CREDA
Colorado River Energy Distributors Association

ARIZONA
Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO
Colorado Springs Utilities

CORE Electric Cooperative

Holy Cross Energy

Platte River Power Authority

Tri-State Generation & Transmission Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric Association, Inc.

NEBRASKA
Municipal Energy Agency of Nebraska
(also Colorado, Wyoming)

NEVADA
Colorado River Commission of Nevada

Silver State Energy Association

NEW MEXICO
Farmington Electric Utility System

Los Alamos County

UTAH
City of Provo

City of St. George

Heber Light & Power

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING
Wyoming Municipal Power Agency

Leslie James
Executive Director
CREDA
10429 S. 51st St., Suite 230
Phoenix, Arizona 85044

Phone: 480-477-8646
Fax: 480-477-8647
Cellular: 602-469-4046
Email: creda@creda.cc
Website: www.credanet.org

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Bureau of Reclamation
Attn: BCOO-1000
P.O. Boc 61470
Boulder City, NV 8900-1470
Crbpost2026@usbr.gov

The Colorado River Energy Distributors Association (CREDA) appreciates the opportunity to provide comment on Reclamation's Draft Environmental Impact Statement on the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead ("DEIS"), as published in Fed. Reg. Vol. 91, No. 11 (January 16, 2026). CREDA members are all not-for-profit entities, and include tribes, municipalities, rural electric cooperatives, political subdivisions, and state agencies. CREDA members serve about 5 million consumers in the Colorado River basin states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, and represent the majority of the firm electric service customers of the Colorado River Storage Project (CRSP). As such, CREDA and its members have a unique interest and role in issues associated with Colorado River operations.

CREDA offers initial comments, reserving the ability to supplement following receipt and analysis of rate information. Please ensure that any rate analysis, in the event it attempts to quantify or describe the "market value of electricity" should be interpreted as *a single benchmark that* measures the value of *the* electricity *produced by CRSP* to participants in the U.S. wholesale market*, including the CRSP contract holders*. The *market value* reflect the contribution of WAPA CRSP GCD to the broader power system *rather than revenues* received by WAPA. Under WAPA's current rate design framework, the rates charged to preferred customers are *based on the cost of the resource and are decoupled* from the market value of power." (emphasis added), (see Yu, et al., p. 20, 2025). Stated another way, as required by Congress, WAPA's customers pay a rate based on the cost of the resource regardless of the market value. To the extent that cost-based rate is BELOW the market value, the contract holders receive a benefit from holding a CRSP contract. To the extent that rate is ABOVE the market value of the resource, the contract holder pays for a resource that has marginal or no benefits.

CREDA offers summary points, as amplified in Appendix A, followed by a matrix of detailed comments, including DEIS section and page numbers. **Recognizing the potential of a consensus alternative emerging following issuance of the DEIS, CREDA requests the Final EIS include full impact analysis of any new alternative, and provide a minimum of 45 days public review and comment prior to issuance of a ROD.**

CREDA submitted pertinent comments on these issues on April 30, 2020, August 31, 2022, September 29, 2022, December 20, 2022, May 21, 2023, and August 11, 2023, as well as hydropower principles on June 4, 2024, and incorporates those comments herein by reference.

SUMMARY POINTS

1. Pursuant to federal law, hydropower is an authorized *purpose* of the federal Colorado River system dams and should not be categorized for analysis as an "environmental resource." CREDA recommends including the following in Chapter 1: "Hydropower generation at Glen Canyon Dam and Hoover Dam is an authorized project purpose under federal statute, and is evaluated in this Draft EIS in that context."

2. Power features of the federal dams are equivalent to water features in the context of *infrastructure.* In the event structural elements are included in the preferred alternative, Reclamation should establish a consultation process with its project water and power customers prior to and following the issuance of the FEIS.

3. Any discussion concerning the protection of infrastructure should include protection of hydropower resources. Powell Infrastructure Protection (PIP) analysis and processes must include CRSP contract holders in the "collaborative decision-making among stakeholder workgroups" (p. O-1. Appendix O, and Chapter 4 (p. 4-4). Reference to CRSP contract holders should also be included in footnotes 16, 17 (p.2-13, 2-15).

