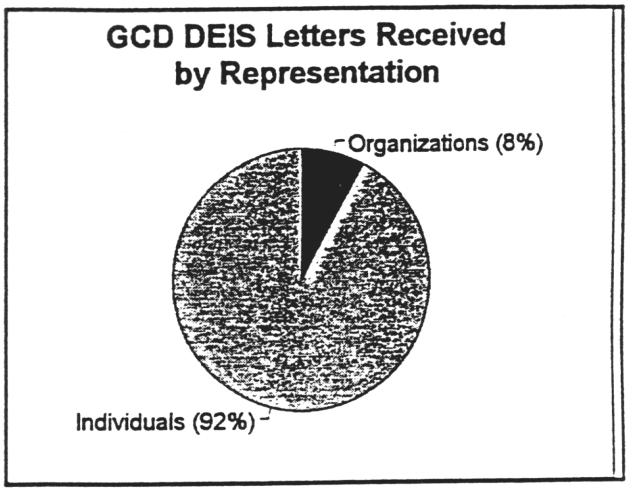
Louis R.	Holveck	VALLEY ELECTRIC ASSN, INC
Mirek	Horenovsky	CITY OF COLORADO SPRINGS
Gene E.	Hoskinson	CITY OF TRUTH OR CONSEQUENCES
Marie W.	Huff	MAYOR, SPANISH FORK CITY, UT
H. Arthur	Johnson	KAYSVILLE CITY CORP
Fred W.	Jones	COUNCILMAN, MURRAY CITY COUNCIL
G. Richards	Judd	UTAH MUNICIPAL POWER AGENCY
Herman L.	Kast	U.S. DEPT OF INTERIOR, BUREAU OF LAND MANAGEMENT
Conrad G.	Keyes, Jr.	INTERNATIONAL BOUNDARY AND WATER COMMISSION
Donald W.	Kimball	ARIZONA ELECTRIC POWER COOPERATIVE, INC.
Jason	King	NEVADA DEPT OF CONSERVATION AND NATURAL RESOURCES
James D.	Kirsch	HOT SPRINGS RURAL ELECTRIC ASSN
Frank R.	Knutson	TRISTATE GENERATION AND TRANSMISSION ASSOCIATION
Rod	Kuharich	COLORADO SPRINGS UTILITIES
Richard	Kuhn	COLORADO RIVER WATER CONSERVATION DIST
Robert H	Lane	COLORADO RIVER FRONT PROPERTY OWNERS ASSOC.
William Y	Leung	MUNICIPAL ENERGY AGENCY OF NEBRASKA
Larry	LaMaak	WYOMING MUNICIPAL POWER AUTHORITY
Rich	Lague	WILLAMETTE KAYAK AND CANOE CLUB
Eric D.	Larsen	COUNCILMAN
Leon E.	Lee	COUNCILMAN, SPRINGVILLE CITY CORPORATION
Hal	Lessing	BEAVER CITY CORPORATION
Jewell	Lewis	ARIZONA POWER AUTHORITY
Jim J.	Lewis	MT WHEELER POWER, INC
James S.	Lochhead	STATE OF COLORADO DEPT OF NATURAL RESOURCES
Robert C.	Lynch	IRRIGATION AND ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA
Emery	Maez	NORTHERN RIO ARRIBA ELECTRIC COOP
Bob	Marley	CENTRAL ARIZONA PADDLERS CLUB, INC
Ann S.	Marshall	COUNCILWOMAN, BEAVER CITY CORPORATION
Tom	Martens	FRIENDS OF THE RIVER
Carolyn S.	McNeil	INTERMOUNTAIN CONSUMER POWER ASSN
Paul N.	Means	THE OZARK SOCIETY
Valorie D.	Melton	HARQUAHALA VALLEY POWER DISTRICT
Clifford C.	Michaelis	BOUNTIFUL CITY LIGHT AND POWER
Thaine J.	Michie	PLATTE RIVER POWER AUTHORITY
Trent	Michie	THOMPSON MICHIE ASSOCIATES, INC
William	Miller	NEW MEXICO INTERSTATE STREAM COMMISSION
C.O.	Minckley	U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE, PARKER FISHERY
John	Mohlman	MURRAY CITY POWER

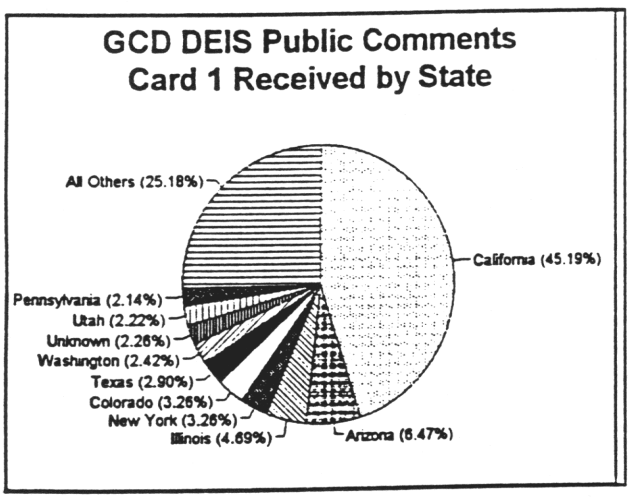
	Money	STATE SENATOR, UTAH - 17TH DISTRICT NATIONAL RESEARCH COUNCIL
Norman E.	Nielsen	COUNCILMAN, MURRAY CITY COUNCIL
Kirt	Nilsson	MAYOR, MONROE CITY CORPORATION
Cameron	Noel	BEAVER CITY CORPORATION
Ted L.	Olson	EPHRAIM CITY POWER BOARD
Bill	Orton	CONGRESSMAN, STATE OF UTAH
Matt	Packard	SPRINGVILLE CITY CORPORATION
Cornelio O.	Padilla	NEVADA DEPT OF ADMINISTRATION
Grant H.	Palfreyman	COUNCILMAN, SPRINGVILLE CITY CORPORATION
Chris	Parker	WASHINGTON CITY CHAMBER OF COMMERCE
Rita P.	Pearson	ARIZONA DEPT OF WATER RESOURCES
Gail	Peters	AMERICAN RIVERS
Lynn F.	Pett	MAYOR, MURRAY CITY CORPORATION
John E	Pope	INTERMOUNTAIN RURAL ELECTRIC ASSN
Patricia Sanderson	Port	U.S. DEPT OF INTERIOR, OFFICE OF THE SECRETARY, OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE
Ken A.	Rait	SOUTHERN UTAH WILDERNESS ALLIANCE
Dave	Redfield	COUNCILMEMBER, TOWN OF LUSK
Fred	Reimberr	FEDERATION OF FLY FISHERS AND TROUT UNLIMITED, STONEFLY SOCIETY OF SALT LAKE
Charles	Reinhold	ARIZONA POWER POOLING ASSN
Luis	Reyes	KIT CARSON ELECTRIC CORPORATION, INC
Leon B.	Robertson	COUNCILMAN, MURRAY CITY COUNCIL
James E.	Robinson	MAYOR, BEAVER CITY CORPORATION
Durand	Robison	FLOWELL ELECTRIC ASSN, INC
John A.	Rohr (PE)	MOUNTAIN VIEW ELECTRIC ASSN, INC
Wm. Kent	Romney	PAGE ELECTRIC UTILITY
Dave	Sabo	WESTERN AREA POWER ADMINISTRATION
Levi A.	Sanchez	JEMEZ MOUNTAINS ELECTRIC COOPERATIVE, INC.
Ferrell	Secakuku	HOPI TRIBE
Chris	Seldin	SIERRA CLUB LEGAL DEFENSE FUND
Mary	Selkirk	SIERRA CLUB, SAN FRANCISCO BAY CHAPTER
Janice	Sheftel	SOUTH WESTERN WATER CONSERVATION DISTRICT OF COLORADO, ANIMAS - LA PLATA WATER CONSERVANCY DISTRICT, SAN MIGUEL WATER CONSERVANCY DISTRICT
George M	Sheldon	PLAINS ELECTRIC GENERATION AND TRANSMISSION COOPERATIVE INC.
Jack T.	Skates	MAYOR, CITY OF CODY
Darrell E	Smith	SALT RIVER PROJECT
Gordon F.	Smith	COUNCILMAN, SPRINGVILLE CITY CORPORATION
Chris S.	Sorenson	COUNCILMAN, SPRINGVILLE CITY CORPORATION
William T.	Statton	FARMINGTON ELECTRIC UTILITY SYSTEM
Gaylord	Staveley	CANYONEERS
Robert	Steele	MAYOR, NEPHI CITY CORPORATION

