

# INDIVIDUALS

1. G. Howard Abplanalp
2. Lew Albright
3. Mark Allen
4. John and Mickey Allen
5. Dick Apedale
6. Justin Barker
7. Lynn Barlow
8. Nancy Bostick-Ebbert
9. Allen Brisk
10. Alan Bronston
11. Michael Brown
12. Bob Brownlee
13. Scott Brunk
14. Ted Butterfield
15. René Buzarde
16. Bryan Campbell
17. Jay P. Carlson
18. Mel Cisneros
19. Randall M. Connett
20. Robert W. Day
21. James DeSpain
22. Frank Doyle
23. Paul J. Ebbert
24. Bryan Eldredge
25. Jeff Erkenbeck
26. Kurt Finlayson
27. Richard Fitzgerald
28. Robert Freestone
29. Bruce Gibbs
30. Kerry M. Gubits
31. J. Dean Hansen
32. Virginia L. Harrington
33. Corey Harris
34. Craig W. Hauser
35. Rick Hayes
36. Jeffrey Himsl
37. Jack Hunter
38. Dale Huskey
39. Bob Johnston
40. Don E. Jorgensen
41. Dora J. Jorgensen
42. Wade Kafkaloff
43. Bruce Kautz
44. Ted E. Kulongoski
45. Heather Kuoppamaki
46. Scott A. Marshall
47. Jeff Martin
48. Jerry McGarey
49. Patrick Mehle
50. Norman Miller
51. Richard L. Mimms
52. Arthur D. Moeller
53. Mark Naccarato
54. Sean P. O'Connor
55. Mauria Pappagallo
56. Edward Park
57. Lex Patterson
58. Chet Preston
59. Tom Prettyman
60. Jairo Ramirez
61. Robert Rutkowski
62. Peter Sagara
63. Cris and Amanda Shiffler
64. Jay Smith
65. Les Smith
66. Kent Spittler
67. Wayne Stewart
68. Steven Strong
69. Jeffrey W. Talus
70. John I. Taylor
71. James W. Thompson
72. Phil Waters
73. Bryan Weight
74. Jim Wilson
75. Marshall Wilson
76. Crista Worthy

Mr. Peter Crookston  
Flaming Gorge EIS Manager  
PRO-774 Bureau of Reclamation  
Provo Area Office  
302 E. 1860 So. Provo UT  
84606-7317

November 14, 2004

Dear Sir,

- After reading the newspaper article in the Vernal Express dated 11-4-04, I would like to submit
- 1a my comments: I fully support Dr. Steven Romney's concerns of creating excess flood plain to promote increased endangered fish populations - I witnessed the hard work Dr. Romney and his crew did this year to keep mosquito populations in check as they were continually checking and eradicating larvae throughout the area.
- 1b It also doesn't make sense to flood usable fields, irrigation systems & to lose power generation when the endangered fish are
- 1c making a comeback anyway. There's a good chance the youpa river will provide an extremely
- 1d large flow this year & provide some of the

benefits you are hoping for. I think the desire to increase the endangered species is one we all support.

I also feel that we need to increase the storage capacity of the Green River at higher elevations such as Fruitville & Flaming Gorge for future use since we've been experiencing a 6 year drought. Water is too valuable a commodity to use for just one reason.

Respectfully,

Ottavard Olymualf

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## **1. G. HOWARD ABPLANALP**

### **1a**

Please see responses to the Uintah Mosquito Abatement District letter 6 and public hearing speaker 9 (Dr. Steve Romney).

### **1b**

Under either alternative, higher flows will inundate the historic flood plain. Any improvements by landowners in the flood plain have always been at the landowners' risk.

### **1c**

There are few data suggesting that the four endangered species are making a comeback; in fact, most data suggest that populations of four species are either stable at dangerously low levels or declining in some cases. At best, all four species currently exist at diminished population levels which preclude removing them from the Endangered Species Act (ESA) or improving their

ESA status. See the Recovery Program website <<http://www.r6.fws.gov/crrip/rea.htm>> or call the Recovery Program at 303-969-7322, ext. 227 for more information.

### **1d**

As stated in the EIS, Yampa River flows have a greater influence on the flows in Reaches 2 and 3, and the Action Alternative takes this into account.

### **1e**

Comment noted; increasing storage capacity is outside the scope of the EIS.

### **1f**

Reclamation's intent is to continue balancing the needs of all resources when making operational decisions and not focus on just one resource. Reclamation would continue this practice under both the Action and No Action Alternatives.

**From:** "lew" <albrightlr@iwvisp.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 5:27 PM  
**Subject:** Water Flows on the Green

Dear Mr.. Crookston,

I have been fishing the Green River for at least 12 years. The last 6 years I have fished it twice a year. This last year, especially October, the flows really disrupted the fishing. It seems that the flows were changed during prime time, during the middle of the day. It was the worst fishing that we have ever had on the Green. We spend over a \$1000.00 to the Utah merchants for every trip that we make but if the flows stay like they are, we plan on fishing in Oregon and Colorado. We do love the Green River fishery, but why fish it if the flows keep changing during the day and cutting hours of fishing out of our day. It is very discouraging. It wouldn't it be better for everyone if the flows were changed during the late evening and not during the day when the river is full of anglers, boats and rafters?? It is also a safety hazard because many wade fishers cross over to the opposite bank to fish and when the water rises it is almost impossible to get back, unless you are a good wader. I hope that an agreement can be reached that will not disrupt the fishing during prime time.

Thank you for your support.  
Lew Albright

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## **2. LEW ALBRIGHT**

### **2a and 2b**

Fluctuating releases during the day have been the normal operations of the powerplant since it began power generation 40 years ago and would continue under either alternative. The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day.

### **2c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed 40 years ago, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38.

**From:** "Mark Allen" <markallen2@qwest.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 7:28 PM  
**Subject:** Green River Problems

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317  
801-379-1152  
801-379-1159 FAX

Mr. Crookston,

3a I have been fishing on the Green River for many years. There are a number of things which are of grave concern to me. The past several times I have been fishing out there I catch many fish that seem to have health issues. I am not sure of all the things that disrupt the feeding cycles of the fish, but I think the change of flows in a quick manner does in fact impact the fish in negative fashion.

3b It is difficult to know if I wade to the far side of the river if I will be stranded by high releases or if I will be able to safely return at the end of a fishing day.

3c The reputation of the Green River as being a world class fishery has come into question when I find the disruption that high water brings to my personal experience. If water flows need to be ramped up I would suggest this happen from midnight until 4am, so things can settle back down during the day hours. If the flows are ramped up during the night the electricity generated could be sold to those in the East at a premium.

3e Please consider the issues which affect the fishing, which result in economic gains or losses to the area as they are directly tied to individuals fishing experiences and word of mouth as to how the fishery is doing. It has been quite sometime since fishing has been splendid. I would guess that if an environmental and biological study were done on the disruption of feed in the river channels due to rapid increase of water flows, we would find that much of the food sources for fish are being blasted downstream and hence those fish that remain have undue competition, this results in marginally healthy fish.

3g I would like to get an update as to the solutions you deem appropriate for this wonderful resource. Please protect it. As a former river guide in the Grand Canyon we experienced dramatic flow changes. There is great safety issues here that need to be considered. High water and swift currents can consume lives. It is common sense that if flows are to be increased that it is done prudently and at a time which presents the lowest opportunity to affect fisherman frequenting the area.

Thank you,

Mark Allen  
1729 North 80 West  
Orem, Utah 84057



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### **3. MARK ALLEN**

#### **3a and 3f**

Comment noted.

#### **3b and 3g**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed 40 years ago, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

#### **3c**

Fluctuating releases during the day have been the normal operations of the powerplant since it began power generation 40 years ago and would continue under either alternative. The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the

day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day.

#### **3d**

Electricity in the East is provided by separate transmission systems that are not connected or synchronized with the Western network, so the power could not be sent directly to the East.

#### **3e**

The EIS acknowledges the possibility of both positive and negative effects under differing conditions if the Action Alternative is implemented. It should be noted that the nature and timing of fluctuating releases, and other daily operational details, would remain substantially the same under either the Action or No Action Alternative. The trout fishery was established 40 years ago within the context and limitations of dam operations; and over time, certain operational changes have benefited the trout fishery. Please see response to individual letter 38.

**From:** "Mary Allen" <jackpinesavageco@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 11:52 PM  
**Subject:** Increased Flows from Flaming Gorge Dam

**4a** To whom it may concern:  
We are residents of Rangely, and take much pleasure from the rivers of Dinosaur National Monument.  
We strongly support the Action Alternative.

John and Mickey Allen  
Rangely, CO

Mary Allen  
jackpinesavageco@earthlink.net  
Why Wait? Move to EarthLink.

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## **4. JOHN AND MICKEY ALLEN**

### **4a**

Comment noted.

**From:** "Dick" <flyfishing@readytek.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 6:47 PM  
**Subject:** Operation of Flaming Gorge Dam

- 5a** I support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing. An issue of safety, wading fishermen's safety is affected negatively when river flows change abruptly during peak fishing hours of the day.
- 5b**

Please take in consideration my notes

Thank you

Dick Apedaile

flyfishing@readytek.net

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## **5. DICK APEDALLE**

### **5a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

### **5b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.

**From:** <Jlbarker5@cs.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Tue, Nov 23, 2004 11:48 PM  
**Subject:** Flaming Gorge Dam Flows

Mr. Peter Crookston

Flaming Gorge Environmental Impact Statement Manager

PRO-774

Bureau of Reclamation, Provo Area Office

302 East 1860 South

Provo, UT. 84606-7317

801-379-1152

I am writing in regard to the changing flows on the Green River below Flaming Gorge Dam this last summer. I come to the area about every other month to fish and stay in Vernal for the duration of the trip. I usually come with at least one friend.

I wade fish on the Green and the flows are particularly important to me.

6a Changing the water flows during the day is a safety issue for many fishermen that wade like myself. I know the river changes and plan accordingly, but the river is constantly full of newcomers and they are rarely ready for a large increase in the amount of water being let out of the dam.

6b I support the single daily peak hump restriction, but it could be done at a time when it would not impact the fishing. The daily changes this last summer killed the fishing during most of the day. It takes the fish a while after the increased flow to calm down and begin feeding. By this time, the flow was decreased and the fishing was again thrown off. I know the Green River is a national destination river for fly fishermen and this summer was a disappointing experience for many of them. We need to keep the flows as constant as possible during the day in order to maintain the excellent fishing and keep tourist dollars flowing in to this region. Thank you for your time.

Justin Barker  
1911 W 800 N  
Pleasant Grove, UT 84062  
801-785-7811

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## **6. JUSTIN BARKER**

### **6a**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in

the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **6b**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** "Lynn" <lynn@kathyquilts.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 10:58 PM  
**Subject:** Power generation impact on Green River fishing

To: Peter Crookston  
From: Lynn Barlow

Dear Sir,

I would like to mention to you how I enjoy visiting the Green River, especially the A section below the Flaming Gorge Dam. I have visited numerous times and had different experiences each time. Out of all the places I like to fish, the Green River can be the most fun and the most frustrating. There have been times when the raising of the river has severely affected the fish. Since I live about 4 hours away from Dutch John, in Brigham City, Utah, the time investment is quite significant. When I visit the Green River I am rewarded with the beauty and awesome canyon view as I float serenely down the river. The opportunity to catch fish makes the trip all the more enjoyable.

- 7a** It is come to my attention that the power generation can occur during time periods when fishing will not be affected. This could make for more enjoyable trips to the river as well as safer fishing.
- 7b** Not knowing whether the river will be raised or lowered without warning really is a cause for concern. It is my hope that a time frame can be reached for power generation that will not affect the fishing.

Better fishing conditions will affect the amount of dollars for local merchants as well as for Utah in general.

I thank you for reading this message,

Lynn Barlow



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## **7. LYNN BARLOW**

### **7a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative.

### **7b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at

the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.

**From:** "Nancy Bostick-Ebbert" <nancyb@sbt.net.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 9:39 AM  
**Subject:** Comment Addendum

Below you will find a duplicate comment to which I have added my contact information that I inadvertently left off earlier.

Thanks,

Nancy Bostick-Ebbert

To Whom it May Concern:

**8a** My name is Nancy Bostick-Ebbert. I am a fifth generation Utah resident and was born and raised in Vernal. I very strongly support the action alternative for increasing flows every 10 years on the Green River below the dam. I think it is critical that we do everything we can to mimic conditions favorable for the endangered species of fish in the Colorado River drainage. In addition, these releases help improve the riparian ecosystems along the river and provide better habitat for the birds and animals who inhabit those environs.

*I appreciate the opportunity to comment on this and encourage you to make a decision based on good science not fears and misinformation.*

Sincerely Yours,

Nancy Bostick-Ebbert  
1 North 2500 West  
Vernal, UT 84078  
(435) 781-1518

"If you want another to adopt your beliefs, you must first become someone they wish to emulate..."

---nancy bostick-ebbert---  
nancyb@sbt.net

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## **8. NANCY BOSTICK-EBBERT**

**8a**

Comment noted.

**From:** Allen Brisk <Allen.Brisk@paccoast.com>  
**To:** "fgeis@uc.usbr.gov" <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 5:06 PM  
**Subject:** Green River

I am a 64 year old man who has fished the Green River for the past 25 years. I take an average of 4 guided trips per year. I have fished when the water is high and when it is low. I have fished and been caught in high water when the water levels have fluctuated. I have seen trees and debris washed downstream when the water is increased.

In all cases when the level increases or decreases during normal fishing hours, the experience decreases and is not so enjoyable.

**9a** Please do not change the flow pattern. Increase the volume at night if more water is required.

From a financial point, my Green river float trips would cease and so would the lodging.

I do not necessarily want to go to Montana to fish.

Please.

Allen Brisk allen.brisk@paccoast.com

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## **9. ALLEN BRISK**

### **9a**

The issue of daily fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** "Bronston, Alan" <Alan.Bronston@USFOOD.COM>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 10:57 AM

Mr. Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317  
801-379-1152

Dear Mr. Crookston,

I am writing this note in regard to the review of the Environmental Impact Statement of the Flaming Gorge Dam that is underway. I would like to comment on how the flows were managed this last year from two separate perspectives.

10a First, let me say that I live in Utah, do business in Utah, recreate in Utah, and do as much as possible of all three at Flaming Gorge. Flaming Gorge has not only been the best place in the west for a top quality fishing experience, it is also the most convenient. This year, however, with the daily rise and fall of the water levels; the fishing was so suppressed that it was hardly worth the effort and expense to come, other than for the scenery. It is inevitable that if the flows are managed in the same way in the future, I, and others like me, will have no alternative than to find other places to go. This would be a real shame since Flaming Gorge by all rights ought to stand alone as the prime fishing destination in the United States, if not the world. The impact on the local economy cannot be overstated.

10b  
10c Secondly, this is a serious safety hazard. Let me relate an experience that I myself had this summer, which I understand was not unique from what others have told me. We launched just after midday from the put in below the dam. On board my drift boat was a young child and older man. Just after the second or third bend we encountered a wading fisherman who had become stranded in the middle of the river when the levels began to rise. He was very close to losing his footing when we came along. We had no choice but to attempt to rescue him, of course. However, due to where he was, the current, and our having to ferry across to get to him, in the end the only way we could get him was for him to grasp hold of the upriver side of the boat by the oarlock. This crippled the maneuverability of the boat since I no longer had the use of one oar, and the additional weight and dragging effect to the upriver side of the boat nearly swamped us. This was not an event I would enjoy repeating.

I hope that when the Environmental Impact Statement is complete it will be discovered that there is a way to accomplish whatever it is that is required from the dam without having such a dramatic impact on those who are trying to enjoy the river.

Thank You,

Alan Bronston  
Territory Manager

888-295-4803 Ext. 502  
435-901-3138 Mobile  
alan.bronston@usfood.com

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## **10. ALAN BRONSTON**

### **10a**

The issue of daily fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative.

### **10b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

### **10c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is

prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.



**From:** "Michael Brown" <mike\_utdairy@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 8:36 AM  
**Subject:** Daily Peak Restriction

Dear Mr. Crookston,

- 11a** As a frequent visitor to the Flaming Gorge recreation area, primarily to fish the Green River below the dam, I would like to voice my support of a single daily peak hump restriction, but I believe its timing should be in a manner that it has no impact on river recreation activities, especially fishing.

I know I am preaching to the choir when I talk about the revenue generated by those who fish the river, but I think the drastic change in flows has the possibility of reducing that revenue. I know my frequency has decreased since I was stranded on the West side of the river during a high flow.

- 11b** Again, I understand the need to maximize the usefulness of the dam, but not at the expense of the purpose for which the dam was authorized.

Respectfully,

Mike Brown  
Riverton, Utah

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## **11. MICHAEL BROWN**

### **11a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **11b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power

generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** "Bob Brownlee" <brwnle@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 8:27 PM  
**Subject:** Flaming Gorge Discharge Rates

- 12a Dear Mr. Crookston, I am writing to encourage use of the single daily peak hump restriction but in a manner which does not impact fishermen. I have fished the Green River extensively and have been negatively surprised by the flow changes more than once. Not only does the flow change turn the fish bite off for a time but it also has some potentially dangerous consequences. I have been trapped twice by rising flows and had to fill my waders to reach shore when I realized what was happening. People who are not aware of the possible flow changes could be trapped on a shallow bar for an extended time, or worse.
- 12b If there are ways of preventing this potential I would certainly like to encourage the consideration of those actions.