4. Reclamation has an obligation to explain what operational elements may be implemented as part of the Flaming Gorge and Aspinall Unit Records of Decision (RODs). Without specific description of releases that may be implemented as "operational flexibility," the impact analysis and assessment ascribed to the water and power resources is not achievable. Recognizing Glen Canyon Dam provides the largest amount of CRSP hydropower generation, Flaming Gorge and Aspinall generation (Initial Units) is integrated and operated with Glen Canyon as a single integrated contract product; therefore, operational parameters must be defined in order to complete this particular analysis.

5. The Upper Colorado River Basin Fund is an integral element of CRSP infrastructure operations and stability and should be analyzed and included as an impact indicator in the DEIS. The economic viability of the CRSP is directly linked to hydropower revenues maintained in the Basin Fund, and impacts to the Basin Fund must be analyzed and considered. If the Basin Fund is jeopardized, so too is the government's ability to pay for the operation and maintenance of the CRSP facilities. See also item 6 below.

6. Reclamation must consider measures to mitigate adverse impacts to the hydropower resource. The Department's NEPA Handbook (516 DM 1), at Section 1.3(e) (2)(c)(2)(1).

7. High Flow Experiments (HFES) are *experiments* and should not be included as an assumption or impact category.

8. Assumptions and impacts based on Bishop et al (1987) in the context of *fluctuations* vs. *flow* levels should be reconsidered.

COMMENT MATRIX

Vol	Section	Pg	Comment
ES		12	"Key resources" should be defined in the DEIS. Is this intended to be a listing of *performance objectives,* as referenced on ES-18? How were they determined? Hydropower is a statutorily authorized *purpose* of both the CRSP and Hoover projects. Yet in this context, hydropower is not separately identified as such and lumped in with recreation and "natural."
ES	ES.3.2	19	Reference to "energy" should be removed from the litany of "other environmental resources". See comment above – hydropower is a statutory purpose and has to be treated as such in any analysis.
ES	ES.3.2	35	See above narrative regarding HFEs. Remove as an impact indicator

		62	Same comment regarding landscape character. This reference to HFEs is qualitative and should be removed.
ES	E.S.3.2	61	Disagree that less visibility of GCD or Hoover Dam is preferable. This indicator should be removed as an impact indicator. In our experience, Reclamation has not included dam existence as a landscape feature in this manner in previous NEPA documents related to the Colorado River. The DEIS appears to assign a negative connotation to both Glen Canyon and Hoover Dams by virtual of their existence/visibility. The basis for this interpretation must be included in the documentation.
TA 5	Figures TA 5-5, TA 5-6	5-15, 5-16	These figures and the accompanying text do not describe how monthly volumes were determined for this analysis. Monthly volumes are determined under the LTEMP ROD. The DEIS analyses may be incorrect and provide misleading conclusions. Any discussion or analysis using monthly volumes for the DEIS should be removed.
TA 15	TA 15.1	15-1	Third paragraph – replace the current description of the CRSP with one that includes the generation of hydropower as a statutorily authorized purpose.
		15-2	Include reference to Appendix K and the LTEMP (2016) as a source of additional hydropower generation information that should be incorporated in this DEIS. That information is much more robust than the 2007 cited materials.
	TA 15.1.2	15-2	Revise the third sentence to include "costs of Reclamation, including costs of irrigation repayment." As dictated by Federal statute, WAPA rates include much more than just powerplant costs.
		15-2	Reference to "over 100 customers" should refer to 'CRSP', not 'Glen Canyon Dam'. The customers purchase resources from the CRSP in total, not separate output from GCD.
		15-3	Either include reference to "wholesale" when discussing customers, or include the number of "retail" customers and identify the distinction between types of wholesale versus retail customers.
	TA 15.1.3	15-4	Remove reference to "HFEs" when referring to the uses of river outlet works as constructed.
		15-6	Include reference to RODs along with "drought conditions" as limitations on the powerplants' ability to generate to full capacity. This recommendation is supported by the text noted in the comment immediately below.
		15-6, 7 Table TA15-3	The DEIS defines capacity, power, and firm capacity. An additional indicator should be included – installed capacity. Consider adding an additional line to Table TA 15-3 that shows *installed* capacity compared to *available* capacity. Installed capacity is a necessary element in assessing Alternative impacts to reliability of the electric grid. Capacity can also be used in discussion of Alternative impacts to WAPA's Contract Rate of Delivery (CROD) commitments to each hydropower customer.
	TA 15.1.4	15-16	Include reference to the LTEMP ROD (2016) along with reference to the 1996 ROD.
		15-19	The Colorado River Storage Project paragraph should include reference to "not-for-profit" before "customers." In addition, municipalities include all sizes, not just small and medium. Without a rate analysis available, CREDA withholds comment on the paragraph describing impact analysis based on the 8 largest customers. As drafted, this text appears similar to what was used in the LTEMP analysis, which if that is the case, is well out of date. There is not a direct correlation in all cases between the size of a customer and the percentage of its resource mix represented by CRSP. In fact, some of the smaller CRSP customers are likely to be disproportionally impacted by rate or availability of the CRSP resource.
	TA	15-22	Impact indicators should refer to "CRSP" power, not Glen Canyon Dam power.