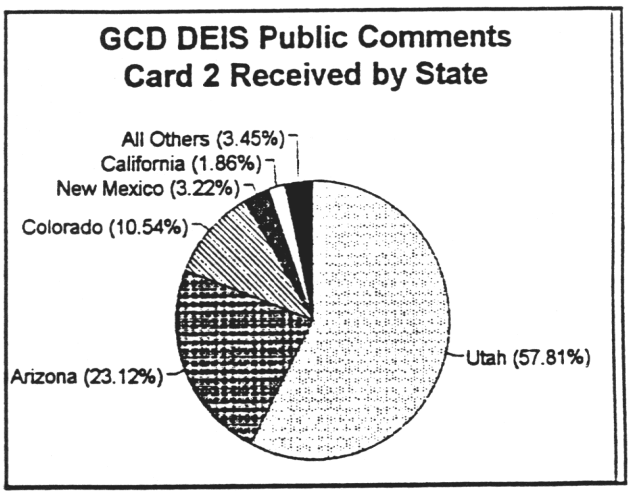
Don	Steuter	SIERRA CLUB, PALO VERDE GROUP, GRAND CANYON CHAPTER
George O.	Stewart	MAYOR, PROVO CITY
Kieran	Suckling	GREATER GILA BIODIVERSITY PROJECT
Mike	Sullivan	STATE OF WYOMING
James R.	Sweeney	ELECTRICAL DISTRICT NO. 4, PINAL COUNTY ARIZONA
Bruce D	Taubert	ARIZONA GAME AND FISH DEPT
Lynn H.	Turner	COUNCILMAN, MURRAY CITY COUNCIL
Mary E.	Vrrea	MCMULLEN VALLEY WATER CONSERVATION AND DRAINAGE DISTRICT
E.A.	Wueste	US DEPT. OF TRANSPORTATION, FEDERAL HIGHWAY ADMIN., REGION IX, ARIZONA DIVISION
Richard S.	Walden	ARIZONA POWER AUTHORITY
	Ware	SEVIER SCHOOL DISTRICT
Ken	Warren	SIERRA CLUB, HARVEY BROOME GROUP
Loren	Webb	DIXIE ESCALANTE RURAL ELECTRIC ASSOC
Julie	Weier	MIDWEST RENEWABLE ENERGY ASSN
Barry W.	Welch	US DEPT OF INTERIOR, BUREAU OF INDIAN AFFAIRS
George R	Wendt	OUTDOOR ADVENTURE RIVER SPECIALISTS
Amy B.	White	ENVIRONMENTAL EXPERIENCES, INC
Deanna M.	Wieman	U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX
Les	Williams	COUNCILMAN, BEAVER CITY CORPORATION
Larry	Wilson	TOWN OF LINGLE
Bruce	Winter	ARIZONA RIVER RUNNERS
Wm. D.	Woehlecke	ELECTRICAL DISTRICT NO. 5, PINAL COUNTY ARIZONA
Will	Wright	TOWN OF THATCHER
	Yep	DEPT OF THE ARMY, CORPS OF ENGINEERS, SACRAMENTO
James	Young	U.S. DEPT OF INTERIOR, FISH AND WILDLIFE SERVICE
Gerald	Zimmerman	COLORADO RIVER BOARD OF CALIFORNIA

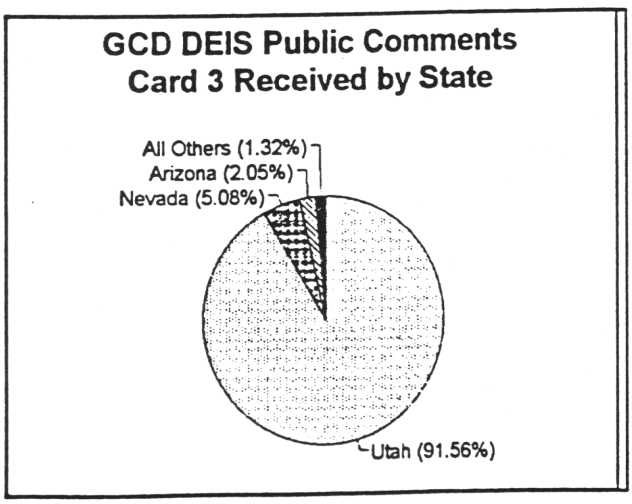
Graphical Representations of Comment Data

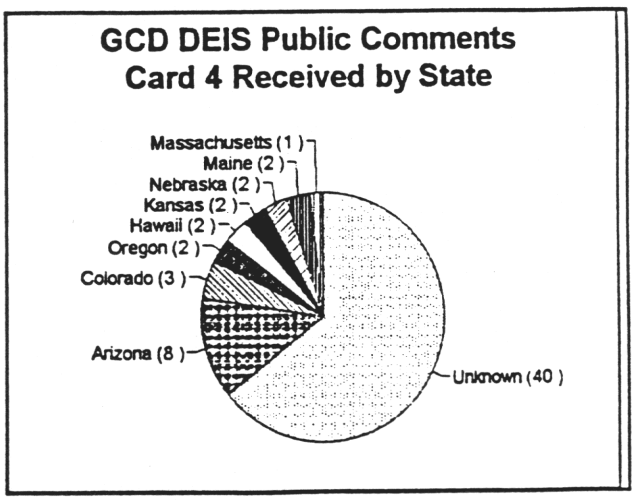












Text of Pre-printed Cards

Text of Card #1

Dear Mr. McQuivey,

This is my official comment on the Glen Canyon draft Environmental Impact Statement. The final EIS should provide detailed directions as to how the ecological elements of the Grand Canyon can be restored and protected for generations to come. I favor the preferred alternative with the following conditions:

1. Ensure that the monitoring and adaptive management program be developed with public involvement, be scientifically based, insulated from political pressure, and fully funded so that needed studies can be completed.
2. Ensure that endangered species and other studies are based on solid scientific research made credible through peer review, such as the National Academy of Sciences.
3. Fund and begin NEPA compliance studies to understand the pros and cons of the possible installation of a temperature control device at Glen Canyon Dam so that warm water can be sent downstream to protect and restore endangered species.
4. Ensure preservation and replenishment of beaches by funding a long term solution to sand depletion.

Sincerely.

_____

Text of Card #2

COMMENTS ON THE DRAFT EIS FOR GLEN CANYON DAM OPERATIONS

The preferred alternative should be the current dam operations (Interim Low Fluctuating Flow Alternative) with the changes your Cooperating Agencies Group has recommended. These Interim operating criteria have provided the best starting point for future operation of Glen Canyon Dam. No significant future experiments such as flooding the riparian habitat or radically changing water releases should be decided upon now. The public is entitled to a thorough explanation of what is being proposed and what the risks are to Grand Canyon and other resources. The public is also entitled to comment on any such significant actions. Neither this draft EIS nor this comment process give the public the necessary information or the opportunity to comment on the currently proposed experiments.

