

experimental steady flows to benefit native fishes, subject to the results of a risk/benefit analysis now in progress.

RESPONSE: The preferred alternative provides for experimental steady flows through the Adaptive Management Program for the reasons put forth in the Biological Opinion.

COMMENT: Fund and implement immediately an Adaptive Management Program. This is the appropriate forum to address important issues. It is imperative that resource management rely on good science to monitor, and respond to possible adverse effects resulting from changes in dam operations.

RESPONSE: The preferred alternative provides for implementation of an Adaptive Management Program.

COMMENT: Interior Secretary Babbitt should issue a Record of Decision by December 31, 1995, and conduct an efficient and timely audit by the General Accounting Office as mandated by the Grand Canyon Protection Act.

RESPONSE: In compliance with the Grand Canyon Protection Act, Interior Secretary Babbitt could not issue the Record of Decision until considering the findings of the General Accounting Office. Those findings were issued on October 2, 1996.

OTHER COMMENTS: Another set of comments were received from municipalities and other power user groups. These letters made up about 3 percent of the total received and were essentially identical in content. Although the authors were not totally in agreement with the preferred alternative because of the reduction in peaking power, they believe it is a workable compromise. These letters characterized the final EIS as ". . . a model for resolving complex environmental issues among divergent interests." They also urged the government to protect the integrity of the process, resist efforts to overturn the FEIS, and allow the scientists' assessment to stand, in as much as the Adaptive Management Process will give Reclamation an opportunity to evaluate the effects of operational changes over time and make modifications according to scientific findings.

RESPONSE: While the preferred alternative may not satisfy all interests, Reclamation believes it is a workable compromise and meets the two criteria set out in the EIS for the reoperation of the dam, namely restoring downstream resources and maintaining hydropower capability and flexibility.

A letter of comment from the Environmental Protection Agency (EPA) indicates that EPA's comments on the draft EIS were adequately addressed in the final EIS. It also expresses their support for the preferred alternative.

Samples of the comment letters and cards, and a copy of EPA's comment letter are included as Attachment 2.

VI. ENVIRONMENTAL COMMITMENTS AND MONITORING

The following environmental and monitoring commitments will be carried out under the preferred alternative or any of the other restricted fluctuating or steady flow alternatives described in the final EIS. A detailed description of these commitments can be found on pages 33 - 43 of that document. All practicable means to avoid or minimize environmental harm from the preferred alternative have been adopted.

- 1. Adaptive Management:** This commitment includes the establishment of an Adaptive Management Workgroup, chartered in accordance with the Federal Advisory Committee Act; and development of a long-term monitoring, research, and experimental program which could result in some additional operational changes. However, any operational changes will be carried out in compliance with NEPA.
- 2. Monitoring and Protection of Cultural Resources:** Cultural sites in Glen and Grand Canyons include prehistoric and historic sites and Native American traditional use and sacred sites. Some of these sites may erode in the future under any EIS alternative, including the no action alternative. Reclamation and the National Park Service, in consultation with Native American Tribes, will develop and implement a long-term monitoring program for these sites. Any necessary mitigation will be carried out according to a programmatic agreement written in compliance with the National Historic Preservation Act. This agreement is included as Attachment 5 in the final EIS.
- 3. Flood Frequency Reduction Measures:** Under this commitment, the frequency of unanticipated floods in excess of 45,000 cubic feet per second will be reduced to an average of once in 100 years. This will be accomplished initially through the Annual Operating Plan process and eventually by raising the height of the spillway gates at Glen Canyon Dam 4.5 feet.
- 4. Beach/Habitat-Building Flows:** Under certain conditions, steady flows in excess of a given alternative's maximum will be scheduled in the spring for periods ranging from 1 to 2 weeks. Scheduling, duration, and flow magnitude will be recommended by the Adaptive Management Work Group and scheduled through the Annual Operating Plan process. The objectives of these flows are to deposit sediment at high elevations, re-form backwater channels, deposit nutrients, restore some of the natural system dynamics along the river corridor, and help the National Park Service manage riparian habitats.
- 5. New Population of Humpback Chub:** In consultation with the U.S. Fish and Wildlife Service (FWS), National Park Service, and Arizona Game and Fish Department (AGFD), Reclamation will make every effort (through funding, facilitating, and technical support) to ensure that a new population of humpback chub is established in the mainstem or one or more of the tributaries within Grand Canyon.
- 6. Further Study of Selective Withdrawal:** Reclamation will aggressively pursue and support research on the effects of multilevel intake structures at Glen Canyon Dam and use the results of this research to decide whether or not to pursue construction. FWS, in consultation with AGFD,