	15.2.2		Although Glen Canyon Dam is the largest generator in the CRSP, the rates include generation from additional units, such as Flaming Gorge and Aspinall.
	TA 15.2.3	15-27	The meaning of power pool "robustness" needs definition, as it is not a term that is generally understood in the electric utility industry. Issue 1 is summarized in terms of "most" and "least" robustness, but it is unclear to what that descriptor applies.
	TA 15.2.6	15-40	Reference should be included to "reducing experimental releases" as an additional way to reduced controlled discharges over the spillway.
1		xii.	Replace "Association" with "Administration" in the definition of WAPA.
	1.8.4.1	1-22	The last sentence above Figure 1-5 should be modified to include "and power" after "water". The power purpose and power facilities are part and parcel of the critical infrastructure at Glen Canyon Dam. Note that the parallel paragraph (1.8.4.2) regarding Hoover Dam clearly includes the hydropower features.
	1.8.6	1-25	This paragraph is quite limited and should be expanded to include the authorizing project statutes for the CRSP, and the Boulder Canyon and Parker-Davis projects. As drafted the public could misinterpret a complex set of authorities, rate setting, customer base and contracts are all the same for the "more than 182 customers" to whom WAPA capacity and energy is dedicated by contract. In addition, customers include more than "utility systems"; CREDA recommends WAPA provide clarifying language.
	1.9.4	1-30	Insert "while maintaining all statutorily authorized purposes" at the end of the first paragraph, referring to the 2012 Aspinall Unit ROD. Meeting flow/temperature recommendation in these RODs are conditioned on maintaining the statutory purpose of the projects.
	2.1	2-3	See request in paragraph 3 (bold) page 1.
	2.5	2-11	Revise reference to Reclamation's "need to balance the needs of water AND POWER users with infrastructure concerns in real time under such conditions."
	2.6	2-16	See above discussion about treatment of hydropower as a statutorily authorized purpose, not a "key resource." The power features of the federal dams are part of the critical infrastructure of these projects, and the generation of hydropower are statutorily authorized purposes of the projects.
	3.5.2	3-63	Remove issue 3 as an impact indicator. There is sufficient science available to assess impacts to geomorphologic resources without adding a further level of uncertainty and complexity to the analysis.
	3.8	3-89	Recommend clarification in the Nonnative Fish Species that green sunfish may be "managed as sportfish" in certain reaches, but below Lake Powell they are treated as a nonnative predator and competitor and a clear threat to the Humpback Chub, a threatened species under the Endangered Species Act.
	3.8.2	3-92	Consider including reference to hydrology in addition to dam operations as an impactor (possibly the most significant impactor) to water temperature.
		3-93	Remove the paragraph referencing HFE impacts. It is subjective in its applicability to the description of Issue 2 water quality and temperature. This view is supported by the statement that "HFEs are primarily intended for sediment management…. ."
	3.11.2	3-122	It is unclear the state of the science on the direct relationship between HFEs and windblown/aeolian sand transport; analysis should include the impact on this impact indicator (bullet 3) based on windblown sediments minus the inclusion of assumed HFEs.
		3-131	As described, Issue 2 appears to assume that aeolian transport definitively protects archaeological sites in Grand Canyon. The citations, however, are all 2026 and appear to be limited to Lee's Ferry to Bright Angel Creek. Given the length of the river corridor, CREDA questions whether "general conclusions are pertinent to the entire river." As noted above, analysis of the impact of aeolian transport minus assumed HFEs should be performed.