Thanks for your consideration. *Bob Brownlee, Golden, Colorado.*

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## **12. BOB BROWNLEE**

### **12a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

### **12b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.

**From:** "scott brunk" <bighorn1478@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 12:24 PM  
**Subject:** Flaming Gorge water flows.

- 13a I have found that the fishing experience at Flaming Gorge can be dangerous as well as frustrating do to the peaks and valleys of water releases for power generation. Please try to do a better job of managing the flows.

Scott Brunk  
303-665-3261

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### **13. SCOTT BRUNK**

#### **13a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** "Ted Butterfield" <buttuhs@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 6:10 PM  
**Subject:** In regards to flaming gorge dam.

- 14a** I'm writing in regards to the flow changes at flaming gorge in order to produce electricity. I believe that a constant flow is preferable to fluctuating flows. This is due to experiences which I had in early July of this year while fishing the Green just below flaming gorge. The fishing was severely affected by the flow changes and I know of several men on that day who were stranded on the other side of the river as they did not know that the flows would rise later in the day. One man even lost his driftboat when the river rose and picked it up off the rocks. This causes personal loss and distasteful memories of what could have been a long anticipated trip to a one off America's top rivers. Therefore I support the single daily peak
- 14b** hump restriction, and hope that the timing of the peaked flow will be such that it will not disturb fishing or
- 14c** place fishermen in needless danger. Thank you for your time.

Ted Butterfield  
buttuhs@hotmail.com

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## **14. TED BUTTERFIELD**

### **14a and 14b**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **14c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river

warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.



**From:** "Renee Buzarde" <rbuzarde@union-tel.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Thu, Nov 4, 2004 2:26 PM  
**Subject:** Flaming Gorge EIS

I would like to join Dr. Romney in opposition to changes in operations of the Flaming Gorge Dam. I live near the dam and love this area and hope we can protect it.

- 15a** With the huge threat of the West Nile Virus and possible danger to our fishing industry, I strongly oppose proposed changes in water flow.
- 15b** We need to protect the trout in the Green River.

Please leave things the way they are.  
A concerned citizen of Daggett/Uintah County.

Reneé Henderson Buzarde  
670 Flaming Gorge Acres  
Dutch John, Utah 84023  
rbuzarde@union-tel.com

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**15. RENEÉ HENDERSON  
BUZARDE**

**15a**

The EIS acknowledges (section 4.13.3.) that the proposed action will increase mosquito habitat to the greatest extent in Reach 1, and to a lesser extent in Reach 2. Based on our analysis, Reclamation believes that the increased risk of diseases such as West Nile virus, compared to other potential vectors for the disease, including standing water on private

property closer to population centers, is so small that it is insignificant. We do not anticipate a linkage between Reclamation's proposed action and a threat from West Nile virus or other mosquito-borne diseases.

**15b**

Long-term negative effects to the tailwater trout fishery are not expected under the Action Alternative.

**From:** "BRYAN CAMPBELL" <BCAMPBELL@wmccat.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 5:19 PM  
**Subject:** flaming gorge dam...

It has come to my attention that the Bureau of Reclamation is undergoing a Draft Environmental Statement on the Operation of Flaming Gorge Dam and asking for comments. I was only able to fish my favorite river, the Green River twice this summer. Both times the trip was dramatically effected by fluctuating flows coming from the dam. On the first occasion, our group crossed the river early in the morning, and we underestimated the effect of the increase in flow, that evening we tried several times to cross back over, but it was impossible. Finally we had to return to little hole to cross where two of us took water over the top of our waders, and a younger member of our group barely made it across. On the second occasion, we left very early in the morning to make it to the river in time to fish, we were having a great day until again the flow increased and the fishing came to a screeching halt forcing us to leave earlier than we had hoped. I understand the purpose of the dam, but I also feel that dramatic fluctuations during daylight hours not only affects fishing, but affects the safety of people on the river. Please change the fluctuation times to a time when people aren't negatively affected.

16a

16b

Thank you,  
Bryan Campbell

**CC:** fishgreenriver <dbreer@union-tel.com>

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## **16. BRYAN CAMPBELL**

### **16a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **16b**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the

releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 below.

**FGEIS ZZ401 PRO**

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**From:** "Jay Carlson" <jpcvail@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** 11/15/2004 8:49 AM

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Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317  
801-379-1152  
801-379-1159 FAX

I would like to share something that frustrates many of us who fish below dams especially the Flaming Gorge Dam is the erratic way flows can suddenly jump up and down while we are fishing. This can often disrupts water quality and upset the fish for set periods of time. The end result

- 17a** is a spoiling of our fishing day. know this is occurring, I would like to mention how my fishing dollars impact local businesses and Utahs overall economy. I support the single daily peakhump restriction, but its timing should bein a manner that it has no impacts on river  
**17b** recreation activities, especiallyfishing. I would also like to address the issues of safety, a waders safety is effectednegatively when river  
**17c** flows change abruptly.
- 17d** You have the ability to do the power generation flows in non-fishing hours or maintain a slightly higher steady flow that generates the same amount of electricity.

Please rectify this situation.

Jay P. Carlson  
[jpcvail@msn.com](mailto:jpcvail@msn.com)

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## **17. JAY P. CARLSON**

### **17a**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

### **17b**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

### **17c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the

fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **17d**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 below.

**From:** "mel cisneros" <mel\_cisneros@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 5:06 PM  
**Subject:** Green River Flows

**18a** I support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing.  
Is their not a way to meet the needs for power in a maner allowing both sportsman and consumers to enjoy their day?

Mel Cisneros

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## **18. MEL CISNEROS**

### **18a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.



**From:** "Connett, Randy" <Randy.Connett@VECO.COM>  
**To:** "fgeis@uc.usbr.gov" <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 7:29 AM  
**Subject:** Flaming Gorge Environmental Impact Statement Comments

Mr Peter Crookston

Dear Sir:

**19a** I am forwarding my comments regarding the desire of the operators of Flaming Gorge Dam to respond to peak power requirements by varying the flows from Flaming Gorge Reservoir. I am very concerned about the impact that this has on this world class fishery, and the safety of those who are wading the river.

**19b** Sudden increases in flow can lead to unobservant or unfamiliar river users to wad water which becomes unwadable at higher flows, thus presenting a safety risk to the public.

**19c** I am very opposed to allowing fluctuating flows to negatively impact the fishing of this magnificent river. I do support the daily single hump  
**19d** restriction, but encourage the Bureau to require the timing of the fluctuating flows to avoid unnecessary impact to fishing or other river use.

Thank you

Randall M. Connett, PE  
VECO USA, Inc  
9000 E Nichols, Suite 250  
Centennial, CO 80112  
(303) 268-3499  
(800) 292-1012  
(303) 549-3227 (cell)

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## **19. RANDALL M. CONNETT**

### **19a and 19d**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative.

### **19b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the

dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.

### **19c**

The world class trout fishery was established 40 years ago within the context and limitations of dam operations. Long-term negative effects to the trout fishery are not expected under the Action Alternative.

**From:** "Robert W. Day" <abqbob@ix.netcom.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 12:07 AM  
**Subject:** Green River Flow changes

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
Bureau of Reclamation, Provo Area Office

Sir:

- I have fished the Green River below Flaming Gorge for over 10 years and have considered it as one of the greatest trout rivers in the world. As in all tail water fisheries the change of water flow materially deteriorates the the quality of the fishing as well as providing a serious item of safety to the fishermen. It would seem that if these flow changes were to be made during the time that fishermen are not on the river it would add to the attraction of fishing the area. It is discouraging to travel a good distance and then find that the fishing is artificially manipulated and so diminished.
- The local economy, I am sure, would benefit from this change as well as Utah and Wyoming. I understand also that fishing and recreation have a priority in the operation of the dam and this priority is not always considered. I don't know what considerations are met by having the flow at mid-day but if there are no overriding reasons for mid-day then it would seem the fishing and recreation priorities could be used in having the flow changes at non fishing and recreation times.

Thank you for your attention.

Robert W. Day  
2924 Cagua NE  
Albuquerque, NM 87110

Robert W. Day  
abqbob@ix.netcom.com  
EarthLink Revolves Around You.

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## **20. ROBERT W. DAY**

### **20a**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **20b and 20d**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 below.

### **20c**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

**From:** "James DeSpain" <despainjames@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 5:30 PM  
**Subject:** Draft Environmental Statement

Dear Mr. Crookston,

I am a native Utahn, living in Pennsylvania. I make three fishing trips every year to the Flaming Gorge recreation area, specifically to fish the Green River. There is a group of 5 that go, and generally have a great time. It can be disappointing though when river flows change dramatically, and we experience periods of bad fishing. It makes us re-think the money we spend, and how we could have experiences in other parts of the country that are not interrupted by water changes. We love the area, and want to continue our tradition. We support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially

**21a** fishing. I'm sure you've also heard many times the risky situations sudden changes present to waders and other fisherman. I hope you can take these

**21b** comments, and use them constructively as the draft environmental statement is being created, and know that these views are possessed by almost all fishermen I encounter on the green. We love the river, and obviously want our experience enriched, but at the same time understand the need of electrical production. We just feel like it could be done in a more controlled and predictable environment.

Thank you for your time,

James DeSpain  
Telford, PA

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## **21. JAMES DESPAIN**

### **21a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

### **21b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased

dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.

**From:** "Franc Doyle" <francd1999@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Tue, Nov 16, 2004 4:15 PM  
**Subject:** Flaming Gorge Dam

To Whom It May Concern:

- 22a** I would like to express my displeasure with the fluctuations in the river levels that have been occurring on the Green River during the summer months. I understand that demand for electricity goes up in the summer to provide air conditioning to the millions of people that have made a choice to live in a desert environment and can't handle the heat, but I have my interests as well. During the summer months, fishing and floating on rivers is my main pastime. I am a teacher and have plenty of time to pursue my interests.
- The awesome fishing on the Green for years past prompted me to buy a fishing boat to use on the rivers. I fished over 30 days on the Green for 3 years in a row, but I noticed a sharp decline this past year with the flow fluctuations, so this year I only was up there for about 12 days. The fishing was lousy when normally it is spectacular. I believe that the fluctuations not only affect fish behavior but the timing of the bug hatches as well. Due to this, I fished more in Colorado this year, but was unable to use my boat as much because most of our rivers are too small to float.
- 22b**
- 22c** I urge you to consider providing electricity by raising the flows to a level that would allow the flow to be more constant and deliver the power you need for electric demand. This would create a win-win situation, you would generate electricity, fishing would be more fun, and people wading the river would be in less danger of getting stuck on the opposite bank.

Your engineers can certainly create a model that would average the flows to equal the generating capacity of raising the flows with such a steep peak and drop every day.

Frank Doyle  
Denver, CO

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## **22. FRANK DOYLE**

### **22a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **22b**

The world class trout fishery was established 40 years ago within the context and limitations of dam operations. Long-term negative effects to the trout fishery are not expected under the Action Alternative.

### **22c**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day.



**From:** "Nancy Bostick-Ebbert" <nancyb@sbt.net.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 9:36 AM  
**Subject:** Action Alternative

To Whom it May Concern:

**23a** My name is Paul Ebbert. I am a resident of Vernal and a member of the UDWR Regional Advisory Council. I am writing to express my support for the Action Alternative which allows for increased flows down the Green River during the 10th wet year. The best information available indicates that this is important for the recovery of the endangered fish in the Colorado River system as well as improving habitat along the river corridor.

Thank you for this opportunity to comment.

Sincerely Yours,

Paul J. Ebbert  
1 North 2500 West  
Vernal, UT 84078

(435) 722-5122 (work)

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## **23. PAUL J. EBBERT**

**23a**

Comment noted.

**From:** "Bryan Eldredge" <bryeld@zcloud.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 7:45 PM  
**Subject:** Green River Water Flows

Dear Mr. Crookston,

24a It is my understanding that you are asking for comments in regards to the operation of the Green River Dam at Flaming Gorge. I am an avid flyfisherman who very much enjoys the recreational opportunities available below the dam, of fly fishing the River. This Past September I was part of a group of 5 men who took valuable time off from our jobs to spend a few days fishing in the Little Hole area. We were very disappointed to find the fishing so slow. None of us are very well off and it was quite some sacrifice financially for all of us, not only to take the time off work but the cost of travel and fishing tackle as well. I think we all left the river feeling that the sacrifice of time and money was not worth it. I feel that the high flows of the river in the middle of the afternoon were a big reason for the fishing to be so slow. Further I would like you to know that I support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing.

Thank you for listening, Bryan Eldredge  
This email scanned for Viruses and Spam by ZCloud.net  
For more information on our \$99 per year dial-up internet with filtered email please visit us at:  
<http://www.zcloud.net>

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## **24. BRYAN ELDREDGE**

### **24a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** <erkpsyd@cox.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 2:18 PM  
**Subject:** Green River Flows at Flaming Gorge

Dear Mr. Crookston,

- 25a** I would like to express my thoughts regarding the fluctuating flows at Flaming Gorge I experienced while fishing the Green River this past season. Because of these flow changes, I chose not to fish the Green after flying into Salt Lake because it ruins the dry fly fishing at mid day. Instead, I spent my vacation dollars that day in the Heber area. Regarding safety, nothing gets one's attention like having the river rise while one is wading near the opposite bank, leaving one to contemplate fording the river at waist to chest
- 25b**
- 25c** deep levels! We support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing.

Respectfully,

Jeff Erkenbeck, Psy.D.  
San Diego, CA

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## **25. JEFF ERKENBECK**

### **25a and 25c**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **25b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river

warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

**From:** "Kurt Finlayson" <KFinlayson@iconfitness.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 8:29 AM  
**Subject:** flow changes

- 26a** I am an angler and I enjoy fishing the green River. I am strongly against mid day flow changes. It is my understanding these can be done once a day, possibly at night. Flow changes are bad for fishing and are unsafe for wading anglers.
- 26b**

Thanks

Kurt Finlayson

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## **26. KURT FINLAYSON**

### **26a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **26b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below.



**From:** "Fitz Fitzgerald" <troutbum@colorado.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 5:22 PM  
**Subject:** green river flows

27a If possible please keep the green river flows constant during the day light fishing hours.

Thank you,

Richard Fitzgerald

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## **27. RICHARD FITZGERALD**

### **27a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** "Robert Freestone" <rafreestone@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 9:29 PM  
**Subject:** Flaming Gorge Environmental Impact Statement

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317

Dear Mister Cookston

I was born and raised in Utah. I now live in the Chicago area. The highlight of my vacation each year to Utah is going fishing in the Green River below Flaming Gorge Dam.

This past June was a disappointing fishing trip. The low flows in the morning followed by the high flows in the afternoon moved the fish from where they had been in past years. I prefer to fish from the bank of the river. I have never seen so few visible fish as there was this year during the low flows. The fish would appear with the higher waters but were not interested in feeding.

Some fisherman who waded across the river at the Little Hole boat ramp would have had a real surprise when they tried to get back across the river.

**28a** I realize that the purpose of the dam is more than to provide a place to fish. I support the single daily peak hump restriction. Any daily peak hump should be in hours where the recreation activities of the river are affected the least.

Thank you,  
Robert Freestone  
5S400 Stewart  
Naperville, IL 60563

Robert Freestone  
rafreestone@earthlink.net  
Why Wait? Move to EarthLink.

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## **28. ROBERT FREESTONE**

### **28a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** "bruce.gibbs@juno.com" <bruce.gibbs@juno.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 10:00 AM  
**Subject:** Green River flows

- 29a** I received an email saying that you are considering jacking with the flows on the Green River at Flaming Gorge. Please don't! This bouncing the flows makes it much less attractive to fish and raft. My kids and I  
**29b** would like to use this river and enjoy this canyon and I don't want to worry about flows and related safety questions.

Thanks!  
Bruce Gibbs  
8425 Wright St  
Arvada CO 80005  
(303) 467-2656

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## **29. BRUCE GIBBS**

### **29a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **29b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

**From:** <KMGSage@aol.com>  
**To:** <fgels@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 8:36 AM  
**Subject:** Green River flows

Dear Mr. Crookston,

I am a resident of the Denver metropolitan area. I have been fishing the tailwater below Flaming Gorge for the last twelve years. I make an average of three trips per year to Dutch John to pursue my passion for fishing, and I also visit locations in New Mexico, Colorado and Montana with the same frequency. I seldom travel alone. My two sons and my wife also fish, and we enjoy the beauty of the Green and the hospitality of the local tourism industry.

On a September trip to the Green this year, my wife and I fished the A section for three days. On the second day, we particularly noticed the flow fluctuation during the day. As we stopped for a late lunch, we noticed the rise in stream flow. Our boat, which had been partially beached, became buoyant. We adjusted the anchor line and continued to picnic and fish without incident. However, we noticed that just downstream a large raft had become riverborne without an oarsman. We watched helplessly as the party below us called out to fishermen below them to save their raft. Miraculously, a rescue was mounted and the raft was saved at the last moment. The runaway raft was commandeered and the grateful boaters were reunited with their craft without mishap.