Long-term monitoring of the affected Colorado River resources is essential. The Adaptive Management Program being proposed ensures that future experiments, studies and proposed changes to dam operations will get careful review by independent scientific experts before any further changes are made.

Name_____

_____

Signature

Address_____

Text of Card #3

COMMENT CARD

I am writing about the Glen Canyon Dam environmental impact statement.

* The Bureau should let science determine the flows through the dam, not politics. A few special interest groups should not dictate dam operations.
* Also, consider the environmental trade-offs. Utilities will buy power from coal plants if generation is reduced at Glen Canyon Dam. That is not "environmental protection."
* Take costs impacts into account. Cutting power generation at Glen Canyon Dam will force up power rates.

_____

(Print name and address)

Text of Card #4

Helloooo! I'm Charlie the Chub. I live in the Grand Canyon, and have been an Endangered Species since 1973. In the last 30 years, fluctuating flows, and cold water releases from Glen Canyon Dam have done away with my river buddies, the Colorado squawfish, the razorback sucker, and (sob!) the bonytail chub. Please help me from also vanishing in the Grand Canyon by signing that you are in support of the Seasonally Adjusted Steady Flow Alternative, which will stop daily fluctuating flows in Grand Canyon. Then return this portion before April 11, to the Bureau of Reclamation's address on the other side. See you on the river, I hope.

Name (please print)_____

Name (please sign)_____

Individuals Who Submitted Written Comments on Their Own Behalf

ALFRED
DALE
DART & JENNIFER
DAVID
DEBRA & ROSSI
E. A.
GREG KIM & SARA
JODY & PRICE
JOHN CODY
MONT & DOROTHY
MR. & MRS. N.S.
NANCY & BLACKBURN & RANDY
OLA & GEORGE
P. W.
RANDY
3C CATTLE CO.
4-D PLUMBING & BUILDERS SUPPLY
A TRUSS INC
AA HOME IMPROVMENT CO
ABA CONDO
MICHELLE ABADIE
ELIZABETH ABBEY
ALAN ABELES
JOSEPH ABERDALE
EVA ADAIR
ALAN H ADAMS
LUTHER ADAMS
MARION T ADAMS
MARTIN ADAMSON
HERB ADELMAN
LOIS ADESCK
JACK ADLER
LINDA I ADLER-BRADEN
ROBERT AGHGZARIM
CRAIG ALDER
F ALEXANDER
GAYLE ALEXANDER
RICK ALEXANDER
JAKE ALLBRITTON
HARRIEH ALLEN
PAUL ALLEN
STEPHEN ALMQUIST
ALEX AMBS
LOUIE AMBS
MICHELE AMBS
BRAD AMER
SCOTT AMUNDSON
JENNIE AMY
DONALD ANDERS
HENRY ANDERSEN
BRIAN ANDERSON
CARL ANDERSON
CHRIS ANDERSON
CLIFFORD ANDERSON
JULIAN L. & FAYE H. ANDERSON
K C ANDERSON
KURT ANDERSON
MARY SUE ANDERSON
PAULETTE ANHOLM
MARK APMAN
MR & MRS B APPLING
ERNEST ARBUCKLE
CRISTINA ARGUEDAS
FRANK ARGUS
KELIA ARIZUMI
KRISTEN ARKUSH
ELLEN ARMBRUSTER
FUCHSIA ARNOLD
ROBERT ASHER
ELLIS I. ASPER
JMAES M ATON
MARK AUDAS
CODIE AUSTIN
R B AUSTIN
SUSAN AYLWARD
LACHELLE AAGARD
PATRECE AAGARD
RYAN D. AAGARD
JEFF AANERUD
JAY & KATHY AANON
THOMAS R. AARDIN
JOSEPH AARON M.D.
JAN AARTHUN
MR. & MRS. K. AASEN
SOFIE ABALOS
GHANIM A. S. ABBADI
GREG ABBOT
B. ABBOTT
CLIFFORD & DORIS ABBOTT
DORI ABBOTT
MELVIN L. ABBOTT
SHELDON L. ABBOTT
VAL ABBOTT
VANCE ABBOTT
RICK & SUSAN ABBRUZZESE
TODD E. ABEL
VIOLA ABEL
VERRON D. ABERLE
GENE ABERNANTHY
BETTY G & WALTER W. ABERNATHY
RIC & JENNIFER ABERS
DON ABETA
ARSENIO H. ABEYTA
DON ABEYTA
VIVIEN ABEYTA
J. ABIASOTTI
ROBERT ABIECUNAS
ANNALYN ABIZAHAM
JOHN ABLAHANI
NORMAN E ABNEY
MARY JEAN M. ABSHIRE
TONY ACCURSO
HANK ACHENBACH
STANLEY R & BARBARA ACKER
DAVID ACKERMAN
MELODY ACKERMAN
TINA ACKERMAN
DAVID M. ACKLEY PE
ACME SIN CO. INC.
MR. & MRS. CHARLES J ACONDA
DEBORAH ACORD
WILLIAM T. ACORD
ACTION WOOD MFG
ZELMA B. ACTON
SERGIO G ACUNA
CLARA ADAIR
ELLA ADAIR
FREDEROCK ADAIR
J.Q. ADAIR
LYLE ADAIR
LYNN ADAIR
MR. & MRS. B. ADAIR
WAYNE ADAIR
WILLIAM ADAIR
A. MIKE ADAMS
ALMA L. ADAMS
ANNE ADAMS
ARLENE ADAMS
ARTHUR D. & THELLA E. ADAMS
BARBARA ADAMS
BELVA ADAMS
BLANCHE ADAMS ,
BRENT & ANNE ENGLERT ADAMS
CLINT E. ADAMS
CRAIG & BARBARA ADAMS
CRAIG & SUSAN ADAMS
D. WATSON ADAMS
D.K. ADAMS
DANIEL N ADAMS
DANIEL T. ADAMS
DAROLD ADAMS
DAVID & KERRIE ADAMS
DAVID W. ADAMS
DAWN M. ADAMS
DEE B. ADAMS
DEEWAYNE ADAMS
DIANA C ADAMS
DONALD ADAMS
DONALD S. ADAMS
DORIS ADAMS
DR. L. LAMAR ADAMS
DWIGHT ADAMS
ED ADAMS
EDWARD J ADAMS
ELAINE S. ADAMS
FAITH ADAMS
GEORGE ADAMS
GERALD L & DIANA ADAMS
GLEN ADAMS
HOWARD & MARGARET ADAMS
J. ADAMS
JACQUELINE L. ADAMS
JAMES O. ADAMS
JANIS ADAMS
JAY ADAMS
JAY M. ADAMS
JIM ADAMS
JOHN ADAMS
JOHN & TAMARA ADAMS
JULIE & DAVID ADAMS
JUNE K. ADAMS
KANDICE & CORY (LUCINDA LARSON) ADAMS
KEVIN ADAMS
LAVERDA T. ADAMS
LEROY W. ADAMS
LONNY E. ADAMS
LORAINE D. ADAMS
LOVENA M. ADAMS
MACK S. ADAMS
MARGARET & CHAUNCEY S ADAMS
MARICA ADAMS
MARION DEE ADAMS
MARION T. ADAMS
MATHEW ADAMS