will be responsible for recommending to Reclamation whether or not selective withdrawal should be implemented at Glen Canyon Dam. Reclamation will be responsible for design, NEPA compliance, permits, construction, operation, and maintenance.

7. Emergency Exception Criteria: Operating criteria have been established to allow the Western Area Power Administration to respond to various emergency situations in accordance with their obligations to the North American Electric Reliability Council. This commitment also provides for exceptions to a given alternative's operating criteria during search and rescue situations, special studies and monitoring, dam and power plant maintenance, and spinning reserves.

VII. BASIS FOR DECISION

The goal of selecting a preferred alternative was not to maximize benefits for the most resources, but rather to find an alternative dam operating plan that would permit recovery and long-term sustainability of downstream resources while limiting hydropower capability and flexibility only to the extent necessary to achieve recovery and long-term sustainability.

Based on the impact analysis described in the final EIS, three of the alternatives are considered to be environmentally preferable. They are: the Moderate Fluctuating Flow Alternative, the Modified Low Fluctuating Flow Alternative, and the Seasonally Adjusted Steady-Flow Alternative. Modified Low Fluctuating Flow is selected for implementation because it satisfies the critical needs for sediment resources and some of the habitat needs of native fish, benefits the remaining resources, and allows for future hydropower flexibility, although there would be moderate to potentially major adverse impacts on power operations and possible decreases in long-term firm power marketing. Nearly all downstream resources are dependent to some extent on the sediment resource. This alternative meets the critical requirements of the sediment resource by restoring some of the pre-dam variability through floods and by providing a long-term balance between the supply of sand from Grand Canyon tributaries and the sand-transport capacity of the river. This, in turn, benefits the maintenance of habitat. The critical requirements for native fish are met by pursuing a strategy of warming releases from Glen Canyon Dam, enhancing the sediment resource, and substantially limiting the daily flow fluctuations.

The decision process for selecting the preferred alternative for the EIS followed a repetitive sequence of comparisons of effects on downstream resources resulting from each alternative. Alternatives resulting in unacceptable adverse effects on resources (such as long-term loss of sandbars leading to the destruction of cultural resource sites and wildlife habitat) were eliminated from further comparisons. Comparisons continued until existing data were no longer available to support assumed benefits.

All resources were evaluated in terms of both positive and adverse effects from proposed alternatives. Once it was determined that all alternatives would deliver at least 8.23 million acre feet of water annually, water supply played a minor role in subsequent resource evaluations. (One of the objectives of the "Criteria for Coordinated Long-Range Operation of Colorado River Reservoirs" is a minimum annual release of 8.23 million acre feet of water from Glen Canyon

Dam.) The alternatives covered a range of possible dam operations from maximum utilization of peaking power capabilities with large daily changes in downstream river levels (Maximum Powerplant Capacity Alternative) to the Year-Round Steady Flow Alternative that would have eliminated all river fluctuations and peaking power capabilities. Within this range, the Maximum Powerplant Capacity, No Action, and High Fluctuating Flow alternatives were eliminated from consideration as the preferred alternative because they would not meet the first criterion of resource recovery and long-term sustainability. Data indicated that while beneficial to hydropower production, these alternatives would either increase or maintain conditions that resulted in adverse impacts to downstream resources under no action. For example, under these alternatives, the sediment resource would not likely be maintained over the long-term.