- 30a** Did such an incident need to occur? No. Extreme flow fluctuations can occur naturally on freestone rivers, but do not need to happen on "managed" rivers. At least, not during the afternoon hours on a popular flyfishing and rafting tailwater that is supposed to be "managed" for recreation. As an experienced fisherman, I can state unequivocally that extreme fluctuations in flow also have a deleterious effect on fishing. The fish simply stop feeding in reaction to the drastic change in their environment. In freestone rivers, where
- 30b** fluctuations occur normally, it often will take days for fish to resume their "normal" feeding behavior. Drastic daily flow fluctuations simply can not be good for the fish population. Certainly, flow fluctuations during the daylight hours are terrible for the fisherman as well.

- 30c** I am writing to ask you to reconsider this policy. The rivers in the West (and the resident fish populations) are in serious trouble from a variety of influences: de-watering due to drought and agricultural diversion; pollution from mining, agriculture, and industrial runoff; whirling disease; non-native species introduction; and erosion from wildfires. It is unconscionable to continue a policy that creates further stress on this important resource.

Thank you for your consideration of this request. It is my fondest hope that I can continue to visit the Green River with my friends and family for many years to come, and that the experience will remain as enjoyable as it has always been.

Sincerely,

Kerry M. Gublits  
 1 Meadow Rose Lane  
 Littleton, CO 80127  
 303 972-8153

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**30. KERRY M. GUBITS****30a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

**30b and 30c**

The world class trout fishery was established 40 years ago within the context and limitations of dam operations. Long-term negative effects to the trout fishery are not expected under the Action Alternative. Please see response to individual letter 38 below.



**From:** "uela" <uela@ubtanef.com>  
**To:** <fgeis@uc.usbr.gov.>  
**Date:** Fri, Nov 12, 2004 11:50 AM  
**Subject:** Flaming Gorge Dam Proposed Change of Water Flow

Bureau of Reclamation  
Provo Area Office  
302 E. 1860 S.  
Provo, Utah 84606-7317

Attention: Peter Crookston  
Flaming Gorge EIS Manager  
PRO-774

Dear Sir:

**31a** I believe one of the prime purposes for building the Flaming Gorge Dam was to ameliorate the Ravages of flooding, not to enhance them. Speaking as one who has had to deal with the high water surges along the Green River, the idea of increasing the flow from "the dam" to correspond with the flow of the Yampa borders on insanity. The liabilities certainly

**31b** outweigh the benefits of such an action. Given the likelihood of above normal precipitation, flooding will be severe enough, without making it worse.

Signed,  
J. Dean Hansen  
2631 E 2500 S  
Vernal, Utah 84078

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## **31. J. DEAN HANSEN**

### **31a**

The presence of the dam for over 40 years has indeed served to moderate flooding. However, this was never intended to mean that the flood plain would remain permanently dry. It means only that there is increased ability to moderate potentially catastrophic flows. Since the dam was built, there have been a number of wet years where high flows have occurred, such as 1983. Whether or not the proposed action is implemented, high flows would be expected in the future; and none of the high flow targets in the Action Alternative exceed the very high natural flows that have occurred historically.

### **31b**

Reclamation is not responsible for damages to improvements or property in the flood plain. Any improvements have always been made by property owners at their own risk. Flood plain inundation has always occurred along the Green River, though less frequently since Flaming Gorge Dam was built. Nevertheless, though the frequency has declined since the dam has been in place, there has always remained the potential for significant flood plain inundation in wet years, and that potential will continue under either alternative. As part of its operation of Flaming Gorge Dam, Reclamation has in the past and will continue to provide public notification when flows are expected to increase, to enable property owners along the river to remove or secure equipment and livestock.

**From:** Virginia Harrington <vernalwriter@yahoo.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Tue, Nov 9, 2004 3:17 PM  
**Subject:** EIS for Flaming Gorge

I am a Ph.D. medical anthropologist and former teacher with the University of Utah and Weber State University as well as the University of Maryland. I have a thorough understanding of the evolutionary relationship between the environment, disease pathogens and resident mammal species, including humans.

With this background, I am totally opposed to the proposed change in the operation of Flaming Gorge Dam to match the flow and temperature of water in the Green River and the Yampa River at their point of confluence. The flat bottomlands of the Green River would cause a massive increase in the breeding grounds for all species of mosquitoes if this flooding is allowed to take place.

32a

The mosquitoes would rapidly spread West Nile virus to people, horses and other animals. In addition, the spread of heart worm to family pets and working farm dogs would be dramatic.

Dr. Steven Romney of the Uintah Basin Mosquito Abatement District does an admirable job. However, he cannot be expected to protect our health with his limited funds if thousands of additional acres of mosquito breeding grounds are created.

32b

In addition, there are serious problems with trying to match the flow of the two rivers. It is apparent from statements made by local experts, including the Department of Fish and Wildlife, that there is the potential for damaging spawning bars used by at least one of the four species of endangered fish that this

32c

proposed change is supposed to protect. The fish are making a comeback, granted a slow one, without this change. Why take the chance on harming them while at the same time endangering the health of Uintah County residents and their animals?

32d

I have one last concern with the proposed change. The farmers and ranchers in this area already struggle with noxious weeds damaging their crops and interfering with grazing. (These noxious weeds also damage the grazing grounds for deer, elk, etc.) Increased flooding would spread the weed seeds across many acres of farm land. The land would be unusable in wet seasons and covered with weeds in dry seasons.

Please put the people of Uintah County first as you make your decision on this proposed change.

Thank you for your consideration,  
 Virginia L. Harrington, Ph.D.  
 PO Box 3  
 Vernal, UT, 84078

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## **32. VIRGINIA HARRINGTON**

### **32a**

The EIS acknowledges (section 4.13.3.) that the proposed action will increase mosquito habitat to the greatest extent in Reach 1, and to a lesser extent in Reach 2, which includes the town of Jensen as well as Uintah County. Based on our analysis, Reclamation believes that the increased risk of diseases such as West Nile virus, compared to other potential vectors for the disease, including irrigation and standing water on private property closer to population centers, is so small that it is insignificant. We do not anticipate a linkage between Reclamation's proposed action and a threat from West Nile virus or other mosquito-borne diseases.

### **32b**

The 2000 Flow and Temperature Recommendations are intended to aid in recovery of four endangered fish species by restoring a more natural flow regime to the Green River. The uncertainties associated with operating Flaming Gorge Dam under the Action Alternative, summarized in section 4.19, would be monitored and addressed through an adaptive management process if the Action Alternative is implemented. This adaptive management process would consist of an integrated method for addressing uncertainty in natural resource management. It is an ongoing, interactive process that reduces uncertainty and continually incorporates new information in the decisionmaking process.

Damage to spawning bars due to the proposed action is not anticipated but would likely be addressed through adaptive management projects designed to evaluate channel maintenance and endangered fish spawning activities.

### **32c**

There are few data suggesting that the four endangered species are making a comeback; in fact, most data suggest that populations of four species are either stable at dangerously low levels or declining in some cases. At best, all four species currently exist at diminished population levels which preclude removing them from the ESA or improving their ESA status. Implementing the 2000 Flow and Temperature Recommendations is one measure which is expected to substantially aid in their recovery. See the Recovery Program website <<http://www.r6.fws.gov/crrip/rea.htm>> or call the Recovery Program at 303-969-7322, ext. 227 for more information.

### **32d**

Reclamation is not responsible for damages to improvements or property in the flood plain. Any improvements have always been made by property owners at their own risk. Since the arrival of invasive species in the Uintah Basin (tamarisk was probably present by the 1930s), flooding has facilitated their spread. Flood plain inundation has always occurred along the Green River, though less frequently since Flaming Gorge Dam was built. Nevertheless, though the frequency has declined since the dam has been in place, there has always remained the potential for significant flood plain inundation in wet years and for the spread of invasive species, and that potential will continue under either alternative.

**From:** "Corey Harris" <corey@big3consulting.com>  
**To:** <fgels@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 11:25 AM  
**Subject:** Green River Flows

Peter,

- 33a Please accept my opinion about the proposed fluctuation of flows on the Green River at Flaming Gorge Dam during peak fishing hours. As an avid flyfisherman, I make numerous trips to the Green River each year to float and fish the Green River and camp in local campgrounds.

- 33b Last summer the flow fluctuations during mid-day really impacted not only the fishing but the overall experience on the Green River. We had to be conscious of where we could anchor our boat while eating lunch or wade fishing and where we could wade safely. The flow changes also dramatically impact the quality of fishing.

As fisherman and outdoor enthusiasts, we spend a lot of money on fishing licenses, fishing equipment, boats and registration, fuel, lodging, campground reservations and supporting local restaurants and gas stations. The flow fluctuations on the Green continuing (especially during peak fishing hours) will seriously affect my decision to own a drift boat and make fishing trips from the Salt Lake valley to the Green River. If the quality of fishing is not the same and we have to deal with the flow fluctuations, I will drive the other direction and spend my time and dollars in Idaho on the Henry's Fork.

Please accept our comments and help us find "middle ground" between power generation and fishing opportunities.

Regards,

Corey Harris, Managing Partner  
Big 3 Consulting  
724 West 500 South, Suite 700B  
Bountiful, Utah 84087  
801-677-6006 x2  
801-677-6007 Fax  
801-856-6795 cell  
<mailto:Corey@big3consulting.com> Corey@big3consulting.com  
<http://www.big3consulting.com> www.big3consulting.com

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### **33. COREY HARRIS**

#### **33a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

#### **33b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns. Please see response to individual letter 38 below

**From:** "Craig W. Hauser" <chauser@rockymountainfoodsinc.com>  
**To:** "'fgeis@uc.usbr.gov'" <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 9:24 AM  
**Subject:** Green River/Flaming gorge dam

- 34a I understand you have the issue of the change flow out of the Flaming Gorge Dam before you at this time. It is my opinion that the flow should either be changed during none fishing hours, or regulated though out the day so that we do not experience the big changes that occurred this year. It had a very negative impact on many of my trips to the Green River this year. The changing flow has a negative impact on the fishing often putting the fish down for hour during the peak of the day. It also is dangerous for those of
- 34b who are wading to have the sudden increased flow while we are in the river. I make many trips a year to the Green River and spend several \$ on lodging, food , gas, tackle etc. Please do all in your power to control the flow and
- 34c keep the Green River a great fishing experience.

Craig W. Hauser

---

## **34. CRAIG W. HAUSER**

### **34a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **34b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the

dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **34c**

The world class trout fishery was established 40 years ago within the context and limitations of dam operations. Long-term negative effects to the trout fishery are not expected under the Action Alternative. Please see response to individual letter 38 below.



**From:** "Rick Hayes" <eps@sopris.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 10:18 AM  
**Subject:** Flaming Gorges Releases of water

Dear Sirs,

35a As a concerned fisherman I would like to comment on the releases of water from Flaming Gorge Dam. I feel strongly that the releases could be timed better so that the flows do not effect the safety of fisherman during daylight hours. As well the fish do not respond well to fluctuations and it sets them off. Thus, making the sport even more difficult. I love the Green River and spend many dollars there each year along with my family and friends. Please try to set the fluctuations for nighttime hours. Thank You  
35b for your help in this matter.

Sincerely,

Rick Hayes

257 Cheyenne Ave.

Carbondale, CO 81623

970-704-1154

**CC:** <dbreer@union-tel.com>

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## **35. RICK HAYES**

### **35a**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge

among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **35b**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

**From:** <Jeb.Himsl@RxAmerica.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 3:52 PM  
**Subject:** DEIS on the Operation of Flaming Gorge Dam

Mr. Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office

Dear Mr. Crookston:

**36a** The following is a comment regarding the operation of the Flaming Gorge Dam. Specifically, I oppose daily release fluctuations during daylight hours. The reasons for my opposition are due to impacts on safety and environment.

**36b** I have been an avid floater of the Green River since becoming a resident of Utah in 1986. Since that time, I have witnessed many dangerous activities that are only complicated with increased flows. These range from waders being stranded and attempting a crossing that had been previously safe, to floaters that are simply unprepared to deal with the dangers of increased hydraulics. Changing flow conditions during peak daily use puts users in unanticipated situations. While there is no substitute for common sense, changing flows and limited access points through the Green River corridor actually increases the risks that users must confront. Inexperienced users, which are the overwhelming majority on the Green, often make poor decisions when confronted with the changing conditions.

Keeping flow constant during peak daily use periods minimizes risk and improves safety.

**36c** As for the environment, changing flows during daylight hours also has an adverse affect on the fishing resources of the Green. It changes the distribution patterns of anglers, causing congestion and overuse during certain periods of the day. It also affects daytime food availability to the fish. Although I do not know the biological implications on a river that is so dependent on terrestrial food sources, I do know the impact on the recreational use of the fishery.

Please be sure to address these concerns in the DEIS and oppose ongoing daily flow fluctuations.

Thank you,

Jeffrey Himsl  
2441 Cliff Swallow Dr.  
Sandy, UT 84093

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## **36. JEFFREY HIMSL**

### **36a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **36b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the

fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **36c**

The world class trout fishery was established 40 years ago within the context and limitations of dam operations. Long-term negative effects to the trout fishery are not expected under the Action Alternative. Please see response to individual letter 38 below.

**From:** "Hunter, Jack" <jack.hunter@hp.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 9:16 PM  
**Subject:** Green River Flows below Flaming Gorge Dam

To: Mr Peter Crookston

RE: Flaming Gorge Environmental Impact Statement Manager

Dear Mr. Crookston,

37a As an avid sportsman and a frequent visitor to the Flaming Gorge area I  
37b am concerned about the recent Draft Environmental Statement being  
considered but the Bureau of Reclamation. Specifically, I am concerned  
about the apparent disregard for maintaining consistent flows from the  
flaming gorge dam in support of fishing conditions below the dam.  
Clearly this draft statement favors power production over the needs of  
the fish and the fisherman. Last year I experienced the major change in  
flows from 800 cfs to 1500 cfs during mid-day fishing. It completely  
shuts down the fishing below the dam and negatively impacts both the  
fish and the fisherman. If this plan is implemented again this year it  
is fair to say that I will not visit the area because I will not be able  
count of the consistent fishing and river flows of the past. Please  
consider this input and that of other fisherman in making your decision  
on this matter...

Best Regards,

Jack Hunter

---

## **37. JACK HUNTER**

### **37a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 below.

### **37b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power

generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** "Dale Huskey" <kayceejake@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 7:23 AM  
**Subject:** Fw: Green River Alert- Please Read This!

If this is accurate, and you can increase the flows during "non recreational" hours, why not? I have spent a lot of money in the local economy for fishing trips. I take two annual trips with my customers. I may look elsewhere if the fishing was not so good and predictable.

Please take this into consideration when making your decision.

Thank you,

Dale Huskey  
 Signode Western Operations  
 ----- Original Message -----

From: Allen Brisk <mailto:Allen.Brisk@paccoast.com>  
 To: 'kayceejake@msn.com' <mailto:'kayceejake@msn.com'>  
 Sent: Friday, November 12, 2004 4:51 PM  
 Subject: FW: Green River Alert- Please Read This!

-----Original Message-----

From: fishgreenriver [mailto:dbreer@union-tel.com]  
 Sent: Friday, November 12, 2004 2:01 PM  
 To: Allen Brisk  
 Subject: Green River Alert- Please Read This!

#### GREEN RIVER ACTION ALERT!

Dear Green River fishers. We need your help! November 12,  
 2004

The Bureau of Reclamation is undergoing a Draft Environmental Statement on the Operation of Flaming Gorge Dam and asking for comments.

One of the things that frustrates many of us who fish below dams is the erratic way flows can suddenly jump up and down while we are fishing. This can often disrupt water quality and upset the fish for set periods of time.

- 38a** The end result is a spoiling of our fishing day. The Draft EIS allows for fluctuating flows for power generation up once a day and then down. In 2004 this was experienced by many of us on the Green as they went from 800 cfs to 1500 cfs every day (at 1:00 pm, right in the middle of the day) after our high flows in early June to the end of September. We hated the reaction from the trout, the fishing could and often did go flat for periods of time. Then they brought the flows down while we were trying to start fishing again and the process started again. The ups and downs and the disruption they caused to our fishing experiences were uncalled for. They have the ability to do the power generation flows in non-fishing hours or maintain a slightly higher steady f
- 38b** low that generates the same amount of electricity.

- 38c** Recreation and fish have a priority over power generation under the

authorized purposes of the Flaming Gorge dam. They never advertise this. They have hoodwinked us into never protesting their exploitation of your rights. Make your views known.

38d If you can share our frustration with this, e-mail or fax these guys and  
38e tell them. Relate to them your experiences with changes in flows while you  
38f were fishing. What happened and whether or not you are likely visit rivers  
where you know this is occurring. You might mention how your fishing dollars  
impact local businesses and Utahs overall economy. The technical sentence  
you might include is- We support the single daily peak hump restriction, but  
its timing should be in a manner that it has no impacts on river recreation  
activities, especially fishing. You can also address the issues of safety, a  
waders safety is effected negatively when river flows change abruptly.

We need note writers and fast. These don't have to be extended notes unless  
you feel compelled to do so. Just give your feelings on the subject, if you  
have experiences that you can relate to them, even better. Anything will  
help. This is your chance to be heard. Time is unfortunately an issue. We  
are nearing the comment periods ending, it closes next Monday, November 15,  
2004. That's why we suggest e-mail or faxes.