MILDRED ADAMS
MR. & MRS. STAN ADAMS
MRS. ELDON ADAMS
NOLA ADAMS
ORPHA H. ADAMS
P ADAMS
REED L. ADAMS
RICHARD D ADAMS
RICHARD L. ADAMS
RICK K. ADAMS
ROBERT S. ADAMS
ROBERT W. ADAMS
ROGER C. ADAMS
RONALD ADAMS
S. ADAMS
S.R. ADAMS
S.W. ADAMS
SHEROLL ADAMS
SHERWIN M. ADAMS
STEVE ADAMS
TEBBS ADAMS
TOM ADAMS
VALERIE ADAMS
VERA DEE ADAMS
VICTOR A. ADAMS
WILLIAM ADAMS
JOHN E. ADAMS (MD)
A.W. ADAMSON
ARDELL ZIMMERMAN ADAMSON
BLAINE W. ADAMSON
CAROLYN & ALLEN ADAMSON
DAVID ADAMSON
MR. & MRS. R. ADAMSON
MR. & MRS. J. ADAMSON
PATRICK K. ADAMSON
RICHARD ADAMSON
ROBERTA ADAMSON
CHUCK & ROSE ADAN
LEONARD ADAUR
MARJORIE ADAUR
STEVE ADELSON
H. I. ADELT
LA JUANA ADELT
KENNETH ADKINS
JEROME ADKINSON
LILLIAN S. ADLER
MR. & MRS. JACK T. ADLER
JOHN L. ADMAS
JULIE ADOLPHSON
MARY ADOOR
FRED & TERI ADSIT
ADVANCED TURBO SYSTEMS
RENIE (MAUAREEN) AEGERTER
DERRICK AGNEW
MARCELLA AGNEW
JOSE G. AGUILAR
HENRY AGUIRRE
HENRY H. RICK AGUIRRE
RICH AGUIRRE
RICK AGUIRRE
CHAVEZ JAMESON AGURRE
PATRICIA AHARONOV
M. TERRY & CONCHA AHGUIST
RAY C. AHLANDER
RACKEL AHLSTOM
FLOYD AHLSTROM
N. PEARL AHLSTROM
TAMARA AHRENS
MRS. FRANK AIELLO
TROY AIGGINSON
SAM AIKEN
JAY AINGE
L. AINGE
MAX& HELEN AINGE
PHIDON AINGE
TAMMIE AINGE
KEITH H. AINSOWRTH
AINSWORTH
C. A. AINSWORTH
KEN D. AIRD
RAY E. AITKENS
LOIS AKAGI
DRVE AKENL
AL'S TROPHIES AND FRAMES INC.
NAZIH AL-RASHID
NORMA AL-IMARI
AARO ALAROTV
FELIX & SUSANA ALBA
ERNIE ALBANESE
MARTIN P ALBERT
WELDON ALBERTSEN
G.J. ALBERTSON
KENNETH ALBERTSON
LAVON ALBERTSON
MARILYN KING & STEVEN
ALBERTSON
MARION H. ALBISTON
BRANDON ALBRECHT
CARL R. ALBRECHT
MARTHA G. ALBRECHT
OWEN L. ALBRECHT
SHERWOOD ALBRECHT
TORVAL ALBRECHT
W. STEVE ALBRECHT
SUSAN ALBRECHTSEN
REX L ALBRECT
KENT ALBREUT
JACK & HELEN ALBRIGHT
R.C. ALBRIGHT
WILLIAM J. ALBRIGHT
GENE ALCORA
DAVID L. ALCORN
JAYNE A. ALCORN
ROBERT E. ALCORN
LAWRENCE & CAROHY ALDEN
RAYMOND M ALDEN
CHARLES ALDER
CLYDE H ALDER
DENNIS ALDER
E. IVAN ALDER
JOHN ALDER
L. C. ALDER
REUEI ALDER
ROBERT H. ALDER
THERESSA ALDER
ALDER CONSTRUCTION CO.
REED ALDERMAN
ETHEL M ALDRED
EDWARD O. ALDRICH
EUNICE ALDRICH
MELVIN ALDRICH
TOD ALEAMONI
A. LYNN & SHARON ALEXANDER
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RICHARD C. & SALLEE WORTHEN
W. MERRILL WORTHEN
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LORI WORTHINGTON
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DARLENE WYLLIE
CALVIN WYMAN
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ED WYMAN
MARVIN L. & IDA BELLE WYMAN
NINA M WYMAN
W. PATRICK WYMAN
BARBARA ANN WYMER
LEEANN WYNE
WYNN
G. BRENT WYNN
K.F. WYNN
ROBERT WYNN
SCOTT WYVCOFF
DARRELL YARDLEY
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PETER YONT
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JULIN YOUNG
MICHAEL A. YOUNG
PAUL L YOUNG
R E YOUNG
RON YOUNGBERG
RONALD J YOUNGER
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REBECCA YAGER
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RON YAMADA
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APPENDIX 6:

Official Public Notices and Meeting Materials

News Release

Upper Colorado Region

BUREAU OF RECLAMATION
Lisa Guide (202) 208-4662
Barry D. Wirth (801) 524-5403
For Release: January 6, 1994

RECLAMATION RELEASES DRAFT GLEN CANYON DAM EIS CHANGES TO PROTECT GRAND CANYON

Commissioner of Reclamation Daniel P. Beard today released a Draft Environmental Impact Statement (DEIS) that recommends changing the operations of the Glen Canyon Dam, Arizona, to minimize adverse impacts on the downstream environmental, cultural, and economic resources in the Grand Canyon.

"This document represents an historic precedent for managing Colorado River water," said Commissioner Beard. "It outlines a new set of proposed instructions for operating Glen Canyon Dam. These guidelines would protect the environmental and cultural resources of the Grand Canyon and the Colorado River region."

"I consider today's release as the demarcation line between the old way we have treated the river, and the way of the future," said Commissioner Beard. "It is the perfect example of the Clinton Administration's new philosophy of managing water to meet the needs of a broader spectrum of interests."

Beard said the process used in developing this DEIS "speaks as loudly as the document itself."

"Many conflicting interests have come together and produced this plan to protect the magnificent Grand Canyon," said Commissioner Beard. "In the old days, these documents were developed behind closed doors with water lawyers, engineers, and irrigation district representatives. Now we are throwing the doors wide open and including community leaders, Native Americans, the recreation industry, environmentalists, and many others. I look forward to reviewing the public's comments as we move towards finalizing this draft statement."

The 311 page document presents nine alternatives that cover a full range of possible operations of Glen Canyon Dam. The preferred alternative is the Modified Low Fluctuating Flow Alternative, developed to significantly reduce daily flow fluctuations below the historic release pattern.

(more)

Under the preferred alternative, river flow fluctuations from the historic range are narrowed. The ramping rate, the rate of change in flows both up and down as power demand fluctuates, is restricted, and the daily volume of change is constrained from the historic pattern. This serves to meet the needs of the various riverine environments and protect recreational uses of the river, while providing for a limited amount of peaking power capability from the hydropower plant.

The maximum releases would be limited to 20,000 cubic feet per second (cfs). Minimum releases would be 8,000 cfs in the daytime and 5,000 cfs at night. The ramp rates would be limited to 2,500 cfs increases and 1,500 cfs decreases. Research demonstrated that rapid ramping down rates were especially damaging, justifying the greater restriction.

The preferred alternative would provide a number of immediate benefits. Sediment would accumulate in the river system and long-term beach degradation would stop. The streamside vegetation would stabilize above the 20,000 cfs level, which is distinctly beneficial to wildlife. Cultural resources, including archeological sites and traditional cultural properties important to Native Americans, would be protected. Flows would favor river runners while protecting the beaches necessary for camp sites. As with most of the alternatives, hydropower generation would be reduced, but there remains some limited flexibility.

The benefits and impacts to fish are less known. Reclamation and the U.S. Fish and Wildlife Service have agreed, through the Endangered Species Act consultation process, to undertake research flows to continue studying the needs of endangered fish. Those flows would consist of low, steady flows in summer and fall combined with higher, steady spring flows.