At the other end of the range, the Year-Round Steady Flow Alternative was also eliminated from consideration as the preferred alternative. This alternative would result in the greatest storage of sand within the river channel, the lowest elevation sandbars, the largest potential expansion of riparian vegetation, and the highest white-water boating safety benefits. However, it would not provide the variability on which the natural processes of the Grand Canyon are dependent (e.g. beach building, unvegetated sandbars, and backwater habitats). A completely stable flow regime would encourage the growth of vegetation thereby reducing bare-sand openings and patches of emergent marsh vegetation. This would limit beach camping and reduce the habitat value of these sites. With respect to other resources, this alternative did not provide any benefits beyond those already provided by other alternatives. Steady flows could also increase the interactions between native and non-native fish by intensifying competition and predation by non-natives on native fish. Such interactions would reach a level of concern under steady flows. Finally, this alternative would have major adverse impacts on hydropower (power operations and marketing).

The Existing Monthly Volume Steady Flow Alternative was eliminated from selection as the preferred alternative for reasons similar to those discussed above for the Year-Round Steady Flow Alternative.

Although the Interim Low Fluctuating Flow Alternative performed well over the interim period (August 1991 to the present), long-term implementation of this alternative would not restore some of the pre-dam variability in the natural system. The selected Modified Low Fluctuating Flow Alternative is an improved version of the Interim Low Fluctuating Flow Alternative because it would provide for some pre-dam variability through habitat maintenance flows.

The three remaining alternatives--the Moderate Fluctuating, Modified Low Fluctuating, and Seasonally Adjusted Steady Flow Alternatives-- provide similar benefits to most downstream resources (e.g., vegetation, terrestrial wildlife, and cultural resources) with respect to increased protection or improvement of those resources (see Table II-7 in the EIS). The Moderate Fluctuating Flow Alternative provided only minor benefits to native fish over no action conditions because of the relative similarity in flow fluctuations; and the benefits from the Seasonally Adjusted Steady Flow Alternative were uncertain given the improvement in habitat conditions for non-native fish this alternative would provide. Seasonally adjusted steady flows also would create conditions significantly different from those under which the current aquatic ecosystem has developed in the last 30 years and would adversely affect hydropower to a greater extent than the

other two alternatives. The Modified Low Fluctuating Flow could substantially improve the aquatic food base and benefit native and non-native fish. The potential exists for a minor increase in the native fish population.

Although the Moderate Fluctuating, Modified Low Fluctuating, and Seasonally Adjusted Steady Flow Alternatives provide similar benefits to most downstream resources, the Modified Low Fluctuating Flow Alternative was selected as the preferred alternative because it would provide the most benefits with respect to the original selection criteria, given existing information. This alternative would create conditions that promote the protection and improvement of downstream resources while maintaining some flexibility in hydropower production. Although there would be a significant loss of hydropower benefits due to the selection of the preferred alternative (between \$15.1 and \$44.2 million annually) a recently completed non-use value study conducted under the Glen Canyon Environmental Studies indicates that the American people are willing to pay much more than this loss to maintain a healthy ecosystem in the Grand Canyon. The results of this non-use value study are summarized in Attachment 3 of the ROD.