Help us if you can, pass this note onto others that you know fish or that  
appreciates the world class trout fishery at Flaming Gorge that might add  
their voices as well. We know we are late in requesting your help, the  
document is large and we have had to spend a lot of time determining issues  
and their impacts on fishing. We would appreciate all the assistance we can  
get. Denny. dbreer@union-tel.com<mailto:dbreer@union-tel.com>

Address your comments to-  
Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317  
801-379-1152  
801-379-1159 FAX  
E-MAIL- fgeis@uc.usbr.gov<mailto:fgeis@uc.usbr.gov>

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## **38. DALE HUSKEY**

### **38a**

Daily fluctuating releases are permitted under both the Action and No Action Alternatives.

### **38b**

Fluctuating releases during the day have been the normal operations of the powerplant since it began power generation 40 years ago and would continue under either alternative. The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day.

### **38c**

Reclamation seeks to meet all of the requirements placed upon the reservoir and dam and seeks to balance the benefits among all authorized purposes of the facility. The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. Please see section 1.4 of the EIS for authorized purposes of the dam.

### **38d**

The single daily peak hump restriction is outside the scope of the EIS; however, it is noted that the changes in flows, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Hydropower is the best source available for meeting peak demands. Meeting peak demands is currently tempered; however,

by the need to meet environmental concerns and safety of anglers.

### **38e**

Reclamation is well aware of the recreation value created by the construction of Flaming Gorge Dam, including the trout fishery which did not previously exist. The EIS acknowledges the possibility of both positive and negative effects under differing conditions if the Action Alternative is implemented. It should be noted that the nature and timing of fluctuating releases, and other daily operational details, would remain substantially the same under either the Action or No Action Alternative. The trout fishery was established 40 years ago within the context and limitations of dam operations; and over time, certain operational changes have benefited the trout fishery.

### **38f**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

**From:** <BISON1BOB@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 10:07 PM  
**Subject:** Green River Flow Management

Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO 774  
BuRec, Provo, UT

- 39a** For safety, economic and recreation purposes, please do not allow the erratic flow changes from Flaming Gorge Dam. Please find a flow pattern which does not disrupt water quality and still permits adequate power generation. Please uphold the priority that recreation and fish have over power generation. Past
- 39b** behavior suggests that your agency has little regard ro these priorities.

Bob Johnston  
p.o. box 50872  
Henderson, NV 89016

bison1bob@aol.com

**CC:** <BISON1BOB@aol.com>, <dbreer@union-tel.com>

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## **39. BOB JOHNSTON**

### **39a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

### **39b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives.

We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** <Donx.Jane@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Thu, Nov 4, 2004 9:09 PM  
**Subject:** EIS report on flooding the Green River bottoms

Mr. Peter Crookston:

- 40a I would like to express my strong opposition to the flooding of green river bottoms.  
I live within one mile of Green River, and when the bottoms are flooded, the bugs come
- 40b out in the millions. With West Nile problem, it could be deadly.  
To suggest a fish if more important than my family is very wrong. We know the West Nile will kill, and we don't know what the endangered will do, or if they have any benefit  
Please give this more and serious thought doing something that would kill people

Thank You....Don E. Jorgensen

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## **40. DON E. JORGENSEN**

### **40a**

Flood plain inundation has occurred along the Green River in the past, though less frequently since Flaming Gorge Dam was built. There has always remained the potential for significant flood plain inundation in wet years, and that potential will continue under either alternative. The presence of the dam for over 40 years has indeed served to moderate flooding. However, this was never intended to mean that the flood plain would remain permanently dry. It means only that there is increased ability to moderate potentially catastrophic flows. Since the dam was built, there have been a number of wet years where high flows have occurred, such as 1983. Whether or not the proposed action is implemented, high flows would be expected in the future, and none of the high flow targets in the Action Alternative exceed the very high natural flows that have occurred historically.

As part of its operation of Flaming Gorge Dam, Reclamation has in the past and will under either alternative continue to provide public notification when flows are expected to increase, to enable property owners along the river to remove or secure equipment and livestock.

### **40b**

The EIS acknowledges (section 4.13.3.) that the proposed action will increase mosquito habitat to the greatest extent in Reach 1, and to a lesser extent in Reach 2, which includes the town of Jensen as well as Uintah County. Based on our analysis, Reclamation believes that the increased risk of diseases such as West Nile virus, compared to other potential vectors for the disease, including irrigation and standing water on private property closer to population centers, is so small that it is insignificant. We do not anticipate a linkage between Reclamation's proposed action and an increased threat from West Nile virus or other mosquito-borne diseases.

Reclamation notes that the issue of mosquito control along the Green River has been discussed annually at the Flaming Gorge Working Group meetings, and we expect such dialogue to continue in the future, whether or not the proposed action is implemented. As noted in section 4.21 of the EIS, Reclamation is committed to continuing dialogue with county officials to explore the potential to assist with mosquito control.

**From:** <DonxJane@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 5, 2004 2:15 PM  
**Subject:** EIS report on flooding the Green River bottoms

Mr. Peter Crookston:

- 41a** I would like to express my strong opposition to the flooding of Green River bottoms.
- 41b** I live within one mile of Green River, and when the bottoms are flooded, the bugs come out in the millions. With West Nile Virus on the move, it could be a great problem for those who live near by. I have experienced some health problems with severe bronchitis and other respiratory infections. I would strongly suggest that you take another look at this issue.

Thank You, Dora J. Jorgensen

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## **41. DORA J. JORGENSEN**

### **41a and 41b**

Please see response to individual letter 40 above.

**From:** Wade Kafkaloff <wade.kafkaloff@jpl.nasa.gov>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 8:55 AM

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317

Mr. Crookston, I have visited the Green River several times over the last few years. This year I have been fishing in Northern California in part because of the variable flows being experienced on the Green this year. I urge you to consider increasing/decreasing the flows during non-fishing hours on the Green. Although my fly fishing buddy and I are only two people, I'm sure there are many others with the same concerns. You're competing directly with the city of Redding California. It's an easy flight from Southern California (I fly a small plane to my fly fishing destinations). The Redding Airport, The Fly Shop, its guides, and the State of California will be happy to continue receiving my fly fishing dollars if you continue to adversely affect the fishing on the Green by varying flows during the day.

42a

Thank you for listening to my concerns.  
Sincerely,  
Wade Kafkaloff  
South Pasadena, Ca.  
818-354-4769



---

## **42. WADE KAFKALOFF**

### **42a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Bruce Kautz" <blkautz@adelphia.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 7:18 AM  
**Subject:** Green River flows

Dear Mr. Peter Cookson,

I, my family and my friends frequently come to north eastern Utah to fish the Green River below the Flaming Gorge Reservoir. The only reason we drive 8 hours is to fish. We always hire a guided drift boat for at least 2 days of our trip. We spent 4 days there this past May and had an enjoyable time for the most part. We did notice that because of the way the outlet flow from the dam had been ramped up and then turned down, the fishing was off a couple days. That made it very difficult for our guide and made the trip less enjoyable as in the past. Again, our trips there are for 1 reason - to fish. Losing us and others because of poor fishing due to sporadic flow changes will potentially send us to other rivers in Colorado, New Mexico, Wyoming and Idaho in our pursuit of great fishing. That will affect the financial economy of the Flaming Gorge / Dutch John, Utah area.

I would like to encourage you and your division to do whatever you can to keep flow adjustments in a realm that continues to give the electrical power needed, yet maintain a great fishery every day of the year.

Sincerely,

Bruce Kautz

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### **43. BRUCE KAUTZ**

#### **43a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

#### **43b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

**MEMO**

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**TO:** Mr. Peter Crookston, Flaming Gorge Environmental Impact Manager  
PRO-774, Bureau of Reclamation, Provo Area Office,  
302 East 1860 South  
Provo, Utah 84606-7317

**FROM:** Mr. Ted E. Kulongoski, E.I.T.  
Graduate Student  
Environmental Resources Engineering Department  
Humboldt State University  
1 Harpst Street  
Arcata, CA 95521

**DATE:** Wednesday, October 06, 2004

**SUBJECT:** Comment on Operation of Flaming Gorge Dam Draft Environmental Impact Statement (DEIS) ending November 15, 2004.

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**1.0 SUMMARY**

To protect and assist in the recovery of four endangered fish species currently listed as threatened by the Endangered Species Act, the Bureau of Reclamation is considering whether to implement a Proposed Action under which the Flaming Gorge Dam would be operated to meet specified peak flows, water temperatures, flow durations, and base flow levels on the Green River. Alternatives will require greater variation in annual river flow as a means to recreate and reestablish a more historic riverine ecosystem conducive to the endangered fish populations.

Although the Bureau of Reclamation has made substantial progress in identifying and addressing the many impacts associated with the two alternatives, the DEIS in its current form was found incomplete in three technical areas:

1. Groundwater Impacts

Both of the alternatives considered in the DEIS will increase the flows of the Green River, resulting in increased infiltration and a potential impact on the groundwater system. Further modeling of the groundwater system, in regard to the Action and No Action Alternatives, will be needed to better understand how the increased flows will likely impact the basin groundwater.

## 2. Sensitivity Analysis for Models

The lack of parameter sensitivity information for any of the models used in the DEIS casts a shadow of uncertainty on the results discussed. Much of the work completed for the Flaming Gorge DEIS involved sophisticated modeling of the Flaming Gorge Dam and downstream reaches. Evaluation of the model's robustness by means of a sensitivity analysis of key parameters was not included in the DEIS. Completing and providing a documented sensitivity analysis is necessary in validating the model's results and supporting the conclusions derived from those results.

## 3. Impacts of Future Diversions and Increased Consumption

The need to examine in greater detail scenarios of reduced flow is justified by the Final Biological Opinion on the Operation of Flaming Gorge Dam where the U.S. Fish and Wildlife Service (1992) determined that flow depletions from water resource projects, both up and downstream, would likely jeopardize the continued existence of endangered fish. Further use of the Flaming Gorge Dam model will be needed to adequately explore how future water diversions, increased consumption, and depletions from the Green River will alter the flow regimes considered by the two alternatives considered in the DEIS.

I request the Bureau of Reclamation to consider these recommendations and to assimilate the needed information for the Final Environmental Impact Statement.

### **BACKGROUND**

The Bureau of Reclamation is considering whether to implement a Proposed Action under which the Flaming Gorge Dam would be operated to achieve the flow and temperature regimes recommended in the September 2000 report *Flow and Temperature Recommendations for Endangered Fishes in the Green River Downstream of Flaming Gorge Dam*, published by the Upper Colorado River Endangered Fish Recovery Program. The 2000 Flow and Temperature Recommendations specifically describe the recommended peak flows, durations, water temperatures, and base flow criteria on the

Green River, to protect and assist in the recovery of four endangered fish species currently listed as threatened by the Endangered Species Act. The four endangered fish species are the humpback chub (*Gila cypha*), the Colorado pikeminnow (*Ptychocheilus lucius*), the razorback sucker (*Xyrauchen texanus*), and the bonytail (*Gila elegans*).

#### **DEIS TECHNICAL POINTS NEEDING FURTHER ATTENTION**

Although the Bureau of Reclamation has made substantial progress in identifying and addressing the many impacts associated with the Proposed Action, the DEIS in its current form was found incomplete in three technical areas.

##### ***Groundwater Impacts***

44a The Proposed Action Alternative and the No Action Alternative outlined in the DEIS will increase river flows for the 410 river miles of the Green River below Flaming Gorge Dam and inundate the historic flood plain. The increase in available surface water will influence the groundwater of the Green River Basin. Although analysis and discussion were presented in Chapter 4, Section 4.3.2, that “addresses impacts to water resources within the affected environment downstream from Flaming Gorge Dam,” the DEIS failed to identify groundwater as a hydrological impact. A search of the DEIS document reveals that no consideration was made to groundwater impacts. The only mention of groundwater is in Chapter 3, Section 3.3.2, regarding water salinity where drawdown of the reservoir may result in bank storage (groundwater) flowing into the reservoir. Neglecting to introduce the impact of the two Alternatives on the groundwater system of the Green River Basin was a gross oversight and should be given due consideration.

Hydrology for a riverine system where there is an increase in flood plain surface water will commonly result in an increase in groundwater infiltration. The quantity of water infiltrating depends on the soil texture, soil structure, vegetation, and soil moisture status. Because soil characteristics vary over the 410 river miles of the lower Green River, the amount of groundwater infiltration occurring from the proposed flow regimes is unknown. Further modeling of the groundwater system, in regard to the Action and No Action Alternatives, will be needed to better understand how the increased flows will likely impact the basin groundwater. This is an important consideration given the geographic location and environment of the Green River Basin.

The Green River Basin is classified as a high desert environment and has an average annual rainfall of less than ten inches (World Climate, 2004). Given the limited annual precipitation, water rights and the development of water resources is critical to the economic and recreational vitality of the area and is subject to numerous federal, state, and county laws and regulations. Because the region can be described as water poor, an increase in available groundwater will qualify as a significant impact to the Green River Basin. Higher groundwater levels would significantly impact agriculture, ecology, and land use around the Green River. If larger quantities of groundwater became available due to the increased flows on the Green River (as a result of the Action and No Action Alternatives) and that water was allocated for beneficial use through water rights, it would be very difficult to substantially modify the Flaming Gorge Dam discharge program in the future. A groundwater study of the Lower Green River Basin is therefore necessary to evaluate and consider the possible impacts of the Action and No Action Alternatives.

#### ***Sensitivity Analysis for Models***

An important tool to assist in developing any model is a sensitivity analysis. The sensitivity analysis illustrates the model's response to slight changes in model parameters. For a model to prove robust, it must produce similar results (output) when small changes to key parameter values are made. If the model's results vary significantly after slight variation of the key parameter values, then the model may require further calibration, or in some cases, the parameter values used will need to be documented and/or tested to assure model validity.

44b Completing and providing a documented sensitivity analysis is necessary not only to help in validating the model's results, but also to support the conclusions derived from those results. Much of the work completed for the Flaming Gorge DEIS involved sophisticated modeling of the Flaming Gorge Dam and downstream reaches. Documentation of the model building, calibration, and validation process was included in Appendix 2 – Hydrologic Modeling. Unfortunately, no results of a sensitivity analysis on the Flaming Gorge Dam model could be found in the Appendices or main DEIS. The same was true

44c for the hydroelectric power model developed to compare electricity generation capacities of the two alternatives (Appendix 5). The lack of parameter sensitivity information for any of the models used in the DEIS casts a shadow of uncertainty on the results discussed.

The inclusion of a sensitivity analysis will also allow the opportunity to document “What if” scenarios. A “What if” scenario will document the model’s results when realistic changes are made to the model’s parameters or input values. An example of a “What if” scenario for the Flaming Gorge DEIS is the economics of electricity generation using the power model. The economics of the No Action and Action Alternatives are based on net present value (NPV) calculations of the hourly value of Flaming Gorge electricity generation over the 25-year study period. The value of generation is computed by multiplying hourly electricity production by the hourly spot market price. All NPV calculations are based on an annual discount rate of 5.5 percent. The model results presented in the DEIS indicated no significant difference in electricity generated revenue 44d among the two alternatives, but that was for only the 5.5 percent discount rate. What if the model was run again but the discount rate was changed by  $\pm 0.5$  percent? Are the results, the difference between NPVs of each alternative, still insignificant? What if the discount rate were changed by  $\pm 1.0$  percent? What if the Average Spot Market Price was changed by  $\pm \$5/\text{MWh}$ ? The sensitivity analysis would document the nuances of these different variations and any significant findings they revealed.

#### *Impacts of Future Diversions and Increased Consumption*

44e Future water demands need to be considered in the Flaming Gorge Dam model. In Chapter 4, Section 4.19.1, the Flaming Gorge Dam DEIS (2004) states, “The Flaming Gorge Model assumed that water development in the Upper Green River Basin and the Yampa River Basin would continue at the rate projected by the Upper Colorado River Commission.” The DEIS then continues, “it is uncertain what resource impacts would occur as a result of future water development in the Green River Basin above and below Flaming Gorge Reservoir.” Considering that the Affected Environment (Chapter 3) and the Environmental Consequences (Chapter 4) depicted in the DEIS are based on the results of the Flaming Gorge Dam model, it is disconcerting to read that no “What if”



scenarios were performed to examine impacts from future water diversions and increased consumption.

The need to examine reduced flow scenarios is justified by the Final Biological Opinion on the Operation of Flaming Gorge Dam where the U.S. Fish and Wildlife Service (1992) determined that flow depletions from the Duchesne and Green Rivers caused by the Strawberry Aqueduct and Collection System, “would likely jeopardize the continued existence of the endangered Colorado pikeminnow and humpback chub.” This Biological Opinion included a Reasonable and Prudent Alternative stating that, “Flaming Gorge Dam and Reservoir would compensate for those depletions and be operated for the benefit of the endangered fishes in conjunction with its other authorized purposes.” The concern raised by the Biological Opinion is, “What happens if the water in the reservoir isn’t enough to compensate for depletions?”

A wider range of flow scenarios for modeling must be considered to protect and assist in recovery of the populations and designated critical habitat of the four endangered fishes. Further use of the Flaming Gorge Dam model will be needed to adequately explore how future water diversions, increased consumption, and depletions from the Green River will alter the two alternatives considered in the DEIS. Without considering the potential impacts that less water in the system will have on the two alternatives, the alternative selection process is incomplete. It is imprudent not to evaluate the two alternatives under reduced flow conditions because the model’s results, based on reduced flow, may negate the feasibility of one or even both alternatives. It would be disappointing to complete the entire Flaming Gorge EIS process, select the preferred alternative, and then have it become infeasible because increased diversions and consumption produced insufficient water availability for its implementation.