The preferred alternative and eight other alternatives are grouped into three broad categories:

- Unrestricted Fluctuating Flows with the No Action and Maximum Powerplant Capacity Alternatives;
- Restricted Fluctuating Flows with High, Moderate, Modified Low, and Interim Low Alternatives; and
- Steady Flows with Existing Monthly Volume, Seasonally Adjusted, and Year-Round Steady Flow Alternatives.

These alternatives provide a full spectrum of analysis ranging from flows that exceed historic peaking-power operations to flows that would essentially remain constant year-round. Depending upon alternatives, power production would range from fully maximized to severely limited.

The DEIS was prepared in accordance with Title XVIII of the Reclamation Projects Authorization and Adjustments Act of 1992, which required a reevaluation of dam operations to minimize adverse impacts on the downstream environmental and cultural resources and Native American interests in Glen and Grand Canyons. Reclamation involved a number of Federal, State, and Native American interests as cooperating agencies, including the Bureau of Indian

(more)

Affairs, U.S. Fish and Wildlife Service, National Park Service, Department of Energy's Western Area Power Administration, Arizona Game and Fish Department, Hopi Tribe, Hualapai Tribe, Navajo Nation, Pueblo of Zuni, San Juan Southern Paiute Tribe, and Southern Utah Paiute Consortium. Extensive public involvement throughout the Colorado River Basin also contributed to this draft.

Critical to the success of the preferred alternative will be an adaptive management program. Through adaptive management, the data collected through scientific monitoring and additional research, including the special fishery flows, will be considered with dam operations accordingly adjusted. The adaptive management process is common to most of the alternatives in the DEIS, allowing for a continual fine-tuning of the dam's operations.

To assist the public in understanding the DEIS, there will be informational open houses held on the DEIS from 5:00 to 9:00 p.m. at the following locations and dates:

Salt Lake City, UT, February 11, 1994, Salt Lake Airport Hilton, 5151 Wiley Post Way;
Phoenix, AZ, February 16, 1994, YWCA Training Center, 9440 North 25th Avenue;
Flagstaff, AZ, February 17, 1994, Little America Hotel, 2515 East Butler Avenue; and
Washington, D.C., January 27, 1994, Stouffer Concourse Hotel, 2399 Jefferson Davis Highway, Arlington, VA.

The DEIS is now open for public review. Written comments will be accepted until April 11, 1994. Public Hearings will be held from 7:00 to 9:30 p.m. at the following locations and dates:
Los Angeles, CA, March 7, 1994, Burbank Airport Hilton, 2500 Hollywood Way;
San Francisco, CA, March 9, 1994, Fort Mason Conference Center, Golden Gate National Recreation Area, Marina Boulevard and Buchanan Street;
Phoenix, AZ, March 14, 1994, YWCA Training Center, 9440 North 25th Avenue;
Flagstaff, AZ, March 15, 1994, Little America Hotel, 2515 East Butler Avenue;
Salt Lake City, UT, March 17, 1994, Salt Lake Hilton, 150 West 500 South;
Denver, CO, March 21, 1994, Marriott Denver West, 1717 Denver West-Marriott Boulevard;
Washington, D.C., March 24, 1994, Capitol Hill, Dirksen Senate Office Building, Room 562 (2:00 to 4:30 p.m.); and
Washington, D.C., March 24, 1994, Stouffer Concourse Hotel, 2399 Jefferson Davis Highway, Arlington, VA (7:00 to 9:30 p.m.).

Please direct inquiries or written comments to: Colorado River Studies Office, Bureau of Reclamation, P.O. Box 11568, Salt Lake City, UT, 84147, 801-524-5479.

Note to radio: Actualities of Commissioner Beard are available on the Department of the Interior's toll free actuality line, 1/800-521-3370, beginning 1:00 pm EST.

DEPARTMENT OF THE INTERIOR

Operation of Glen Canyon Dam, Colorado River Storage Project, Arizona

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice of availability and notice of public hearings on the draft environmental impact statement; INT–DES–94–01.

SUMMARY: In response to a July 27, 1989, directive from the Secretary of the Interior and pursuant to section 102(2)(C) of the National Environmental Policy Act of 1969, as amended, and in accordance with the Grand Canyon Protection Act of 1992, the Bureau of Reclamation (Reclamation) has prepared a draft environmental impact statement (DEIS) on the operation of Glen Canyon Dam, Colorado River Storage Project in Arizona. The DEIS evaluates nine alternatives, including no action, and analyzes their impacts on downstream environmental and cultural resources and Native American interests in Glen and Grand Canyons. Seven public hearings will be held to receive comments from interested organizations and individuals on the environmental impacts of the proposal.

DATES AND LOCATIONS: A 90-day public review period begins with the publication of this notice. Written comments on the DEIS should be submitted to the Colorado River Studies Office by April 11, 1994.

Public hearings on the DEIS will be held on the following dates at the locations indicated. Address requests to speak at the hearings to the Colorado River Studies Office at the address provided on the following page.

- March 7, 1994, Los Angeles, California: Burbank Airport Hilton, 2500 Hollywood Way, Burbank CA 91505, 7 to 9:30 p.m.
- March 9, 1994, San Francisco, California: Fort Mason Center, Golden Gate National Recreation Area, San Francisco CA 94123, 7 to 9:30 p.m.
- March 14, 1994, Phoenix, Arizona: YWCA, 9440 North 25th Avenue, Phoenix AZ 91505, 7 to 9:30 p.m.
- March 15, 1994, Flagstaff, Arizona: Little America, 2515 East Butler Avenue, Flagstaff AZ 86003, 7 to 9:30 p.m.
- March 17, 1994, Salt Lake City, Utah: Salt Lake Hilton, 150 West 500 South, Salt Lake City UT 84101, 7 to 9:30 p.m.
- March 21, 1994, Denver, Colorado: Marriott Denver West, 1717 Denver West Marriott Boulevard, Golden CO 80401, 7 to 9:30 p.m.
- March 24, 1994, Washington, DC: Dirksen Senate Office Building, room 562, 2 to 4:30 p.m.; Stouffer Concourse (Crystal City), 2399 Jefferson Davis Highway, Arlington VA 22202, 7 to 9:30 p.m.

ADDRESSES: Written comments on the DEIS, requests for copies, and requests to testify should be addressed to: Mr. Lee J. McQuivey, Colorado River Studies Office, Bureau of Reclamation, Attention: UC–1500, PO Box 11568, 125 South State Street, Salt Lake City UT 84147; telephone: (801) 524–5479.

Copies of the DEIS are available for inspection at the address above and also at the following locations:

- Office of the Commissioner, Bureau of Reclamation, Technical Liaison Division, 1849 C Street, NW., Washington DC 20240.
- Denver Office, Bureau of Reclamation, Library, room 167, Building 67, Denver Federal Center, Denver CO 80225.
- Upper Colorado Regional Office, Bureau of Reclamation, Library, room 7101, 125 South State Street, Salt Lake City UT 84147.
- Center for Environmental Studies, Arizona State University, 905 South Mill Avenue, Tempe AZ 85287–3211.
- Glen Canyon Environmental Studies Office, Security Bank Building, 121 East Birch, room 307, Flagstaff AZ 86002.

Libraries

Arizona

Arizona Department of Water Resources Library, Phoenix.
Arizona State Library, Department of Library, Archives and Public Records, Phoenix.
Arizona State Regional Library for the Blind and Physically Handicapped, Phoenix.
Arizona State University, Noble Science and Engineering Library, Tempe.
Arizona State University, Hayden Library, Tempe.
Flagstaff City-Coconino County Public Library, Flagstaff.
Grand Canyon Community Library, Grand Canyon.
Maricopa County Library, Phoenix.
Mesa Public Library, Mesa.
Mohave County Library/Kingman Public Library, Kingman.
Northern Arizona University, Cline Library, Flagstaff.
Page Public Library, Page.
Phoenix City Library, Phoenix.
Scottsdale Public Library, Scottsdale.
Tempe Public Library, Tempe.
Tucson Public Library, Tucson.
University of Arizona Library, Tucson.