	3.14	3-134	See narrative discussion under Key Point 5 regarding interpretation and use of Bishop et al 1987 in the context of the first full paragraph.
		3-156	Consider restating assumption bullet 2 regarding Bishop et al.
	3.15	3-162	Reference to reduced power generation should be revised to "1996" as opposed to "2007", reflecting the first ROD that affected power generation at Glen Canyon Dam.
		3-163	In the second paragraph under Hydroelectric Power Distribution, reference to operational flexibility in the context of "customer demand" should be expanded to *specifically include ROD 2016 (B.2),* which delineates conditions under which operational flexibility may be exercised. In the third paragraph, reference to "not-for-profit in accordance with federal law" should be included.
	3.15.2	3-164	Remove "WAPA" in reference to "retail customers." WAPA markets at wholesale to not-for-profit entities; CREDA recommends WAPA provide clarifying language.
		3-165	CREDA looks forward to reviewing the rate and market value analysis, as well as DMDU analysis. In the event the analysis is available in advance of issuance of the Final DEIS, please make it available.
	3.18	3-195	Acknowledging the multitude of benefits considered Indian Trust Assets, consider that over 50 Tribes are CRSP firm electric service customers. Impacts to hydropower and rates have impacts to Tribes that, through a bill crediting arrangement, are unique from other customers and should be analyzed and identified.
	3.19.1	3-201	The Grand Canyon Protection Act of 1992 does not "*specifically* call(s) for the conservation of visual resources". If there is a desire to include reference to the GCPA in this section, the sentence should be corrected.
	3.19.2	3-203	Assumption bullet 2 should be revised to remove "and the potential inability to conduct HFEs from Glen Canyon Dam". Decreasing flow rates alone should be the analyzed assumption.
		3-204 3-209 TA 19.5 19.7 19.8 19.9	Glen Canyon Dam is not an "attraction feature" in either the LTEMP EIS/ROD or the 2007 Guidelines EIS or ROD. Glen Canyon Dam and Hoover Dam should be removed from the DEIS analysis as impact indicators (bullet 1). TA 19 states that for both Glen Canyon and Hoover Dams, the American Society of Civil Engineers considers them "one of the finest examples of concrete, thin arch dams in the United States" and "one of the seven engineering wonders in the United States", respectively. Recognizing that these areas are not designated as wilderness at this time, the assumption that less dam visibility is "preferred" appears to be an erroneous assumption. (TA 19.1.1, 19.1.3). Indeed, the summary paragraph of 19.2.6 makes no mention of dam visibility.
	4.6	4-4	Remove reference to "Power Agency" in the title, or provide information as to its reference.

End of matrix

APPENDIX A – KEY POINTS SUPPLEMENTAL DISCUSSION

1. **HYDROPOWER IS A STATUTORY PURPOSE**. As Glen Canyon Dam is one of the two key facilities addressed in this process, it is important at the outset of this process to recognize the statutory authorities and mandates underpinning Dam operations. CRSPA Section 1 defines the purposes, which are (numbers added): In order to initiate the comprehensive development of the water resources of the Upper Colorado River Basin, for the purposes, among others, of 1) regulating the flow of the Colorado River, 2) storing water for beneficial consumptive use, making it possible for the States of the Upper Basin to utilize, consistently with the provisions of the Colorado River Compact, the apportionments made to and among them in the Colorado River Compact and the Upper Colorado River Basin Compact, respectively, providing for the 3) reclamation of arid and semiarid land, 4) for the control of floods, and for the 5) generation of hydroelectric power, **as an incident** of the foregoing purposes.

   Note the use of the word INCIDENT. It is **not INCIDENTAL**. It is **not** secondary, lesser, subservient, nonexistent, or any other descriptor. **It is RELATED TO** the foregoing purposes. In federal reclamation law, "incident to" does not mean incidental in the sense of optional or subordinate; rather, it reflects that hydropower generation arises from and is integrally connected to the project's authorized storage and river regulation functions. Section 620 of the Act also references the hydropower authorization in the requirement "to construct, operate and maintain….dams, reservoirs, powerplants, transmission facilities and appurtenant works." The inclusion of powerplants and transmission facilities alongside dams and reservoirs demonstrates that hydropower is embedded within the statutory structure of the project. Accordingly, hydropower should be understood as an authorized and integrated project purpose when evaluating operational alternatives.