## **CONCLUSION**

Although the Bureau of Reclamation has made substantial progress in identifying and addressing the many impacts associated with the two alternatives, the Operation of

Flaming Gorge Dam DEIS in its current form was found deficient in three technical areas:

1. Groundwater Impacts

The alternatives considered in the DEIS will increase the flows of the Green River, resulting in increased infiltration and a potential impact on the groundwater system. Further modeling of the groundwater system, in regard to the Action and No Action Alternatives, will be needed to better understand how the increased flows will likely impact the basin groundwater.

2. Sensitivity Analysis for Models

Much of the work completed for the Flaming Gorge DEIS involved sophisticated modeling of the Flaming Gorge Dam and downstream reaches. Evaluation of the model's robustness by means of a sensitivity analysis of key parameters was not included in the DEIS. The lack of parameter sensitivity information for any of the models used in the DEIS casts a shadow of uncertainty on the results discussed. Completing and providing a documented sensitivity analysis is necessary not only to help in validating the model's results, but also in supporting the conclusions derived from those results.

3. Impacts of Future Diversions and Increased Consumption

The need to examine in greater detail scenarios of reduced flow is justified by the Final Biological Opinion on the Operation of Flaming Gorge Dam where the U.S. Fish and Wildlife Service (1992) determined that flow depletions from water resource projects, both up and downstream, would likely jeopardize the continued existence of endangered fish. Further use of the Flaming Gorge Dam model will be needed to adequately explore how future water diversions, increased consumption, and depletions from the Green River will affect the two alternatives considered in the DEIS.

I request that the Bureau of Reclamation consider these recommendations and assimilate the needed information into the Final Environmental Impact Statement.

## 6.0 REFERENCES

World Climate. (2004). Climate Data for 40°N 109°W. Available [Online]:  
<<http://www.worldclimate.com/cgi-bin/grid.pl?gr=N40W109>>, September 26, 2004.

U.S. Fish and Wildlife Service. (1992). Final Biological Opinion on the Operation of Flaming Gorge Dam. Fish and Wildlife Service, Mountain-Prairie Region, Denver, Colorado, November 25, 1992.

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## **44. TED E. KULONGOSKI**

### **44a**

Reclamation believes that no significant difference exists between Action and No Action Alternatives for groundwater and surface water interactions along the Green River downstream from Flaming Gorge Dam.

### **44b**

Sensitivity analyses with regard to specific parameters were reviewed by the modelers during Flaming Gorge Model development. Sensitivity to forecast errors, depletion schedules, and specific policy rules were evaluated during the formulation of the Action and No Action rulesets. In terms of the presentation of the model results, however, sensitivity analysis was not included in the EIS.

### **44c**

Changing inputs would change the results of the hydropower model, but most inputs are defined by the operations of the powerplant.

### **44d**

The EIS used a discount rate of 5.5 percent to estimate present value of the hydropower analysis with the given results. Use of a lower interest rate would increase the present value of both alternatives by roughly the same amount, and increasing the discount rate would have the opposite effect. The net difference between the two alternatives would be slightly different with another discount rate, but the percent difference would be approximately the same. For example, using a discount rate of

6.125 percent, a difference between alternatives would be \$18.3 million; using a discount rate of 4.875 percent, the difference is \$21.7 million, with still about 5 percent difference between the two alternatives. Therefore, the hydropower model lacks sensitivity to the interest rate.

The hydropower model used hourly forecasted prices, not average prices. Changing the hourly prices by a given amount would not affect the results as an increase of \$5 per megawatthour would have the same effect on both alternatives. However, an asymmetric change to prices would impact the results depending on how the prices were changed. For example, arbitrarily changing prices such that peak prices would be reduced would decrease the net value of the Action Alternative since this alternative generates less energy. An infinite set of prices could be generated, each changing the results in a unique way. The price set that was used was independently generated by a group not connected with the analysis or operation of the powerplant.

### **44e**

Future water development was assumed in the analysis of the Action and No Action Alternatives. The Flaming Gorge Model incorporated increasing future depletions that were equivalent to the rates of depletion projected by the Upper Colorado River Commission (memo: dated December 23, 1999 entitled "Estimates of Future Depletions in the Upper Division States"). Analyzing the impact of future depletions is not within the scope of this EIS.

## Memo

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**To:** Mr. Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager, PRO 774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, Utah 84606-7317

**From:** Heather Kuoppamaki, E.I.T.  
Environmental Resources Student  
Humboldt State University  
1 Harpst St.  
Arcata, Ca 95521

**Subject:** Comments on Flaming Gorge Dam DEIS.

### **Summary:**

The comments on this DEIS are made by Heather Kuoppamaki, an Environmental Resources Engineering senior and E.I.T. at Humboldt State University, California. My emphasis in engineering includes river restoration. Due to this and my continued interest in river health, I have chosen to comment on this DEIS. There are portions of the Draft EIS which overlook important aspects of the project. These portions are summarized below, and presented in further detail later in this memo.

General problems with the DEIR include:

- Formatting –
  - The formatting of the report makes it difficult to locate information. Rewording of section 4 from “Environmental Consequences” to “Impacts” would follow the recommended format for NEPA.
  - As well, there is no section or subsection for “mitigation”; this is a fault that continues throughout the entire DEIS as little to no information on *mitigation is mentioned*.

- Significant jumps of information occur throughout the document. For example, in the “Environmental Consequences” section, the logic which allowed for sediment transport increases to be considered insignificant is not included in the report.
- A summary of abbreviations page, as well as a glossary would, make reading of the document easier. These should be included to meet the average reader comprehension requirement.
- Alternatives - The reasons for having only one action alternative are not convincing. Many alternatives should be addressed before making a final decision on the new flow release schedule of the dam.
- Exclusion of details included in the 1992 and/or 2000 studies - Often throughout the document, statements were made based on the 1992 Biological Opinion Report (BOR) and/or the 2000 Flow and Temperature Recommendations (FTR). It would have been very helpful to include relevant sections, or at least the executive summaries, of these documents in the DEIS appendices.
- Mitigation - There does not appear to be any funding for future mitigation, including increased costs of operation and maintenance, clearly stated in the DEIS. Most impacts are stated as being non-significant but will be addressed if necessary. Who will perform ,and how this mitigation will occur, is not addressed through the DEIS.
- Environmental Consequences – As mentioned above, the “Environmental Consequences” section should be renamed to Impacts. Throughout the environmental consequences section, negative environmental consequences are mentioned briefly without any mitigation measures. This occurs throughout this section of the document and should be addressed prior to finalization.

**Purpose and Need Statement:**

The purpose and need statement is outlined as follows:

“The purpose of the Proposed Action is to operate Flaming Gorge Dam to protect and assist in recovery of the populations and designated critical habitat of the four endangered fishes, while maintaining all authorized purposes of the Flaming Gorge Unit of the CRSP, particularly those related to the development of water resources in accordance with the Colorado River Compact.”

The purpose and need statement limits potential alternatives by stating that **all** authorized purposes of the Flaming Gorge Unit of the CRSP must be maintained. For example, an alternative which is eliminated from further study is the total dismantling of the dam and reservoir system. Because the purpose and need includes the maintenance of all authorized purposes of the Flaming Gorge Unit, dam removal is not examined, when in this case it may be the best alternative for the health of the river and the endangered fish species located within the river.

**Alternatives:**

- The alternatives section should provide more detail into alternatives that were considered yet not proposed.
- Further detail into varying dam operations (which were as a group, disregarded) would increase the validity of the two alternatives selected. Information regarding what dam operations were examined, and how they fit into the alternative section would be useful.
- 45a • In the action alternative, why are flows in Reach 2 met first, with changes to the flow regime if necessary to maintain flows in Reach 1? As mentioned in the FTR, Reach 1 is the most significantly affected by flows from Flaming Gorge Dam, while flows in Reach 2 are significantly affected by its tributary, the Yampa River.
- 45b • The Modified Run River Alternative appears to be disregarded without enough analysis, because the inflows are too variable due to agricultural water storage,,

which lets water back in to the river months later. It seems reasonable that with analysis of a few gages upstream of Flaming Gorge Reservoir, actual inflows could be interpolated.

- 45c • Timing of the peak flows should be addressed in further detail. Table 2-1 of the DEIS details duration of peak flows. How these peak flows occur relative to each other may be an important issue for fish habitat as well as natural river restoration.
- 45d • A study of more than two alternatives would add to the validity of this EIS. The no-action alternative would not meet the Endangered Species Act and is therefore, for the most part, unreasonable. Analysis of further actions which would meet the Endangered Species Act requirements would increase the substance of the EIS. The remainder of the DEIS appears “stunted” due to the limitation of, basically, no alternatives. In the 2000 report, it is suggested that varying flows each year would allow for the best long term improvement of the river. An alternative which addresses altering the patterns used during low, medium, and high flow years, could address this issue. Perhaps further alternatives with altering flow schedules could be addressed in the alternatives section.
- Allowing for changes in the flow regime during the year would allow for more alternatives. This would also increase management options when the incorrect flow regime is put in place for the year. I was raised near the Folsom, California reservoir and remember numerous years when the incorrect flow regime was scheduled, and reservoir levels at the end of the season were drastically low.
- 45e • A maximum number of consecutive years where the minimum flow regime is allowed should be included in all alternatives. Numerous sequential years of low flow could drastically alter the downstream aquatic environment.



### **Affected Environment**

The affected environment is discussed in detail; few substantive comments are made in this section of the DEIS. However, on Figures 3-1 and 3-2, a scale is missing but necessary. This would enable further analysis of the figures with respect to algae blooms.

45f Tables 3-2, 3-3, 3-4, 3-6 should include pre-dam temperatures for reference. Figure 3-4 should also include a pre-dam temperature regime for reference.

### **Environmental Consequences**

As mentioned above, this section should be renamed "Impacts" for clarity and to follow the NEPA recommendations. As well, increased usage of the terms "significant impact" and "insignificant impact" would follow NEPA guidelines better. These terms would allow the reader of the document to find conclusions to the findings very easily and understand what the conclusions are.

### **Sediment Transport**

Increased loads of sediment transport are mentioned as an expected effect of the Action alternative. Reach 1 is expected to increase by 13,000 tons; Reach 2 is expected to  
45g increase by 100,000 tons; and Reach 3 is expected to increase by 250,000 tons. Without any supporting information, these increases are expected to have no change on the channel morphology. Information on the process by which this conclusion was reached would be very helpful. It is possible that this increase in sediment load would be *beneficial to altering the channel for increased fish habitat*. Mentions of the expected outcomes of this effect should be included, as well as necessary mitigations.

### **Agriculture**

In the agriculture section, numerous negative effects of the Action alternative are mentioned. At the end of this section, these potential effects are disregarded, and no mitigations are initiated. The Action alternative may not be the sole action responsible  
45h for economic damages to the agricultural sector, but this does not excuse or exempt that portion of environmental damage that the Action Alternative does cause. Economic

damages by the Action alternative should be mitigated so they can be considered less than significant.

### **Vegetation**

More impacts are associated with the possible increased occurrence of non-native as well as invasive species. According to the report, invasive species would likely increase, but  
45i mitigation again is not mentioned. These impacts should be addressed in more detail. Are the increased flood occurrences due to the Action alternative mitigatable? Are mitigations a necessary concern for this, and why or why not? Discussion of these questions would be very useful.

### **Threatened and Endangered Fish**

This section appears to include strong information for the decisions reached. To aid the  
45j average reader in the comprehension of this section, include a figure which depicts the predicted inundated flood plains for each of the flow regimes.

### **Terrestrial and Avian animals**

45k Further analysis of why the action and no action alternatives have no impact on avian or terrestrial creatures would increase the validity of the report. Since variations in vegetation are expected from the action alternative, effects on fauna are probable.

During further analysis of the impacts on terrestrial and avian animals impacts to “terrestrial wildlife” are expected for a period of time which is not defined. A change in species present may occur through this time of re-equilibrium. Mitigations for this period of time should be implemented so that more animals are not added to the endangered species act. During the time of imbalance, measures should be implemented to promote native animal health and diversity.

**Other Threatened or Endangered Species***Southwestern Willow Flycatcher*

The Action alternative may temporarily decrease habitat of the Southwestern Willow  
45l Flycatcher. If this species is endangered, any negative effects must be mitigated.  
Further, if flood flows are large enough, short term effects will be offset by long term  
habitat development. What happens if the flood flows are not large enough? Are there  
any mitigation plans for this possibility?

Overall all of the threatened or endangered species should have a plan for habitat  
mitigation in case the Action alternative does negatively affect their lives. This would  
decrease the time necessary to determine the mitigation plan once negative effects are  
noticed.

**Cultural Resources**

In section 4.8.2.2, the effects of the action alternative are stated. Effects from  
implementation of the new flow regime appear to be minor with the exception to flooding  
certain historic areas in Reach 1 in the Browns Park Area, which may receive more  
45m flooding and longer inundation if the Action alternative is selected. Is it not important to  
do whatever possible to preserve these historic areas, even though it has experience  
potentially harmful events in the past?

**Addressing Uncertainties through Adaptive Management**

This was the first section where any mention of mitigation occurred. Further explanation,  
of the research and adaptive management practices which would occur, would be  
beneficial. Particularly, what sort of research is going to occur in the near future, who in  
the dam operations will be responsible for implementing the management plan? Would  
45n there be a special team included in the dam operators? Would the people chosen to  
perform these duties have certain background characteristics to ensure proper research  
methodology?

**Environmental Commitments**

This section, as well as the above section, should be renamed to include the word “mitigation measures”. This would increase the flow of the document and follow NEPA guidelines a little closer. As well, referencing of this section during analysis of the environmental consequences would allow the reader to examine the “mitigations” to be implemented for the negative impacts.

Specific economic means which Reclamation will use to perform all of the monitoring and adaptive management schemes presented should be discussed.

**1992 Biological Opinion Report**

This report should be either included in the DEIS as an appendix, or linked to the DEIS. A further analysis of the 1992 Biological Opinion Report would allow me to discuss the significant of the conclusions of the report and analyze the action alternative. Without the inclusion of this report, the DEIS is incomplete as all the determining factors are not accounted for. I would be even more beneficial to the outside person reviewing the report if a summary of the information related in this report were included as a section of the DEIS.

**2000 Flow and Temperature Recommendations for the Green River, Downstream of Flaming Gorge Dam**

As with the 1992 Biological Opinion Report, numerous references to the 2000 Flow and Temperature Recommendations are made. Often in the document, conclusions are determined. It is assumed that these conclusions are made at least in part due to the findings of the FTR. Whenever applicable, the FTR should be referenced with a section number so that concerned individuals have the opportunity to examine the methodology. Since the action alternative is highly based on the information portrayed in this report, and the report formatting makes writing/reading difficult a concerned individual such as myself cannot fully evaluate the action alternative without the report.

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## 45. HEATHER KUOPPAMAKI

### 45a

In the 2000 Flow and Temperature Recommendations, the following statements are made which support using Reach 2 as the priority reach:

- ❖ Section 5.2.1 “Recommended flows for Reach 1... are those measured at the USGS gauge near Greendale, Utah, and are, for the most part, release patterns from Flaming Gorge Dam needed to achieve the target peak and base flows identified for habitats of the endangered fishes in Reaches 2 and 3.”
- ❖ Section 5.2.1 “Base flows in Reach 1 should be managed to ensure that within-year and within-day variability targets for Reach 2 are met.”
- ❖ Table 5.4 General Recommendations: “Peak flows in Reach 1 should be of the magnitude, timing, and duration to achieve recommended peak flows in Reaches 2 and 3.”

Throughout the 2000 Flow and Temperature Recommendations document, it is stated that the critical habitat for the endangered fish reside in Reaches 2 and 3. This is also stated in the EIS. Through modeling, Reclamation came to the determination that it was possible to reasonably predict future flows in Reach 2 with enough precision to efficiently augment these flows to achieve the target levels established in the 2000 Flow and Temperature Recommendations for Reach 2.

### 45b

The Modified Run of the River Alternative releases on a daily basis during the spring would be a percentage of the previous day’s unregulated inflow. In this way, the release regime would closely match the inflow regime. By varying the percentage from a low percentage of up to 100%, we could test

the reaction of the reservoir in terms of reservoir storage. Because of the narrow scope of this EIS, the Modified Run of the River Alternative had to achieve all of the flow objectives of the 2000 Flow and Temperature Recommendations in Reaches 1 and 2 of the Green River in the same way that the Action Alternative did. The suggestion regarding the use of data from upstream gauges is unclear, but absence of inflow data was not the reason that this alternative failed to meet the purpose and need.

The Modified Run of the River Alternative did include unregulated daily inflows to Flaming Gorge. These values were used to determine what each daily release would be. Perhaps this comment refers to natural flow. It is possible to roughly estimate natural flow from actual measurements; however, the computation of natural flows is a very complex and involved process, and this work has been done on a monthly time scale but not on a daily time scale.

Based on sensitivity analysis of the percentage rate, it was found that the flow objectives could not be met even when the percentage was set to 100%. There were two main reasons for this result. First, water consumption and diversion above Flaming Gorge Reservoir reduced the measurable unregulated inflow. Second, the timing of releases from Flaming Gorge Dam under this regime were not optimally timed with the flows of the Yampa River.