California

California State Library, Sacramento.
California State University, Hayward Library, Hayward.
California State University, University Library, Los Angeles.
Colorado River Board of California Library, Glendale.
Environmental Protection Agency, Regional IX Library, San Francisco.
Los Angeles Public Library, Los Angeles.
Los Angeles Public Library, Water and Power Section, Los Angeles.
San Francisco Public Library, San Francisco.
Stanford University Libraries, Stanford.
University of California, General Library, Berkeley.
University of California, University Research Library, Los Angeles.
University of California, Shields Library, Davis.
University of Southern California, Doheny Memorial Library, Los Angeles.

Colorado

Colorado State University Libraries, Fort Collins.
Denver Central Library, Denver.
University of Colorado at Boulder, Norlin Library, Boulder.
University of Denver, Penrose Library, Denver.
U.S. Air Force Academy, Academy Library, Colorado Springs.

Nevada

Boulder City Library, Boulder City.
Clark County Library District, Las Vegas.
Nevada State Library, Carson City.
University of Nevada, Reno Library, Reno.
University of Nevada at Las Vegas, James Dickinson Library, Las Vegas.

New Mexico

Albuquerque Public Library, Albuquerque.
New Mexico State Library, Santa Fe.
New Mexico State University, Las Cruces.
University of New Mexico, Albuquerque.

Utah

Brigham Young University, Harold B. Lee Library, Provo.
Cedar City Public Library, Cedar City.
Kanab City Library, Kanab.
Moab Public Library, Moab.
Salt Lake City Public Library, Salt Lake City.
Salt Lake County Library System, Salt Lake City.
Southern Utah State University Library, Cedar City.

University of Utah, Marriott Library, Salt Lake City.

Utah State University, Merrill Library, Logan.

Utah State Library, Salt Lake City.

Washington County Library, St. George.

Weber State University Stewart Library Ogden.

Wyoming

Laramie County Library System, Cheyenne.

Rock Springs Public Library, Rock Springs.

University of Wyoming, Coe Library, Laramie.

Wyoming State Library, Cheyenne.

Washington, DC

District of Columbia Public Library.

Library of Congress.

Natural Resources Library, Department of the Interior.

Other States—any U.S. Government Regional Depository Library.

FOR FURTHER INFORMATION CONTACT: Mr. Lee J. McQuivey, Colorado River Studies Office, Bureau of Reclamation, PO Box 11568, Salt Lake City UT 84147; telephone: (801) 524–5479.

SUPPLEMENTARY INFORMATION: The Secretary of the Interior called for a reevaluation of dam operations to determine specific options that could be implemented, consistent with law, to minimize adverse impacts on the downstream environmental and cultural resources and Native American interests in Glen and Grand Canyons.

In accordance with the National Environmental Policy Act and the Grand Canyon Protection Act of 1992, Reclamation has prepared a DEIS in cooperation with other Interior agencies—Bureau of Indian Affairs, Fish and Wildlife Service, and National Park Service. Other cooperating agencies are the Department of Energy's Western Area Power Administration, Arizona Game and Fish Department, Hopi Tribe, Hualapai Tribe, Navajo Nation, Pueblo of Zuni, San Juan Southern Paiute Tribe, and the Southern Utah Paiute Consortium.

The DEIS presents analyses of the impacts of nine alternatives for operating Glen Canyon Dam. Two alternatives, including no action, would allow unrestricted hourly fluctuations in riverflow; four would provide various levels of restricted fluctuating flows; and three would provide steady flows. Additional measures have been combined with the alternative operations, where appropriate, to provide additional resource protection or enhancement. The preferred alternative is the Modified Low Fluctuating Flow Alternative.

Hearing Process Information

Those wishing to request time to make comments at the public hearing should write or call the Bureau of Reclamation Regional Office in Salt Lake City, Utah. The address and telephone number are listed above. Requests should be received on or before February 28, 1994, and should indicate where the speaker wishes to appear. Speakers will be called upon to present their comments in the order in which their requests were received. Requests to speak also may be made at each hearing. These commentors will be called on after the advance request speakers. Oral comments will be limited to 5 minutes per individual.

For inclusion in the hearing record, written comments from those unable to attend the hearing or wishing to supplement their oral presentation should be received at the Bureau of Reclamation Regional Office in Salt Lake City by April 11, 1994.

Dated: January 3, 1994.

Jonathan Deason,

Director, Office of Environmental Policy and Compliance.

[FR Doc. 94–306 Filed 1–6–94; 8:45 am]

BILLING CODE 4310–94–M

Fish and Wildlife Service

Notice of Availability of Draft Environmental Impact Statement for the Proposed Patoka River National Wetlands Project, Pike and Gibson Counties, Indiana

AGENCY: U.S. Fish and Wildlife Service, Interior.

ACTION: Notice.

SUMMARY: This notice advises the public that the U.S. Fish and Wildlife Service (Service) has prepared a Draft Environmental Impact Statement (DEIS), which is available for public review. The DEIS evaluates a proposal to establish the Patoka River National Wetlands Project (Project) in Pike and Gibson Counties in southwest Indiana. Four alternatives, including a No Action alternative are being considered. The three action alternatives are aimed at protecting and enhancing the valuable resources of the Patoka River valley. The Project encompasses one of the last remaining stretches of bottomland forest in Indiana and the Midwest. It provides some of the best wood duck production habitat in the state and is used by endangered species including bald eagles. Alternative 4 is the Service's preferred alternative. It proposes to acquire 22,083 acres of land from willing sellers. Full acquisition may take 20 years or more. About 6,800 acres would be purchased as the Patoka River National Wildlife Refuge. Additionally, wildlife management areas would be purchased from within an adjacent 15,283-acre selection area. Project lands would be managed to protect and enhance bottomland hardwood forests, other wetland habitat, and complementary uplands. The goal would be to provide essential food, cover and resting areas for migratory birds, threatened and endangered species, and resident fish and wildlife; and to improve outdoor recreation and education opportunities.

DATES: Public comment on the DEIS is solicited pursuant to National Environmental Policy Act regulations (40 CFR 1503.1). All agencies and individuals are urged to provide comments and suggestions for improving this DEIS. The formal comment period extends for a 60-day period from the date of distribution of the DEIS. All comments received by March 8, 1994, will be considered in preparation of the Final EIS.

Formal comments will be received at any time during this 60-day period in person or by mail at the Project and Regional Offices as well as at the scheduled public open house and meeting. The Project Office in Oakland City, Indiana, is open weekdays from 8 a.m. to 4:30 p.m. The Regional Office in the Twin Cities, Minnesota, is open weekdays from 7:30 a.m. to 4 p.m. In addition, the Service will hold a public open house on Friday, February 11, 1994, from 9 a.m. to 7 p.m. and Saturday, February 12, 1994, from 8 a.m. to 12 m. (noon) at the Wirth Park Community Building on the west side of Oakland City, Indiana, for general information. A public meeting will be held on Saturday, February 12, 1994, starting at 1:30 p.m. in the East Gibson School cafeteria in Oakland City to receive verbal and written comments.

WRITTEN COMMENTS SHOULD BE ADDRESSED TO: Project Manager, U.S. Fish and Wildlife Service, Patoka River National Wetlands Project, 510½ West Morton, Box 217, Oakland City, Indiana 47660.