The results of a General Accounting Office (GAO) audit mandated by the Grand Canyon Protection Act are in Attachment 4 of the ROD. This audit generally concludes that Reclamation used appropriate methodologies and the best available information in determining the potential impact of various dam flow alternatives on important resources. However, GAO identified some shortcomings in the application of certain methodologies and data, particularly with respect to the hydropower analysis. Reclamation's assumptions do not explicitly include the mitigating effect of higher electricity prices on electricity demand (price elasticity). GAO also determined that Reclamation's assumptions about natural gas prices were relatively high and that two computational errors were made during the third phase of the power analysis. According to GAO, these limitations suggest that the estimated economic impacts for power are subject to uncertainty. GAO also found limitations with some of the data used for impact analysis. Certain data was incomplete or outdated, particularly data used in assessing the economic impact of alternative flows on recreational activities. Nevertheless, the National Research Council peer reviewed both the Glen Canyon Environmental Studies and the EIS, and generally found the analysis to be adequate. The GAO audit concluded that these shortcomings and limitations are not significant and would not likely alter the findings with respect to the preferred alternative and usefulness of the document in the decision-making process. The audit also determined that most of the key parties (83 percent of respondents) support Reclamation's preferred alternative for dam operations, although some concerns remain.

ATTACHMENT 1.

Specific peer reviewed sediment studies:

Beus, S. and C. Avery. 1993. The influence of variable discharge regimes on Colorado River sand bars below Glen Canyon Dam. Glen Canyon Environmental Studies, Report PHY0101, Chapters 1 through 7. Northern Arizona University, Flagstaff, AZ

Beus, S., M.A. Kaplinski, J.E. Hazel, L. A. Tedrow, and L. H. Kearsley. 1995. Monitoring the effects of interim flows from Glen Canyon Dam on sand bar dynamics and campsite size in the Colorado River corridor, Grand Canyon National Park, AZ. Glen Canyon Environmental Studies, Report PHY 0112. Northern Arizona University, Flagstaff, AZ

Budhu, M and R. Gobin. 1994. Monitoring of sand bar instability during the interim flows: a seepage erosion approach. Glen Canyon Environmental Studies, Report PHY 0400. University of Arizona, Tucson, AZ

Carpenter, M., R. Carruth, Fink, D. Boling, and B. Cluer. 1995. Hydrogeology of sand bars 43.1 and 172.3L and the implications on flow alternatives along the Colorado River in the Grand Canyon. Glen Canyon Environmental Studies, Report PHY 0805. U.S. Geological Survey, Tucson, AZ

Cluer, B. 1993. Annual Report. Sediment mobility within eddies and the relationship to rapid erosion events. Glen Canyon Environmental Studies, Report PHY 011. National Park Service, Ft. Collins, CO

Cluer, B. and L. Dexter. 1994. An evaluation of the effects of the interim flows from Glen Canyon Dam on the daily change of beach area in Grand Canyon, AZ. Glen Canyon Environmental Studies, Report PHY 0109. Northern Arizona University, Flagstaff, AZ

Nelson, J., N. Andrews, and J. MacDonald. 1993. Movement and deposition of sediments from the main channel to the eddies of the Colorado River in the Grand Canyon. Glen Canyon Environmental Studies, Report PHY 0800. U.S. Geological Survey, Boulder, CO

Randle, T.J., R.I. Strand, and A. Streifel. 1993. Engineering and environmental considerations of Grand Canyon sediment management. In: Engineering Solutions to Environmental Challenges: Thirteenth Annual USCOLD Lecture, Chattanooga, TN. U.S. Committee on Large Dams, Denver, CO.

Schmidt, J. 1994. Development of a monitoring program of sediment storage changes in alluvial banks and bars, Colorado River, Grand Canyon, AZ. Glen Canyon Environmental Studies, Report PHY 0401. Utah State University.

Smith, J. and S. Wiele. 1994. Draft report. A one-dimensional unsteady model of discharge waves

in the Colorado River through the Grand Canyon. Glen Canyon Environmental Studies, Report PHY 0805. U.S. Geological Survey, Boulder, CO

Werrell, W., R. Ingliss, and L. Martin. 1993. Beach face erosion in Grand Canyon National Park: A response to ground water seepage during fluctuating flow releases from Glen Canyon Dam. Glen Canyon Environmental Studies, Report PHY 0101, Chapter 4 in The influence of variable discharge regimes on Colorado River sandbars below Glen Canyon Dam, Report PHY 0101. National Park Service, Ft. Collins, CO