### 45c

Decisions regarding the timing, duration, and magnitude of peak flows within a given year under the Action Alternative would be made with input from the Technical Working Group, which will evaluate criteria listed in table 2-5 of the EIS when making recommendations. This allows opportunities to refine flow attributes based on an adaptive management process.

**45d**

The purpose and need of this EIS is limited to alternatives that implement the 2000 Flow and Temperature Recommendations while maintaining and continuing the authorized purposes of the dam. Reclamation acknowledges that a full range of reasonable alternatives is desirable. However, despite considerable effort to develop additional alternatives that meet the purpose and need of the EIS, additional viable action alternatives could not be identified. Please see sections 1.4.5, 1.4.6, and 2.2 of the EIS.

**45e**

The target flows and durations to be achieved each year are dependent on the natural hydrograph of that year and the hydrological classification of that year. If 6 consecutive drought years occur in a row, as is currently the case, then only low targets and durations would be achieved. In very wet years, high targets with long durations would be achieved.

**45f**

The scales are a measurement of Chlorophyll a in micrograms per liter ( $\mu\text{g/L}$ ). The red scales are for concentrations greater than  $27 \mu\text{g/L}$ ; and in fact, they can reach several hundred  $\mu\text{g/L}$  or hyper-eutrophic status at times in the red zones. The scale was clarified in the figures and in the text. Pre-dam temperatures below Flaming Gorge reached about 23-24 °C in the summer and near freezing during the winter. The pre-dam temperatures were warmer at the peaks in the summer than now occur.

**45g**

The resulting changes in average annual sediment transport will likely produce some channel morphological changes in Reach 1. For example, increased local erosion of bank materials could lead to channel widening in some portions of Reach 1. In Reaches 2 and 3, the increases in sediment transport

conditions, on a percentage basis, under the Action Alternative relative to No Action conditions, are relatively smaller than the changes anticipated for Reach 1. For these conditions, changes in channel morphology due to increased sediment transport are anticipated to be subtle and will likely be difficult to track. See the Effects of Flaming Gorge Operations Under the 1992 Biological Opinion and the 2000 Flow and Temperature Recommendations on Sediment Transport in Green River Technical Appendix for a description and a discussion of the sediment transport analysis completed for the EIS.

**45h**

The analysis of potential effects to agriculture (section 4.5) shows that there are not significant differences between the Action and No Action Alternatives.

**45i**

Recent research findings suggest that the proposed action may encourage a shift in location, but not an increase, in tamarisk establishment (see sections 4.7.5 and 4.19.6 in the EIS). The EIS more clearly reflects these new findings. One of the predicted benefits of this shift in establishment location would be positive changes to fish habitat. As a result of these new findings, Reclamation does not believe that mitigation for this action is warranted. However, unrelated to any effects of this action, Reclamation has recently supported research aimed at defining those microhabitats most likely to remain tamarisk free following mechanical removal. Any improvement in this arena may help Reclamation and other management agencies along the Green River more effectively control tamarisk as per Executive Order 13112 on Invasive Species, 1999.

**45j**

Please refer to figure 4-16 in the EIS; for more information. See figure 3-1 in Valdez, R.A. and P. Nelson. 2004, *Green River Subbasin Floodplain Management Plan*, Final Report to Upper Colorado River Endangered Fish Recovery Program, Denver, Colorado, Project No. C-6. This report can be obtained by writing the Recovery Program.

**45k**

The no effect determination for animals exploiting reservoir or river habitats was made because variations in the vegetative community attributable to dam operations would be slight and occur over a sufficiently long period that mobile terrestrial and avian communities could alter their ranges and habits in such a way that no appreciable change in population size or dynamics would occur to these populations.

Perturbations to the vegetative community (and, consequently, to the habitats of the animals in question) below the dam that are attributable to dam operations would not be extensive enough to cause the presence or absence of a species to change within the entire study area. The total area being discussed is large, and resources for these animals are abundant. Changes in the vegetative communities and associated wildlife habitats would be relatively localized and could contribute to a somewhat different composition of species within these areas.

**45l**

Flooding of the riparian zone is an important, natural, disturbance mechanism for recharging vegetation and resetting succession and the Action Alternative purposefully attempts to contribute to this process. Loss of vegetation is a part of that process. Reclamation believes that mimicking the natural hydrograph is a positive step in restoring and/or maintaining viable

southwestern willow flycatcher habitat. Since the identified territories are located on low elevation surfaces, inundation of nests by large flood flows would occur under either alternative.

Regarding the question of whether flood flows will be large enough to offset short-term effects, section 4.7.8.1.2 in the EIS has been rewritten to more clearly state our intent—that is, if large enough, flood flows should create additional habitat above and beyond that which would develop following any scour and deposition event.

**45m**

Reclamation recognizes the importance of potential disturbance to historic properties within the project area. Please see section 4.8.2.2 regarding cultural resource data analysis with the relevant land managing agencies.

**45n**

The adaptive management process described in section 4.20 of the EIS would rely on ongoing or added Recovery Program activities for monitoring and studies to test the outcomes of modifying the flows and release temperatures from Flaming Gorge Dam. Decisions regarding the timing, duration, and magnitude of peak flows within a given year under the Action Alternative would be made with input from the Technical Working Group which will evaluate criteria listed in table 2-5 of the EIS when making recommendations. This allows opportunities to refine flow attributes based on good science in an adaptive management process. See section 2.5.3 of the EIS describing the Technical Working Group and the Flaming Gorge Working Group and how they would work together in planning the flow prescription each year.

**From:** "Scott Marshall" <SMarshall@miscowater.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 11:26 AM  
**Subject:** Green River flow fluctuations - comments from a fly fisherman

Mr. Peter Crookston,

It has come to my attention that the Bureau of Reclamation is performing a draft Environmental Impact Statement (EIS) on the operation of Flaming Gorge Dam. I wanted to share some thoughts with you regarding my most recent trip to the Green River (below Flaming Gorge Dam) and how my experiences, along with similar stories of other anglers, should be considered before any decisions are made.

I am an avid fly fisherman and do my best to make it to the Green River at least twice per year to enjoy the fabulous trout fishery. My last trip to the Green River below Flaming Gorge was a bit unusual in that fluctuating river flows caused a negative impact on my experience and threatened my individual safety along with the other two fisherman in my party.

46a Unlike many anglers who visit the area, I prefer to fish the "B" section of the river and choose to walk in and camp at the USFS camp sites along the river. In all of my trips to the Green River, my friends and I enjoy wade fishing both sides of the river. In my most recent trip to the Green River (late June 2004), we arrived late in the day and barely fished the evening hatch before we turned in for the night. We woke up early the next morning to a beautiful sunrise and low water levels. We decided to cross the river in an attempt to fish the opposite side (west side) that generally receives less fishing pressure. We started out having a consistent day of catching trout. After lunch, water levels began to suddenly rise at which point several things happened: the fish stopped feeding and the route back across the river started to become more and more dangerous. If my memory holds, river flows were approximately 800 cfs in the mornings and increased to 1500 cfs in the afternoons and evenings. The river flow basically doubled during the early afternoon. The increased flow threatened our individual safety (if you don't think this is life threatening, cross the river at 800 cfs and then try and come back across when it is 1500 cfs - I have done it and it is very dangerous). The fluctuating river flows caused the fish to stop feeding (which reflected negatively on my experience) and threatened the physical safety of my entire group. I believe this to be consistent with all other wade anglers and most other float anglers. Personally, I will be keeping an eye on any changes in dam (flow) operation and will base my decision for any future trips on this aspect.

46b Thousands of anglers visit the Green River below Flaming Gorge Dam each year and have been doing so for many years. The thousands of dollars fishermen bring to the local economies are crucial to the survival of most people living in the area not to mention the wonderful experiences on the river that are shared with each generation.

46c In general, I support the single daily peak hump restriction but the timing should be in a manner to have no impacts on the river recreation activities - in my case (and thousands of others), specifically fishing. As I have witnessed in my last trip, increased flows made the fishing



very poor and threatened my personal safety.

I hope that you can come up with an amiable solution to the operation of Flaming Gorge Dam that will create no significant impacts to the fishery or the experience shared by thousands.

Sincerely,

Scott A. Marshall, P.E.  
Misco Intermountain  
3033 South Parker Road  
Tower I, Suite 350  
Aurora, CO 80014  
office (303) 309-6150  
fax (303) 309-6154  
cell (303) 601-5215

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## **46. SCOTT A. MARSHALL**

### **46a**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing

notification to the public of river fluctuations and other public safety concerns.

### **46b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

### **46c**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Jeff Martin" <bcstoneram@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Tue, Nov 30, 2004 6:26 PM  
**Subject:** Green River Flows

Hello,

*My name is Jeff Martin, I know you are probably very busy and I am grateful for your time in reading my email. I visit the Green River several times each year to enjoy the spectacular fishing that many take advantage of in our state.*

47a During this past year I have been very dissappointed in the quality of the fishing there due to the eratic changes in water flows out of the Flaming Gorge Dam. Many morings have started out great and then the water flows kick up and upset the fish, thus creating a very tough fishing situation. I realize that folks have got to have power, but to disrupt such an awesome fishing and outdoor recreation spot so that  
47b people can make more money on power generated from the increased water flows seems unfair. It is also a darn shame that a place with such a great reputation for fly fishing and recreation for so many people in this country and abroad is suffering such a huge blow. With the Snake River in Idaho, and so many other waters available in Wyoming, Idaho, and Montana I am afraid that continuing this practice in the future will end up being counter productive for our great state. I and many others will take our dollars to other states so that we don't have to deal with spotty fishing and dangerous conditions experienced on the Green so that people can generate more power.

The really sad thing here is that if you asked fly-fishermen in this state which river had the most fish per square mile, scenic beauty, and overall best fly-fishing for larger fish, you would find the majority would tell you the Green River. This isn't just any river to most fishermen, this is our Crown Jewel fishery. Why compromise this and give our state's fishing and recreation opprotunities a black eye?

I know you have to weigh things out, I just hope that you can sympathize with us in this regards.

Thank you for your time.

Sincerely,

Jeff Martin

Jeff Martin  
bcstoneram@earthlink.net  
Why Wait? Move to EarthLink.

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**47. JEFF MARTIN****47a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**47b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives.

We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** Jerry McGarey <bidss15@yahoo.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 10:38 AM  
**Subject:** Flaming Gorge Reservoir Draft EIS

**48a** Sir - I write today to express my dismay over the timing of power generation flow increases during prime fishing hours in the A section of the Green River below Flaming Gorge dam. Over the last couple of years (notably in 2004) the timing of mid-morning flow increases and mid-afternoon flow decreases is disruptive to trout feeding activity and had markedly impacted my enjoyment of this otherwise wonderful fishery.

I have travelled to the Flaming Gorge area several times a year since 1992, spending my money with local lodging, restaurant and fishing establishments. I would strongly urge you to factor the needs of the recreational fishing tourists into your plans and timing for summer power generation in the future.

**48b** I believe recreational use of the Flaming Gorge area is supposed to precede that of dam power generation, isn't it?

Respectfully, Jerry McGarey (bidss15@yahoo.com)

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<http://mail.yahoo.com>

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## **48. JERRY MCGAREY**

### **48a**

The issue of daily fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

### **48b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives.

We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** "Patrick M. Mehle" <smachine@sweetwater.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 10:43 PM  
**Subject:** Comments on Flaming Gorge Dam Operation DEIS

11-14-2004

To: Mr. Peter Crookston

Flaming Gorge EIS Manager, PRO-774

Bureau of Reclamation, Provo Area Office

Dear Mr. Crookston,

The following are my comments on the Flaming Gorge Operation Draft EIS.

49a In reading over the DEIS, it seems that there are two very conflicting assumptions made. On page 189, Section 4.8.1.1, is stated that "Fluctuations of the water levels of the reservoir would not change from what has become a normal, although flexible, operation". Conversely, on page 230, first column, it is seen that "Because of increasing water consumption in the tributaries of the Green River below FG Dam, it is anticipated that releases... will have to be greater in the future." Just two paragraphs after that we see that "Water consumption above FG Dam is also expected to increase, and this could reduce inflows into FG Reservoir." It is clearly impossible to have more water going out, less water coming in, and still maintain a "normal" lake level.

For this reason alone, I feel that there is much more that needs to be done to achieve a workable operations plan. I am a member of the Wyoming Water Development Commission's Green River Basin Advisory Group. Over the course of the last several years and twenty-five or more meetings-I have lost count of how many- our group has been exposed to many diversified points of view, and has had the opportunity to hear from many different expert and credible speakers. From this experience I have come to the conclusion that there are several points that you need to consider in greater detail. First is the issue of drought. As you probably are aware, the Colorado River Compact

annual flow figures, as seen in the original compact agreement, have proven to be lower than reality. Further, recent studies of tree rings going back to about 1200 AD, have conclusively shown that the past 100 years have been exceptionally wet. Also mentioned was yet another study concerning the Wind River Glaciers. These glaciers have been receding rapidly over the past several decades, and assuming continuation of the current drought conditions and warmer mean temperature trends, it is possible that the glaciers could be completely melted in ten years. These glaciers are the primary source of summer stream flow in the upper Green River Basin. The "demise" of these glaciers could realistically lead to the Green River actually running dry-- in the worst case scenario. The Wyoming Water Development Commission considers conditions serious enough to where they feel a need to develop an emergency plan to address issues of continuing severe/ exceptional drought. I think that your EIS should address this possibility also.

49b

Also at issue is the continued increasing demand for water downstream. Lake Powell was at 58% of capacity in October. It is surely even lower now. If current trends continue, the lake elevation will drop to the point where the generators will have to be shut down in mid 2006. It is speculated that upstream dams might be forced to lower their lake levels to supply enough water to forestall that shutdown. I highly oppose a transfer of water under those conditions. There is an old saying among airplane pilots-"The two most useless things to a pilot are runway behind you and altitude above you". For a dam operation, it can be said in the same vein that the two most useless things to power generation are water downstream and dam elevation above lake level. It is fine to send water downstream for power generation since the same water can be used several times to spin several turbines. The issue is efficiency. Any water sent down to Lake Powell will be sent through their power plant at minimum head, hence minimum efficiency. It makes no sense to operate Flaming Gorge at a reduced elevation/reduced efficiency. Keeping Flaming Gorge as full as possible will give the greatest possible gross power production for the system as a whole.

49c

I wish also to express concerns for the implementation of increased flows the endangered fish recovery program. The potential damage to FG Dam caused by increased flows through the spillway is, in my opinion, much underestimated, as are the safety issues that would result. Although the fish recovery efforts are a worthy goal, the flows required to achieve this goal do not justify the costs. The physical damage to the dam, the loss of electrical generation, the erosion damage to downstream infrastructure, and the flood damage to downstream landowners, far outweighs the benefits. It is interesting to note that the water required for a single "flushing" is on the same order of magnitude as the total annual domestic water consumption for the entire state of Wyoming. I am left with the feeling that this proposal will, at best, just serve as a vehicle to benefit the over-allocated lower basin at the expense of the upper basin States. How can these costs be justified?

49d



- 49e Finally, I would like to suggest that you consider formulating a priority list for the operation of the dam. First, of course would safety- both for the dam itself and for the public that it serves. Second would be the dam's original purpose-to serve as an instrument to help regulate the Colorado River System per the Compact. Of the several priorities that you might feel would follow these, the endangered fish recovery flows should place well toward the bottom of the list-especially if the hydrological conditions that existed hundreds of years ago should prove to be the true average.

Thank you for the opportunity to express my views on these important issues.

Patrick Mehle

1037 Cypress Circle

Rock Springs, Wyoming

82901

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## **49. PATRICK M. MEHLE**

### **49a**

The Action Alternative does not necessarily release more water than the No Action Alternative. In some cases, the Action Alternative would release less water. It is recognized in the EIS (section 4.16.1.1) as water consumption increases through time that it will become more difficult to maintain reservoir storage while also achieving the flow objective of the 2000 Flow and Temperature Recommendations.

### **49b**

Comment noted; there is at present a drought in the Green River Basin. The hydrology that was analyzed for this EIS did include droughts more severe than the present drought.

The Flaming Gorge Model was run with historic hydrology from 1921 through 1985. During this period, several droughts did occur; the worst of which occurred from 1934 to 1938 when the average annual Green River flow (measured at Greendale, Utah) was 550,000 acre-feet. For comparison the average annual flow of the Green River from 2000 to 2004 was 661,000 acre-feet.

### **49c**

Comment noted. Lake Powell operations are outside the scope of this EIS.

### **49d**

Comment noted. As stated in section 2.5.3.2 of the EIS, Reclamation would annually coordinate the decision whether to use the bypass tubes or spillway to meet particular flow targets. That same section, and other sections in the EIS, note uncertainties associated with use of the spillway that will have to be monitored and addressed through the adaptive management process.

### **49e**

As stated in section 1.5 of the EIS, Reclamation's priorities are first, dam safety and then second, meeting project purposes in compliance with ESA. When conflicts in operations arise, Reclamation's approach to conflict resolution and decisionmaking includes accepting input from all stakeholders and formulating a strategy that meets the most needs possible consistent with these established priorities. Reclamation's intent is to continue balancing the needs of all resources when making operational decisions and would continue this practice under both the Action and No Action Alternatives.