FOR FURTHER INFORMATION CONTACT: William McCoy, Project Manager, Patoka River National Wetlands Project, at the above address, telephone (812) 749–3199; or Jeanne Holler, Wildlife Biologist, U.S. Fish and Wildlife Service, Bishop Henry Whipple Federal Building, 1 Federal Drive, Fort Snelling, Minnesota 55111–4056, telephone (612)

News Release

Upper Colorado Region

Salt Lake City, Utah
Lisa Guide (202) 208-4662
Barry D. Wirth (801) 524-5403
For Release: January 24, 1994

RECLAMATION TO BRIEF AREA PUBLIC ON DRAFT GLEN CANYON DAM EIS CHANGES TO PROTECT GRAND CANYON PROPOSED

An informational briefing concerning the recently released Bureau of Reclamation Draft Environmental Impact Statement (DEIS), which recommends changing operations of Glen Canyon Dam, Arizona, to protect the Grand Canyon, will be held in the Washington, D.C., area. The session, on January 27, 1994, will provide interested individuals with an opportunity to learn more about the DEIS prior to providing public comments due April 11, 1994.

Private citizens and interested groups in the Washington, D.C., area have long been following the progress of the DEIS, starting with a public scoping meeting held in the Interior Building on March 27, 1990, when work on the DEIS first started. That meeting, along with scoping meetings in Arizona, California, Colorado, and Utah, reflected the national interest in the operation of the dam and it's impact on Grand Canyon. During that scoping phase, over 17,000 persons and groups, including many from the east coast, provided their input.

This new briefing will be held at 7 p.m. at the Stouffer Concourse Hotel, 2399 Jefferson Davis Highway, Arlington, Virginia (Crystal City). A short video will be shown explaining the EIS and representatives from Reclamation will be available to answer questions and offer insight into the DEIS document and to answer questions. This session is to provide information only and not to accept public comments on the DEIS.

The briefing will cover the DEIS alternatives, including the preferred alternative which is the Modified Low Fluctuating Flow Alternative developed to reduce the daily flow fluctuations below the historical release pattern. The alternatives in the DEIS are grouped into three broad categories:

. Unrestricted Fluctuating Flows which includes the No Action and Maximum Powerplant Capacity Alternatives;

(more)

. Restricted Fluctuating Flows which includes High, Moderate, Modified Low, and Interim Low Alternatives; and

. Steady Flows which includes Existing Monthly Volume, Seasonally Adjusted, and Year-Round Steady Flow Alternatives.

Common elements to the restricted fluctuating and steady flow alternatives are: adaptive management, monitoring and protecting cultural sites, flood frequency reduction measures, beach/habitat-building flows, new population of humpback chub, further study of selective withdrawal, and emergency exception criteria.

The alternatives range from those which call for high fluctuating river flows to those that dictate flows that are essentially constant year-round. Depending upon the alternative, power production would range from fully maximized to severely limited.

Under the Modified Low Fluctuating Flow Alternative, which is the preferred alternative, historical river flow fluctuations are narrowed. The ramping rate, which is the rate of change in flows both up and down as power demand fluctuates, is restricted, and the daily fluctuation is constrained from the historic pattern. This serves to meet the needs of the various riverine environments and protects recreational uses of the river, while providing for a limited amount of peaking power capability from the hydropower plant.

The operating criteria would be essentially the same as interim operations which have been in effect since August 1991. The maximum releases from the dam would be limited to 20,000 cubic feet per second (cfs). Minimum releases would be 8,000 cfs in the daytime and 5,000 cfs at night. The change in the flow rates would be limited to 2,500 cfs per hour increases and 1,500 cfs decreases per hour.

In addition to the Washington D.C. briefing, public information sessions will be held in Salt Lake City, UT, Flagstaff, AZ, and Phoenix, AZ.

Two formal hearings to receive public comment on the DEIS will be conducted in Washington D.C. on March 24, 1994. The first will be from 2:00 pm to 4:30 pm in the Dirksen Senate Office Building, Room 562. The second will be that evening from 7:00 pm to 9:30 pm at the Stouffer Concourse Hotel, 2399 Jefferson Davis Highway, Arlington, VA.

Inquiries, or written comments, should be directed to: Colorado River Studies Office, Bureau of Reclamation, PO Box 11568, Salt Lake City, UT, 84147, or phone 801-524-5479.

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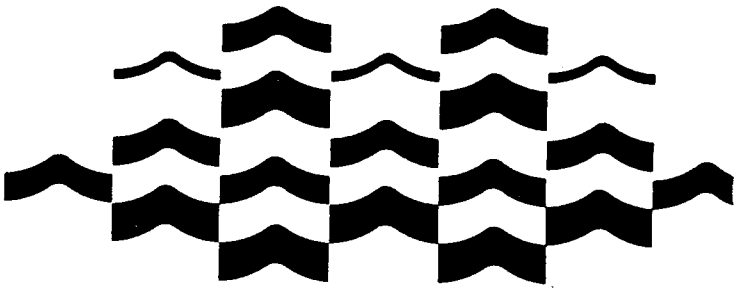
News Release

Upper Colorado Region



Salt Lake City, UT
Barry D. Wirth (801) 524-5403
For Release: February 28, 1994

RECLAMATION TO HOLD PUBLIC HEARINGS ON GLEN CANYON DAM DRAFT EIS

A public hearing on the recently released draft Environmental Impact Statement calling for changing operation of Glen Canyon Dam to protect the Grand Canyon will be held in the Los Angeles area on March 7, 1994. This public hearing is the first of eight to be held across the United States.

The public hearings will provide interested individuals with an opportunity to present oral comments to Reclamation representatives on the draft EIS. The public hearing will be held from 7-9:30 p.m. at the Burbank Airport Hilton, 2500 Hollywood Way, Burbank, California.

The draft EIS, filed with EPA on January 4, 1994, was prepared in cooperation with various Federal Government agencies, the Arizona Department of Game and Fish, and Indian Tribes, with extensive public input. California residents expressed extensive interest in this EIS at public scoping meetings held in 1990 in Los Angeles and San Francisco. The public comment period which began on January 4 will conclude on April 11.

Nine alternatives are presented in the draft EIS, including the preferred alternative, titled Modified Low Fluctuating Flow Alternative. That alternative was designed to reduce the daily flow fluctuations of the Colorado River through Grand Canyon well below the historical release pattern.

Additional public hearings will be conducted in San Francisco on March 9, Phoenix on March 14, Flagstaff on March 15, Salt Lake City on March 17, Denver on March 21, and two hearings in Washington, DC, on March 24.

(more)

To request to be placed on the speaker's list, please contact the: Colorado River Studies Office, Bureau of Reclamation, PO Box 11568, Salt Lake City, Utah 84147, or telephone 801-524-5479, at least 5 days prior to the hearing at which you would like to speak. You may also sign up to speak when registering at the hearing. Each speaker will be limited to 5 minutes, and time sharing will not be allowed. It is suggested that remarks be summarized and a written statement be presented to the hearing officer for the public record.

To obtain a copy of the 65-page summary of the draft EIS, or the entire 740-page, three volume EIS, or to submit written comments, please contact Reclamation's Colorado River Studies Office at the above address.

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Operation of Glen Canyon Dam
Draft Environmental Impact Statement
Public Information Sessions

Three public information sessions are scheduled in February 1994 to acquaint people with the Operation of Glen Canyon Dam Draft Environmental Impact Statement (EIS).

