



United States Department of the Interior

NATIONAL PARK SERVICE
Water Resources Division
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Fort Collins, Colorado 80525-5596

IN REPLY REFER TO:

March 29, 2002

L54(2380)
Colorado River Annual Operating Plan

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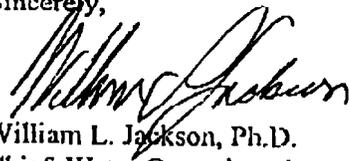
The National Park Service (NPS) appreciates the opportunity to comment on the Criteria for Coordinated Long-Range Operation of Colorado River Reservoirs (Operating Criteria) as part of the five-year Operating Criteria review process. Our understanding is that the Operating Criteria have remained unchanged since 1970. Understanding the delicate nature of the Operating Criteria review process, we nevertheless think this may be the appropriate time for modest revisions to the Operating Criteria to better reflect the role of reservoir operations in National Park protection and enhancement. The following proposed changes are offered for your consideration:

1. National Park protection should be one of the factors considered in development of the annual plan of operation (Sec. I.2), including provisions for any experimental flows necessary to meet the purposes of the Grand Canyon Protection Act.
2. The Grand Canyon Protection Act should be specifically mentioned as one of the relevant factors to be considered in the Operation of Upper Basin Reservoirs (Sec. II.3).
3. With provisions now in place for Beach Habitat Building Flows from Glen Canyon Dam, Section II.4 is no longer completely accurate as written. We propose the following rewording: "Annual releases will be made through the powerplant to the extent practicable except when above powerplant capacity releases are determined by the Secretary, after giving consideration to other applicable factors, to be necessary to meet the provisions of the Grand Canyon Protection Act."
4. Under the Operation of Lake Mead, we think the Interim Surplus Criteria should replace the language in Section III.3.b defining "Surplus." At least for the next 15 years, the Interim Surplus Criteria ROD defines the relevant factors that the Secretary must consider in determining whether water quantities greater than "normal" are available for pumping or release from Lake Mead.

The NPS understands that development of Shortage Criteria is not possible during the current five-year review of the Operating Criteria. However, we think it would be prudent for the Bureau of Reclamation to initiate a multi-stakeholder process to define shortage criteria for inclusion in future revisions of the Operation Criteria. Lastly, depending upon the results of the Glen Canyon Dam experimental flow program being developed in accordance with the Interim Surplus Criteria Record of Decision, it may be useful to future Operating Criteria reviews to initiate a multi-stakeholder process to review and recommend more specific hydrologic criteria to better address provisions of the Grand Canyon Protection Act.

In summary, the National Park Service thinks that some minor changes to the Operating Criteria are warranted during this 5-year review. We look forward to working with you to more specifically reflect the interests of park protection in the Operating Criteria. Please call (970-225-3503) if you have any questions.

Sincerely,



William L. Jackson, Ph.D.
Chief, Water Operations Branch

cc:

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