**From:** norman miller <nmlillerca@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 6:49 PM  
**Subject:** Flows on Green River

Dear Sir;

**50a** The high afternoon flows experienced on the Green River this year made what had always been a top fishing destination, an unneeded and unwanted adventure. Please restore sanity and safety to the flows so that the great fishing experience and return once again.

Thank you,

Norman Miller

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## **50. NORMAN MILLER**

### **50a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** <Richardmimms@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 8:23 AM  
**Subject:** (no subject)

**51a** We support the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing.

Richard L. Mimms

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## **51. RICHARD L. MIMMS**

### **51a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Arthur Moeller" <moellerad@comcast.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 6:26 PM  
**Subject:** Draft Environmental Impact Statement on Flaming Gorge Dam

I do not favor the proposed fluctuating flows for power generation. I  
52a feel it will have a negative impact on the fishing. I fish there  
several times a year and if I have to put up with the fluctuating flows  
I will consider going elsewhere and spending my money in a different  
52b location. I could support the single daily peak hump restriction if it  
was timed in a manner that does not impact river recreation activities,  
52c especially fishing. I would also feel safer while wading if I did not  
have to worry about the river rising suddenly.

A. D. Moeller  
4247 W. 4570 So.  
West Valley City, UT 84120

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## **52. ARTHUR D. MOELLER**

### **52a and 52b**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

### **52c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for

sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.



**From:** "Mark" <marco@wfmis.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 8:24 AM  
**Subject:** Green River at Dutch John River Flow Impact

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317

- 53a** I support the single daily peak hump restriction, but its timing should be in a manner that has no impacts on river recreation activities, especially fishing. It is dangerous to the fisherman wading across the river, spoils the fishing and will keep many of us who bring the much needed dollars to the local economy of Dutch John and the State of Utah. In addition it is the recreational users who have priority over the power generation.
- 53b**

Mark Naccarato  
Holladay, UT.

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**53. MARK NACCARATO****53a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

**53b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power

generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS. Please see response to individual letter 38 above.

**From:** "Sean O'Connor" <SOConnor@sheppardmullin.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 6:01 PM  
**Subject:** Draft Environmental Statement on the Operation of Flaming Gorge Dam

I understand that the Bureau of Reclamation is undergoing a Draft Environmental Statement on the Operation of Flaming Gorge Dam and asking for comments.

- 54a** I fly fish the Green River often, and it is frustrating how the erratic way flows can suddenly jump up and down while I am fishing. This can often disrupt water quality and upset the fish for set periods of time. The end result is a spoiling of our fishing day. The Draft EIS allows for fluctuating flows for power generation up once a day and then down. In 2004 this was experienced by many of us on the Green as they went from 800 cfs to 1500 cfs every day (at 1:00 pm, right in the middle of the day) after our high flows in early June to the end of September. We hated the reaction from the trout, the fishing could and often did go flat for periods of time. Then they brought the flows down while we were trying to start fishing again and the process started again. The ups and downs and the disruption you caused to our fishing experiences were uncalled for. You have the ability to do the power generation flows in non-fishing hours or maintain a slightly higher steady flow that
- 54b** generates the same amount of electricity.
- 54c** Recreation and fish have a priority over power generation under the authorized purposes of the Flaming Gorge dam. Please recognize this and act accordingly.

Sean P. O'Connor

DD: (714) 424-2846

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## **54. SEAN P. O'CONNOR**

### **54a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative.

### **54b**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 above.

### **54c**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

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**MEMORANDUM**

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**TO:** PETER CROOKSTON  
Flaming Gorge EIS Manager, Pro 774  
Bureau Of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, Utah 84606-7317

**FROM:** MAURIA PAPPAGALLO,  
Environmental Resources Engineering Student  
Humboldt State University  
1<sup>st</sup> Harpst St, House 18  
Arcata, CA 95521

**SUBJECT:** COMMENTS ON FLAMING GORGE DAM DRAFT EIS

**DATE:** 11/13/2004

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**SUMMARY**

This memo is to inform you of my analysis of the Operation of Flaming Gorge Dam Draft Environmental Impact Statement (DEIS). The critique is broken into sections covering overall document suggestions, analysis of alternatives, the affected environment, and environmental consequences. Overall, I found the document to be a good examination of the situation.

**DOCUMENT SUGGESTIONS**

The beginning of the document should be revised; information in chapter three should come before the alternatives are assessed. The following are examples:

55a

- A summary description of the natural habitat and environment of the endangered fish should be introduced before alternatives are discussed. The summary description should include at least their average water temperature and flow requirements. A description would also inform the reader of vital information needed to assess the flows recommended by the alternatives.

- A thorough description of the Green River System (GRS) should be introduced earlier. A description at the beginning would help the reader become more familiar with the system and point out important details that can not be obtained from glancing at a map. For example, on page 19 of Chapter 1, the Browns Park Highway EIS is discussed, but the document does not indicate why this is relevant information. An earlier GRS description should state where the Browns Park Highway is and why it's important enough to be discussed in relation to the Flaming George Dam project. A full description is given in 3.6.2, this but is too far into the document; a summary should be given in the beginning.

The background of the dam situation includes authorized uses of the FGD project. Due to the authorized uses being an important part of the purpose and needs statement, they should be identified in the Purpose and Needs section and could be put into easy-to-read bullets.

Inclusion of, or reference to, important sections of the 2000 Recommendations report and the 1992 Biological Opinion as appendices to the document, would be helpful in assessing the processes used to determine the recommendations. The important sections should list the criteria used for making decisions in each report, or should list the assumptions used in the modeling analysis. Furthermore, referencing appendices within the text would direct the reader to additional information on important subjects.

55b The overall language of the DEIS is easy to read. A few words are not defined, but would help the reader to better understand the document. One example is the "bypass tubes"; an explanation of what they are and how exactly they affect power generation is needed. The quantity of bypass tube use is discussed as a comparison between the two alternatives but it is not clear what that means.

55c On page 142, in the last paragraph, where temperature changes are discussed, data should be re-evaluated and checked; it is not possible for 9°F to equal 5°C. The same mistake is made again on page 144 in the first paragraph.

- 55d A discussion of the operation and maintenance for the new operating plan should be included in the document. Where will the funding come from, and who is responsible for the maintenance and operation of the operating plan?

#### SCOPING

- From the scoping process, public issues were identified and separated into categories. The process was conducted under the question: "How would operating the Flaming Gorge Dam to meet 2000 flow and temperature recommendations affect..."
- 55e Conducting the scoping process under this heading defeats the purpose of scoping. Scoping is conducted to look at the issues that should be included in the alternative development and impact analysis. This question limits the scoping process and produces "tunnel vision" in determining the alternatives. To improve this analysis, the scoping process should not have been so narrow and the indicators should include measurable descriptions. For example, an indicator for Issue 8 is "condition of vegetation and species composition of wetlands". Instead it should say "population density of vegetation, acreage and condition of wetlands and their species composition". This wording allows for measurable conclusions. The following additional indicators should be similarly reworded:

- Issue 9, Effect on vegetation: Number and density of endangered plant species.
- Issue 13, Effects on sediment: Look at the predicted changes in salmonid spawning gravel areas. "Area of spawning gravels before new flows and predicted spawning gravel area after implementing new flows".
- Issue 15, Effects on quantity and quality of water: Changes in temperature

#### ALTERNATIVES ANALYSIS

The purpose and needs statement discusses two main points: 1) the need to operate the dam to protect and assist in recovery of four endangered fish species and their critical habitat, and 2) to maintain all authorized purposes of the Flaming Gorge Unit of the Colorado River Storage Project (CRSP). To fulfill both points, the only feasible alternative would be to implement the 2000 Recommendations. Thus the alternative formulation for this project should include alternative flow regimes, as well as the 2000

Recommendations, with differing alternatives for impact mitigations along with looking at a no action alternative. The alternatives discussed in this analysis focus on the flow regimes instead of mitigations. Two alternatives are discussed, an Action alternative in which the 2000 Recommendations are implemented, and a No Action alternative. The No Action alternative follows flows recommended by the 1992 Biological Opinion.

The action alternative splits the Green River into three different reaches, with each being affected by the FGD flows differently. It is stated on page 24 in the last paragraph that:

*“The intent of the Action Alternative is first to meet the recommended objectives for reach 2 and then, if necessary, make adjustments to releases so that the recommended objectives for Reach 1 could also be met. It is assumed that the flow objectives in Reach 3 are met whenever the flow objectives in Reach 2 are met.”*

- 55f This statement leaves me with a number of questions; 1) What are the recommended objectives for each reach, 2) Why are they different? These should be stated in section
- 55g 2.3.2 before this statement is made. 3) How can the assumption be made that the
- 55h objectives in Reach 3 are met when the Reach 2 objectives have been met? An explanation of this assumption needs to be included in this section. The following paragraph on page 26 goes into further detail of the 2000 Recommendations. This paragraph then states that the primary focus of the 2000 Recommendations is on the flow regimes in Reaches 2 and 3. The two statements seem to contradict themselves. Why not
- 55i focus on Reach 1, the section of the river that is predominantly affected by the dam releases?

- 55j In continued discussion of the action alternative flows, it is mentioned that by trying to reach 2000 Recommendations for Reach 1, that the minimum 2000 Recommendations would then be exceeded in the following reaches. Due to agricultural needs, I can understand why water conservation is an important goal. However, based on the purpose and needs statement, exceedence of minimum flows is a positive impact and a benefit to the fish.



When comparing the two alternatives under the context of agriculture, the impacts are stated as the same whether the No Action or the Action alternative is used, thus these impacts are dismissed. The DEIS states that under both alternatives, approximately 245 acres of cropland will be flooded each year. The Action alternative will cause the fields to be inundated for 2 days longer which will not cause any more significant impacts thus the effects are the same. Though the impacts will be the same, they should still be addressed within the document.

55k

It is stated that the effectiveness of the action alternative will be measured by the long-term frequency of achieving flow thresholds prescribed by the 2000 Recommendations. The language should be changed to include a quantitative value for long-term. It is also stated that an administrative record of the operational decision making *would* be maintained and that this record *would* include analysis of previous operations and effectiveness of achieving desired targets on a year by year basis. The word *would* should be changed to *will* to ensure that this practice is done.

55l

55m

#### GREEN RIVER SYSTEM MODELING

The current description of the model analysis used to simulate the GRS doesn't provide enough detail. For example, the model requires natural flow volume inputs and estimates the release volumes and storage volumes. There is no discussion of how the natural inflows were chosen, or what range and number of hydrologic years were used in analysis. The language indicates that the model simulates the system to the USGS stream gauge 93 miles away from the dam, when the system being analyzed is 410 miles long? Is only one gauge used for calibration? Is the rest of the system included in the model? Further explanations should be used in the document. Placing this section within the Affected Environment chapter would increase the flow of the paper.

55n

I liked that the preparers of the 2000 Recommendations were asked to review the document. In most situations, the reviewers found that the model properly simulates the 2000 Recommendations in Reach 2. This would indicate that it does not properly simulate the 2000 Recommendations in Reaches 1 and 3. If this is so, it should be stated

55o

and further analysis should be done to find conditions that do meet Reach 2 and 3 goals. Important impacts to the system could be missed or overlooked due to this inaccuracy in modeling.

#### AFFECTED ENVIRONMENT

As mentioned earlier, sections from the affected environment should come earlier in the document, prior to the discussion of the alternatives.

Under the Potentially affected area (3.2), a section for the Green River needs to be included. Currently there is mention of the Green River downstream of the dam, but it only mentions that the dam is 410 miles before the confluence with the Colorado River.

#### VEGETATION

- 55p The section on vegetation (3.7.1.3) does not fully discuss the current environment in terms of the indicators previously stated in Issue 9 (Pg 14). Further detail on evasive species, numbers of populations including the flooded areas should be included. Further
- 55q more, in the environmental consequences section, no studies were conducted or references given to backup statements made on vegetation impacts.

#### ENVIRONMENTAL CONSEQUENCES

- 55r A value for the average influence of the Dam releases on each Reach of the system should be included in the analysis. An average percentage of overall river flow that comes from the dam releases in each reach would provide a good value. For example, on page 127, the statement “Impacts to flows from Flaming Gorge Dam diminish with *distance from the dam*”, as a reason for not including Reach 3 flows into the model. This statement should be supported with a value indicating that the effects of dam releases are minimal at that location.

#### TERRESTRIAL AND AVIAN ANIMALS

- 55s Discussion of terrestrial and avian animals does not include any type of study or analysis to back up the decision of no impact. Further analysis of terrestrial foraging and habitat should be analyzed to see if terrestrial and avian food sources will be impacted.

55t The overall discussion of mitigations is insufficient. It would be easier for the reader if the discussion of impact significance were discussed directly after impacts were presented. There is no discussion of how impacts are rated for significance. I found it hard to find mitigations or final decisions on significance. If there are proposed mitigations for effects caused by the action alternative, I did not find them.

#### UNCERTAINTIES

This section includes a discussion of the uncertainties included in the models and the assumptions that were required to make the models work. The assumptions and uncertainties with the models should be included earlier in the document with the discussions of information obtained from the model, thus allowing the reader to decide how well they agree with the information presented.

Inclusion of an adaptive management program will be very helpful in mitigating impacts of uncertain significance. The adaptive management program should include measurable and dated results. The wording on the adaptive management goals for numbers 6 through 10 should be changed from *would* to *will*. Using the word *would* indicates that it could happen. Due the number of uncertainties involved in the project the implementation of all aspects of the adaptive management program is very important to insure unrealized impacts are mitigated. A discussion of possible mitigations would further support the documents discussion of adaptive management.

---

## **55. MAURIA PAPPAGALLO**

### **55a**

Please see section 1.3 for an explanation of the EIS contents. The format is consistent with the CEQ and Interior regulations implementing NEPA.

### **55b**

Comment noted. The term, “bypass tubes,” was added to the glossary.

### **55c**

These references are not to specific temperatures, but to changes in temperature; thus a change of 9 °F is equal to a change of 5 °C.

### **55d**

Please see sections 1.5, 2.5, 4.19 and 4.20 for information regarding operations.

### **55e**

Comments noted.

### **55f**

The recommended objectives for each reach are flow and temperature targets defined by the 2000 Flow and Temperature Recommendations. Please see table 2-1 in the EIS.

### **55g–55i**

Throughout the 2000 Flow and Temperature Recommendations document, it is stated that the critical habitat for the endangered fish reside in Reaches 2 and 3. This is also stated in the EIS. Through modeling, Reclamation came to the determination that it was possible to reasonably predict future flows in Reach 2 with enough precision to efficiently augment these flows to achieve the target levels established in the 2000 Flow and Temperature Recommendations for Reach 2. The following statements are made in the 2000 Flow and

Temperature Recommendations which support using Reach 2 as the priority reach:

- ❖ Section 5.2.1 “Recommended flows for Reach 1... are those measured at the USGS gauge near Greendale, Utah, and are, for the most part, release patterns from Flaming Gorge Dam needed to achieve the target peak and base flows identified for habitats of the endangered fishes in Reaches 2 and 3.”
- ❖ Section 5.2.1 “Base flows in Reach 1 should be managed to ensure that within-year and within-day variability targets for Reach 2 are met.”
- ❖ Table 5.4 General Recommendations: “Peak flows in Reach 1 should be of the magnitude, timing, and duration to achieve recommended peak flows in Reaches 2 and 3.”

### **55j**

Comment noted.

### **55k**

Please see section 4.5.2 in the EIS which identifies the impacts.

### **55l**

It is difficult to isolate a specific number of years to evaluate the percentage of targets and durations achieved because it is unknown what the natural hydrograph will be in the future. Over the long run when several different natural hydrological years have occurred, Reclamation would be able to determine whether the percentages are consistent with the 2000 Flow and Temperature Recommendations. The target flows and durations to be achieved each year are dependent on the natural hydrograph of that year and the hydrological classification of that year. If 6 consecutive drought years occur in a row, like now, then only low targets and durations would

be achieved. In very wet years, high targets with long durations would be achieved.

**55m**

Comment noted. Reclamation intends to maintain an administrative record for how decisions are made that will be available to the public. Reclamation is considering use of a web page and other means to keep the public informed on implementation of the proposed action. The administrative record is portrayed in section 2.5.3 in the EIS and will be maintained if the Action Alternative is implemented.

**55n**

It is recognized that much of the supporting data regarding the Flaming Gorge Model did not appear in the draft EIS. The Hydrologic Modeling Team produced an initial report entitled “Flaming Gorge Environmental Impact Statement Hydrologic Modeling Study Report” issued in October 1, 2001. This report contains much of the information regarding how the Flaming Gorge Model was constructed. This report was added to the Technical Appendices.

The Flaming Gorge Model extends to the stream gauge at Jensen, Utah. It was assumed that if Reach 2 flows were met, Reach 3 flows would also be met. This is described in the October report.

**55o**

Please refer to section 2.3.2 in the EIS.

**55p**

Reclamation chose to measure distribution via a focus on those mechanisms exerting the greatest influence on establishment of invasive species. Consequentially, this led

Reclamation to focus as well on microhabitats or geomorphic features most associated with those mechanisms. The anticipated small difference between the No Action and Action Alternatives in total acreage of invasive species contributed to Reclamation’s decision to focus research on those issues that can best be addressed through adaptive management efforts.