Each session will begin at 5 p.m. and end at 9 p.m., with a short formal presentation beginning at 6:30 p.m. which will include a video on the Glen Canyon Dam EIS process. Members of the multi-agency EIS team will present displays and be available during the sessions to answer questions and offer insight into how the EIS alternatives, including the preferred alternative, affect the resources of the Grand Canyon. In addition, on January 27, 1994, Reclamation will provide a brief overview of the EIS to congressional staffs in Washington, DC. This briefing will be repeated in its entirety for the public beginning at **7 p.m on January 27, 1994, at the Stouffer Concourse, 2399 Jefferson Davis Highway, Arlington, Virginia (Crystal City).**

These public information sessions are to provide you with information only. Formal Public Hearings to receive your comments will be held in March in Los Angeles and San Francisco, California; Phoenix and Flagstaff, Arizona; Salt Lake City, Utah; Denver, Colorado; and Washington, DC. We ask that you submit your comments on the draft at that time and/or in writing to: ***Mr. Lee J. McQuivey, Colorado River Studies Office, Bureau of Reclamation, PO Box 11568, Salt Lake City, Utah 84147.***

The Draft EIS was released in early January 1994. The public comment period will conclude on April 11, 1994. Copies of the 72-page summary of the draft were distributed to over 16,000 addressees on the CRSO newsletter mailing list, and the Draft EIS was distributed to about 1,000 entities. If you would like to receive either a copy of the summary or the three volume, 740-page Draft EIS, please contact: ***Colorado River Studies Office, PO Box 11568, Salt Lake City, Utah 84147, or telephone 801-524-5479.***

We wish to take this opportunity to thank you for participating in this EIS process. Your participation continues to be important. We hope that these public information sessions will provide an opportunity to more fully understand the Draft Glen Canyon Dam Environmental Impact Statement.

Public Information Sessions Schedule

Salt Lake City, Utah
Date: February 11, 1994
Time: 5 - 9 p.m.
Formal presentation 6:30 p.m.
Location: Salt Lake Airport Hilton
5151 Wiley Post Way

Phoenix, Arizona
Date: February 16, 1994
Time: 5 - 9 p.m.
Formal presentation 6:30 p.m.
Location: YWCA
9440 North 25 Avenue

Flagstaff, Arizona
Date: February 17, 1994
Time: 5 - 9 p.m.
Formal presentation 6:30 p.m.
Location: Little America
2515 East Butler Avenue

Operation of Glen Canyon Dam
Draft Environmental Impact Statement
Formal Public Hearings

Formal Public Hearings will be held in March 1994 to obtain comments on the Operation of Glen Canyon Dam Draft Environmental Impact Statement (EIS).

Each Public Hearing will begin at 7 p.m. except for the Hearing on Capitol Hill. To request to be placed on the speaker's list, please contact the: ***Colorado River Studies Office, Bureau of Reclamation, PO Box 11568, Salt Lake City, Utah 84147, or telephone 801-524-5479***, at least **5 days prior to the Hearing at which you would like to speak.** You may also sign up to speak when registering at the Hearings. Each speaker will be limited to 5 minutes and time sharing will not be allowed. We suggest that remarks be summarized and a written statement be presented to the Hearing Officer for the public record.

The Draft EIS was filed on January 4, 1994, and the public comment period will conclude on April 11, 1994. If you would like to receive either a copy of the 72-page summary or the three volume, 740-page Draft EIS (which includes the summary), please contact the Colorado River Studies Office at the above address.

We wish to take this opportunity to thank you for participating in this EIS process and encourage you to submit your comments by April 11, 1994, in order to ensure that they are thoroughly considered and responded to in the Final EIS.

Formal Public Hearings Schedule

Los Angeles, California
Date: March 7, 1994
Time: 7-9:30 p.m.
Place: Burbank Airport Hilton
2500 Hollywood Way
Burbank, California

San Francisco, California
Date: March 9, 1994
Time: 7-9:30 p.m.
Place: Fort Mason Conference Center
(Golden Gate National Recreation Area)
Entrance: Marina Blvd. and Buchanan St.

Phoenix, Arizona
Date: March 14, 1994
Time: 7-9:30 p.m.
Place: YWCA
9440 North 25th Avenue

Flagstaff, Arizona
Date: March 15, 1994
Time: 7-9:30 p.m.
Place: Little America
2515 East Butler Avenue

Salt Lake City, Utah
Date: March 17, 1994
Time: 7-9:30 p.m.
Place: Salt Lake Hilton
150 West 500 South

Denver, Colorado
Date: March 21, 1994
Time: 7-9:30 p.m.
Place: Marriott Denver West
1717 Denver West - Marriott Blvd.
Golden, Colorado

Washington, DC

Date: March 24, 1994
Time: 2-4:30 p.m.
Place: Capitol Hill, Dirksen SDOB, Room 562, Corner of 1st St. and Constitution Avenue, NE

Date: March 24, 1994
Time: 7-9:30 p.m.
Place: Stouffer Concourse
2399 Jefferson Davis Highway
Arlington, Virginia (Crystal City)

Ground Rules
Public Hearing
Operation of Glen Canyon Dam
Draft Environmental Impact Statement

The following ground rules will be adhered to throughout the formal public hearings on the Operation of Glen Canyon Dam Draft Environmental Impact Statement (EIS):

While each hearing is in session, all verbal comments will be recorded by a court reporter.

No one will be recognized to speak other than those parties who are presenting statements.

To ensure a complete and accurate record, it will be necessary that only one person speak at a time.

Persons presenting views will not be sworn in or otherwise placed under oath.

There will be no examination or interrogation of speakers.

Statements will be limited to 5 minutes, and speakers will not be allowed to trade time to obtain longer presentations. The hearing officer may allow any speaker additional time after all scheduled speakers have been heard. The hearing officer may also shorten the 5-minute limit if the number of speakers is too large to fit within a reasonable timeframe.

Due to the shortness of available time, speakers are encouraged to summarize their comments as much as possible and give the court reporter a copy of their full statement which will be added to the official record.

Speakers should identify themselves and any organization that they represent.

Whenever possible, speakers have been scheduled according to time preference requested. Any speaker not present when called will lose his or her turn in the scheduled order but will be given an opportunity to speak at the end of the scheduled presentations.

After the scheduled speakers have been heard, each individual who wishes to speak will be afforded that opportunity.

All written comments should be received by April 11, 1994, in order to ensure that they are thoroughly considered and responded to in the Final EIS.

Clapping or outbursts interfere with speakers and are not appropriate.

REGISTRATION CARD
DRAFT EIS PUBLIC HEARING
Operation of Glen Canyon Dam Environmental Impact Statement

Please Print Clearly

Name_____

Address _____
Street

_____
City State Zip Code

Affiliation (if any)_____

Do you wish to speak at this meeting? _____Yes ___No

Who do you represent? ___Self ___Organization:_____

Are you an elected or appointed government official? ___Yes ___No
If yes, what office do you hold?_____

Meeting Location: ___LA ___SF ___PHX ___FLAG ___SLC ___DEN ___DC

⊛

REGISTRATION CARD
PUBLIC INFORMATION SESSIONS - DRAFT EIS
Operation of Glen Canyon Dam Environmental Impact Statement

Please Print Clearly

Name_____

Address _____
Street

_____
City State Zip Code

Affiliation (if any)_____

Who do you represent? ___Self ___Organization:_____

Are you an elected or appointed government official? ___Yes ___No
If yes, what office do you hold?_____

Are you on the Colorado River Studies Office Newsletter Mailing List? ___Yes ___No

Do you wish to be on the Colorado River Studies Office Newsletter Mailing List? ___Yes ___No

Meeting Location: ___Salt Lake City ___Phoenix ___Flagstaff ___ Washington, D.C.

⊛

APPENDIX 7:

List of Preparers

List of Preparers

The following persons on the Bear West Consulting Team prepared this report:

Ralph E. Becker, Jr.
D. J. Baxter
R. Thayne Robson
Elizabeth Romney
James A. Robson

The Bear West Consulting Team would also like to express its gratitude to Gordy Lind and Kate O'Hare of the Bureau of Reclamation's Colorado River Studies Office for their invaluable assistance in preparing this report.