   The protection and clarity about hydropower is not limited to these two declarations. Section 7 requires that the GCD hydropower plants "be operated in conjunction with other Federal powerplants, present and potential, so as to produce the **greatest practicable amount of power and energy that can be sold at firm power and energy rates".** (Emphasis added)

2. **HYDROPOWER FEATURES ARE INFRASTRUCTURE.** Reclamation's projects and programs serve as the water *and power* infrastructure backbone of the American West. Throughout Post 2026 scoping, reference is made to "the system", which is comprised of both water and power infrastructure. The Purpose and Need, Scope and ultimate Operational guidelines and strategies must reflect the inextricable legal, economic and management linkage between water and power infrastructure and operations in the Colorado River Basin.

   Ensuring that "the system" encompasses water and power infrastructure and operations will ensure legal compliance, as well as being consistent with the "widely expressed themes" established during the scoping process:

   *Proactive management to improve system stability;
   *Addressing a broad range of future hydrologic and operating (including grid) conditions;
   *Minimizing system vulnerability; and,
   *Taking a holistic approach to Colorado River water and power management that focuses on sustainability for the Basin's population (over 5 million water and power customers in significantly underserved areas of the United States) and increases system (including grid) resiliency.

   The Courts have supported this "holistic approach." In 2009, the United States District Court, through the Grand Canyon Trust v. U.S. Bureau of Reclamation. case, states "These broadly-worded provisions (of the CSPA, 42 U.S.C. 620f, and section 1802(a)-(b) of the GCPA) impose on the Secretary of the Interior an obligation to balance many different interests in the operation of Glen Canyon Dam."[1] In a subsequent case, the Court continued to speak to hydropower as a statutorily authorized purpose of the CRSPA, citing 43 U.S.C 620f: "Here,

[1] 623 F.Supp.2d 1015, 1036 (D.Ariz. 2009)

Congress requires Dam operations to produce as much power and energy "to the greatest practicable amount" all while adhering to federal law. If Federal Defendants (the United States) do not adhere to the 1956 Colorado River Storage Project Act, they will violate the law." (Save the Colorado et al v. U.S.)[2]

CREDA recognizes that the States and Reclamation likely will develop additional agreements concurrently with the DEIS and FEIS process. CREDA urges continuation of a critical element of the Drought Contingency Plan (DCP), which reflects Congressional intent regarding hydropower production:

"2. Maintain the ability to generate hydropower at Glen Canyon Dam so as to protect:
a. Continued operation and maintenance of the CRSPA Initial Units and participating projects authorized under the 1956 Colorado River Storage Project Act, as amended ("CRSPA");
b. Continued implementation of environmental and other programs historically funded by CRSPA revenues that are beneficial to the Colorado River system;
c. Continued electrical service to power customers including municipalities, cooperatives, irrigation districts, federal and state agencies and Native American Tribes, and the continued functioning of the western Interconnected Bulk Electric System that extends from Mexico to Canada and from California to Kansas and Nebraska; and
d. Safety contingencies for nuclear power plant facilities within the Colorado River Basin. "

The need for stability is critical not only for water users and the public, but specifically for power users of the Colorado River system, many of whom are rural and tribal communities, and all of whom are long-term contractors for this important renewable resource that is critical to the energy security and clean energy transition taking place in the American West.

5. **THE BASIN FUND IS A KEY IMPACT INDICATOR.** As opposed to an element in the Dams and Power TA 15, a detailed description of the purposes and uses of the Upper Colorado River Basin Fund (Basin Fund) as authorized under the CRSPA, should be included in the body of the DEIS, as well as analyzed under each of the No Action and Action Alternatives. The Basin Fund is integral to the health and continued performance and existence of the CRSP as a federal multiple purpose project, and provides the funding necessary to operate and maintain the federal CRSP critical infrastructure facilities necessary in operation of the Colorado River system, specifically including the delivery of water. Basin Fund revenues are impacted by both energy production and drought. Less generation means that CRSP customers pay less into the Basin Fund for operation and maintenance. However, operation and maintenance costs are often not reduced, despite less generation (and therefore less revenue) being available. As a result, WAPA may have to raise its rates to cover the revenue shortfall. Higher rates to WAPA's wholesale purchasers translate to higher costs for the ultimate consumer. The analysis of all these factors (generation, revenues into the Basin Fund, frequency and magnitude of rate increases, market value) should be included for each DEIS alternative.

7. **HIGH FLOW EXPERIMENTS (HFEs) ARE JUST THAT – *EXPERIMENTS*.** They are not part of any elements of the Proposed Federal Action (page 1-5). They are not relevant in "protecting critical reservoir elevations," nor do they assist in the "storage of water". (1-5). HFEs are experiments and should be removed as an impact category under Geomorphology and Sediment (ES-34 and DEIS 3.5.2 page 3-61) and not used as an assumption in any resource analysis. Operations and storage functions are not the same as experiments. The Alternatives should not assume a specific "once every 4 years" discretionary decision as an assumption included in all alternatives. In addition to the Proposed Federal Action, HFEs are inconsistent with the Purpose and Need (1.3) and the Scope (1.5) of the DEIS. HFEs and the associated decision-making process are related to and impact hourly, daily and monthly Glen Canyon Dam operations, not annual water volumes as assessed in the DEIS. Finally, footnote 2 on page 15-16 states that "there are no anticipated impacts on scheduling from the alternative". If HFEs are included in Alternatives or analysis, this statement is incorrect. As noted on page 15-45 "Minimizing spillway releases maximizes water supply and power generation, while reducing wear and tear to the spillway structure". Maximizing water supply is an essential tenet of the DEIS.

[2] No. CV-19-08285-PCT-MTL, 2022 WL 18859975, at *26 (D.Ariz. Dec. 23, 2022)

As noted in TA 8, page 8-2 and 8-3, bug flow and cool mix experiments are correctly described as *experiments,* conducted under the 2016 LTEMP EIS and 2024 LTEMP SEIS, respectively, and are not determined or implemented under this DEIS. The HFE analyses in the DEIS appears to use 2016 LTEMP assumptions (see also comment on monthly volumes in Tables TA 5-5 and TA 5-6) that are not described in this DEIS, and that may change in future processes related to LTEMP. The conclusions regarding HFEs made in the DEIS could be misleading or incorrect, given that HFEs are implemented under a separate process. Lastly, as noted in TA 8.2.3, HFEs "are primarily a sediment management tool" and "do not use enough water to significantly affect Lake Powell's elevation." HFEs should be removed from the DEIS.

8. **INTERPRETATION AND USE OF BISHOP, ET AL (1987).** Technical Appendix 14 should be considered for revision as it tends to misconstrue the state of the science regarding *fluctuating* flows versus flow *levels.* in the context of angler and recreation satisfaction and tolerance levels. CREDA and the utility cooperating agencies in the LTEMP EIS process provided analysis indicating that the 1987 Bishop et al study was misinterpreted (May 14, 2016). Yet Bishop et al appears to continue to be relied on in regard to these preference issues. Rather, Stewart et al. (2000) should be relied upon as most current science underpinning the assumptions in the DEIS. Stewart, page 7: *Flow level, rather than fluctuating flow levels, was an issue for some stakeholders.* Stakeholders interested in fishing indicated preferences for lower flows than stakeholders concerned about recreational rafting. Accessibility and/or presence of certain fishing 'holes' was indicated as being best at lower flow levels, such as 10,000 - 12,000 cfs. Recreational rafting had both a broader range of flow levels and a higher range for '"best" conditions, such as 18,000 - 25,000 cfs. These results converged to a large extent with the optimum constant flow levels reported by Bishop et al. (1987) for anglers and rafters.

From the results of the stakeholder analysis, it was clear that flow-related issues had changed since the Bishop et al. (1987) study. *Daily fluctuations of flows was no longer a priority issue for most recreational use (Potochnik, 1998).* Although Glen Canyon anglers are probably most affected by the level of flow fluctuation, the reduced level of variability since the ROD of 1996 greatly reduced the adverse impacts of fluctuating flows on anglers. *In fact, by the classification used by Bishop et al, the current level of daily flow variability would not even be considered "fluctuating" since it varies by less than 10,000 cfs in a 24-hour period (Bishop et al., 1987, p. 187).* Whereas the previous study had emphasized user preferences and reaction to various fluctuating flow regimes, this study did not consider assessment of such preferences as being the top priority issues for stakeholders.

Thank you for considering CREDA's comments. We are available to discuss at any time.

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: CREDA Board
Andrea Travnicek - DOI
David Palumbo - USBR
Wayne Pullan - USBR
Tracey LeBeau - WAPA
Rodney Bailey - WAPA