**55q**

Statements made in this section reflect research discussed (and cited) for vegetation in chapter 3. For clarification, additional citations have been added to section 3.7.2.6.

**55r**

Information describing flow conditions on the three reaches of the Green River is available in section 3.3.3 of the EIS.

**55s**

This section of the EIS was written to disclose environmental consequences of the No Action and Action Alternatives affecting terrestrial and avian animals existing on or near Flaming Gorge Reservoir. Text has been added to section 4.7.1.4 to clarify and support the conclusion. Please refer to 46k above.

**55t**

The EIS analyzed the difference between the Action and No Action Alternative and did not find any adverse impacts that required mitigation. Under the Action Alternative, if there are concerns, they would be addressed through the adaptive management process described in section 4.20 of the EIS. Please refer also to section 4.21 of the EIS which lists environmental commitments.

**From:** "Park, Edward" <edward.park@IngramMicro.com>  
**To:** "fgeis@uc.usbr.gov" <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 10:34 AM  
**Subject:** Ed Park: Comment on Operation of Flaming Gorge Dam for Draft Environmental Statement

This message is for Mr. Peter Crookston, Flaming Gorge Environmental Impact Statement Manager:

Sir,

I was referred to you by some friends that were advised of the option to participate in submission of comments regarding the impact of flows in the Flaming Gorge/Green River area.

As someone that was recently impacted by the flow management practices, I decided to take a few moments to relate to you an incident that happened a few months ago as well as how that has convinced me of the importance of making my voice heard.

Back in September, a group consisting of myself and a few friends were fishing the gorge on a sandbar in the area. We had reached the sandbar by power boat and were wading in waist deep water.

Unknown to us, the dam started releasing a higher flow and we found ourselves in a situation where the water level was rapidly increasing. . . . we had to beat a hasty retreat into shallow water and then back into the boat. Needless to say, we felt it was not only inconvenient, but

**56a** downright dangerous as some of our party had quite a way to go to get back to the boat. By the time we retrieved the last of our party, the sandbar was already completely underwater.

**56b** My comment with regard to this is that while there is an importance with maintaining power generating optimization and water levels above the dam, specific regard to recreation and preservation of human life below the dam is important and any future planning and considerations should, in my opinion, include this.

Not to mention, we spent a considerable amount of time, effort, and money to make this special excursion and not even halfway through the trip, the water quality degraded enough to cancel all additional fishing throughout the remainder of the weekend. I guess the worst aspect about all of this was not the time, money, or driving to get there, but simply how difficult it is to get the "weekend" pass from all of our wives at the same time.

Thanks for lending an ear. I hope my input has been helpful

best regards

Ed Park  
AV, CA  
949 395 1964

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## **56. ED PARK**

### **56a**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **56b**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS. Please see response to individual letter 38 above.

**From:** "Lex Patterson" <lex@dakcs.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 4:30 PM  
**Subject:** Green River Flows

To Whom It May Concern:

57a

As an avid fly fisherman and Utah resident who spends time fishing the Blue Ribbon resource we enjoy in Utah, I would like to add my name to the list of taxpayers who would like to see the flows on the river stabilized during the daylight/fishing hours. I'm sure a win/win situation can be worked out that will allow for the power needs, and still keep this valuable resource fishing up to it's full potential. Thanks for taking the time to read my comments.

Lex Patterson

V.P. of Technical Services

<<http://www.dakcs.com/>> DAKCS Software Systems, Inc.

<mailto:lex@dakcs.com>

3017 Taylor Ave.

Ogden, UT 84403

(801)394-5791 x242

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Thank you.



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## **57. LEX PATTERSON**

### **57a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** Chet Preston <Chet.Preston@paccoast.com>  
**To:** "fgeis@uc.usbr.gov" <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 2:19 PM  
**Subject:** green river fishing

Mr. Peter Crookston,

58a I take 1 to 2 fishing trips a year to the green river and the last trip I took was the worst one yet the fishing was not very good at all it was ok in the morning but by the time the river come up to the peck the fishing stopped and got very slow . I stay at flaming George lodge and float with one of the guides so I spend the money to have a great time fishing that river but it's not wroth my time if I have to worry about the river going up and down and how it will affect the fish. In years past I have done very well fishing the river with at least 30 to 40 fish a day when I float with the guide but this past year I had to work hard just to get about 15 fish so if there is any way that we could get around this it would be great if not it's not worth my time or my money  
thanks for your time  
green river fisherman

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## **58. CHET PRESTON**

### **58a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Tom Prettyman" <prettyfoto@adelphia.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 5:15 PM  
**Subject:** Green River

Sirs,

- 59a** I hope you will understand that my input is intended to be constructive for the Flaming Gorge area. There have been flow fluctuations from the dam over the past several months that have resulted in a degradation of fishing success and generally turned a lot of fishermen off from visiting the area. I do not fully understand the reason for these fluctuations, but I do know that the end result must impact the local economy somewhat when fishermen don't return due to a disappointing experience. I would think there would be some way to compromise whatever electrical needs there are, with the recreational value to the community.
- 59b**
- 59c**

Thanks for your attention to this issue.

Tom Prettyman  
140 the Village #409  
Redondo Beach, CA. 90277

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## **59. TOM PRETTYMAN**

### **59a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative.

### **59b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

### **59c**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both

the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses.

However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information.

The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS. Please see response to individual letter 38 above.

**From:** "Jairo Ramirez" <jairoram@comcast.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 11:24 PM  
**Subject:** Green River Single Daily Peak Hump Restriction

Mr. Crookston,

- 60a** I want to voice my concern regarding the timing of the daily flow changes to the Green River below Flaming Gorge Reservoir. Increasing the flows during midday is both dangerous to wading fisherman and very disruptive to the fishing in general. Me and a group of guys routinely travel from Denver to the Green several times a year but have not been going recently because of this practice. I would encourage you to
- 60b** change the peak increases in flow from midday to during the night. If we can be assured that this practice will change to during the night, we will return to the green much more frequently.

Thanks for listening.

Jairo Ramirez  
jairoram@comcast.net  
Denver, CO

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## **60. JAIRO RAMIREZ**

### **60a**

The issue of daily fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

### **60b**

The changes in releases, as part of the operation of the powerplant, are designed

to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day.

**From:** "Robert Rutkowski" <rutkowski@terraworld.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Oct 11, 2004 9:49 AM  
**Subject:** Flaming Gorge Dam DEIS

Peter Crookston  
Bureau of Reclamation  
Provo Area Office  
302 East, 1860 South  
Provo, Utah 84606  
Phone: (801) 379-1152  
Fax: (801) 379-1159  
Email: fgeis@uc.usbr.gov

Ref: Flaming Gorge Dam DEIS Comments

Dear Mr. Crookston:

61a

I ask the Bureau of Reclamation to begin a comprehensive basin-wide approach to the recovery of the endangered fish of the Colorado River and its tributaries. The Bureau's piece-meal, one-dam-at-a-time approach to endangered fish recovery has yet to demonstrate any program success in the Colorado River basin. This approach must thoroughly evaluate how and if dams such as Flaming Gorge should continue to be operated.

Throughout the Colorado River basin, over 40 federal dams have reduced, or truncated, natural fish habitat to the meager miles set between large reservoirs. These altered habitats do not have the conditions necessary to fully recover the native fish from their endangered status. Such altered conditions include: reduced spawning beds, lower spawning temperatures, reduced water flows, reduced sediment and nutrient loads, and isolation from improving their genetic viability.

61b  
61c  
61d

I ask for a basin-wide, programmatic EIS that will truly restore the Colorado River ecosystem. I also ask that the congressional ban on studying the need to decommission Glen Canyon Dam be removed. Finally, I ask that alternatives for reservoir storage, such as recharging the depleted underground aquifers of the basin, be fully considered for study.

Yes, it is possible to restore the original connectivity of the Green, Colorado and San Juan rivers for the benefit of endangered fish and, at the same time, provide water for people.

Thank you for the opportunity to bring these remarks to your attention.

Mindful of the enormous responsibilities which stand before you, I am,

Yours sincerely,  
Robert E. Rutkowski

cc:  
Nancy Pelosi

2527 Faxon Court  
Topeka, Kansas 66605-2086  
P/F: 1 785 379-9671  
r\_e\_rutkowski@myrealbox.com



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**61. ROBERT E. RUTKOWSKI**

**61a –61d**

Comments noted.

**From:** Peter Sagara <morsaga@cybermesa.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 8:18 AM  
**Subject:** To put it bluntly...please change your tactics

Mr. Peter Crookston:

I fish the Green River below Flaming Gorge Dam and have been doing so for years. *During that time, I have been: with a friend who was caught across the river when the water was raised, unable to wade back until a guide in his boat stopped and brought him across; I have been there when the fish stopped rising even with the recent hatch of insects still on top....as the water rose up my waders and I had to make a hasty retreat to shore.*

Over the years I have been helping to support the economy of that area by staying at the Lodge, or at Red Canyon, and using guides and boats from Trout Creek Flies and of course, getting my Utah fishing license.

**62a** I support the single daily peak hump restriction but suggest that the timing could be managed so it has little or no impact on fishing activity.

Yours truly,

Peter Sagara  
58A Loma Blanca  
Santa Fe, NM 87506

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## **62. PETER SAGARA**

### **62a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Cris Shiffler" <cmshiff@nuskin.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 9:19 AM  
**Subject:** Draft EIS on the Operation of Flaming Gorge Dam

Mr. Crookston,

63a Good morning! I am writing to you this morning about a very important issue to both my wife Amanda and I that you are involved in. I have been made aware recently of a Draft Environmental Impact Statement on the Operation of Flaming Gorge Dam that you are in charge of. From my understanding of the Draft EIS, it would allow for daily fluctuating flows (once a day) from Flaming Gorge Dam into the Green River.

I am actually intimately familiar with this practice, as both my wife and I fish the Green River below the dam many times each year. This summer in particular, we have experienced these daily fluctuations almost every day we visited this year ( approx. 8 different times), and it was quite disturbing. It was disturbing to the fish, which seemed like they would "turn off" like a switch, to the dismay of many fishermen, some of which traveled a long way to experience this magnificent river. I have noticed that this problem happens with minor fluctuations in the river in years past, however this year seemed like quite large fluctuations occurred (from 800cfs-1500cfs or so) frequently throughout the week during the mid part of the day (around noon or so) which would ruin fishing for everyone on the river for the rest of the day. In addition to disturbing the fish, this practice disturbs not only myself, but many other fishermen (and women) as well. It is disturbing to notice that while you are wading in an already swift and large river, the water level begins to rise, sometimes rapidly in a short period of time. There were a few times this past summer where we noticed to our dismay that large sections of river were no longer accessible to us during the afternoon due to higher flows blocking wading access. Between lack of already limited access in some areas and disinterested fish, it can sure put a damper on a fishing trip.

We only travel from Provo to come up to Dutch John, but that still is a 3 hour one-way commitment. We spend a pretty decent amount of time in Dutch John, and a pretty decent amount of money each year supporting the few local businesses. I would suspect that 99% of all fishermen on the Green River below Flaming Gorge Dam are not from Dutch John. These same fishermen are also pretty particular about their fishing locales. Remember back to just a few years ago after the Mustang Ridge fire. Dripping Springs got blown out after those rainstorms and all of that debris got washed into the river. Sure, it affected fishing temporarily, but not that much. Word got out about the fire and the debris and people stopped coming to the river for quite some time because the "word" was that the river was ruined. That definitely was not the case, but many of the local businesses suffered. If these large daily flow fluctuations are allowed to continue, I believe that fishing pressure, and the tourism dollars, will begin to dissipate. Why would someone want to travel all that way to Dutch John only to be able to have a few hours of productive fishing in the morning hours. The flow increases and decreases will render the remainder of the day pointless for fishing.

I believe that power production and recreation can coincide harmoniously if some careful preplanning is done. My wife and I support

- 63b the single daily peak hump restriction, but its timing should be in a manner that it has no impacts on river recreation activities, especially fishing. The ideal situation for all recreationalists using the Green River below Flaming Gorge Dam, not just fishermen, would be to time these flow fluctuations to time periods that are not peak river use hours. Late evening or even during the night would be a phenomenal compromise. No one is on the river at that time (or very few people anyhow). It would allow the fish and other river aquatic life time to adjust to their changing habitat, while not receiving additional stress and pressure from fishermen. In addition, from my understanding of the authorized purposes of Flaming Gorge Dam, recreation and the inhabitants of the river (fish, insects, etc.) have priority over power generation. I believe that over the last few years, power generation has seemed to take priority over everything. I believe that this tiny area of the state brings in some serious tourism and recreation dollars not only for the Dutch John area, but for the state of Utah in general.
- 63c
- 63d

We urge you to consider all of the options the Bureau of Reclamation has available during this Draft EIS period. We hope that a serious review of what is right for the river will be taken and that a compromise can be worked out that benefits everyone involved, not just for power generation. I would welcome the opportunity to discuss this issue and my views more with you if you would care to. Good luck and I appreciate you time for reading this!

Best regards,

Cris & Amanda Shiffler  
Provo, UT  
801-345-2709

CC: <dbreer@union-tel.com>

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**63. CRIS AND AMANDA SHIFFLER****63a and 63b**

The issues of fluctuations for power and the single daily peak hump restriction are outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**63c**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the

ramping rates have been scaled back to limit the changes in releases throughout the day.

**63d**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

**From:** <Snwrngr@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 11:00 AM  
**Subject:** Green River below the Dam

Mr. Peter Crookston,

Just wanted you to know ...

64a I use to come to the river (below the dam) to fish. I do live in the Denver area and it is a little bit of a drive for me, but usually well worth it. I did experience a high flow increase in the middle of the day, each day, on my last 4 day visit. It really made the fishing bad ... especially in the evenings when the flow came back down.

I now take my vacation money and fish in Wyoming. It's not as pretty but the fishing is consistent. If you could manage your flows better I may come back.

Thank you for your time,

Jay Smith  
Denver, CO 303-478-0345

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## **64. JAY SMITH**

### **64a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.



**FGEIS ZZ401 PRO - Green river fluctuation**

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**From:** "les smith" <l683971@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** 11/13/2004 10:02 AM  
**Subject:** Green river fluctuation

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**Mr Peter Crookston**  
**Flaming Gorge Environmental Impact Statement Manager**  
**PRO-774**  
**Bureau of Reclamation, Provo Area Office**

I have fished these waters for the last 20 years and have dealt with the fluctuation. It has been something I have excepted.

**65a** If the time could be moved to the night time Hrs. it would make my quality time a lot better. I live in Ft. Collins, Co. but I consider the Green home. I usually spend \$100 a day any time I come to the river. Of course this is spread around to the different businesses. I feel I am the average person so this could be higher or lower.

Thank you for listening.

Les Smith

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## **65. LES SMITH**

### **65a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

**From:** "Kent Spittler" <kspittler@ksl.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 11:08 AM  
**Subject:** Green River flow fluctuations

Dear Mr. Crookston,

I am writing to you because I believe there are mutually agreeable solutions to the power generation requirements you have to weigh, and the disruption of the quality fishing experience that the Green has become famous for due to the dramatic flow changes. First of all, recreation takes priority over power generation according to the Flaming Gorge use authorization statements and second, power generation and great fishing can both happen if some common sense is applied. When the flows dramatically change, up or down, it puts the fishing down for hours at a time plus it poses a serious risk of life to those who wade fish the river when the inflow doubles in the middle of the day. I would suggest that the timing of the flow changes be altered to non fishing periods (night time) so that the power can be generated and the fishing can recover by the time anglers get on the water. I visit the Green both for personal days on the river and I often times bring *clients of mine*, (I am an account manager for KSL Radio), and we spend money on lodging, food, licenses, flies, etc. The last thing I want to experience on those days is a four to six hour flat spot in the afternoon when some of the best fishing can be had. This doesn't have to happen. I'm sure there are issues on both sides to consider but I'm also sure that good solutions exist so that both needs can be realized. Please don't discount the effect that fishing has on the local economy and quality of life in general for those of us who love the Green.

Thanks!

Kent

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## **66. KENT SPITTLER**

### **66a**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

### **66b**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **66c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river

warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **66d**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 above.

**From:** "Wayne Stewart" <wstewart@csolutions.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 8:39 PM  
**Subject:** Green River flow fluctuations

Mr. Crookston,

**67a** I am a Utah resident and fly fisherman. I've been fishing the river for about 13 years now and would like to request that you make a change in the fluctuations in the future. I wade and float the river when I fish. This last year I noticed that the consistency of my fishing experience has changed. I've noticed it in previous years as well but only became aware of the reason this last year. When water flow is changed the fishing is disrupted as the fish adjust to the new flow. This often happened in the middle of the day. I would like to request that these flows be changed

**67b** during non-fishing hours, after dark and enough before daylight that it won't effect the fishing experience. I've spoken with a couple of people who've done some research and understand that the change I'm requesting is not only possible, it is appropriate. I have friends and family members from Colorado, Ohio, Michigan, New York and California who come to Utah to fish a couple of times a year and one of our favorite spots is the Green River. They spend a lot of money when they visit and some mentioned their disappointment wit the river this year. One group, my college buddies, have scheduled a trip to Idaho next summer instead of the Green. Please adjust the flow schedule to accommodate the fisherman and other recreational users.

Sincerely,

Wayne Stewart

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## **67. WAYNE STEWART**

### **67a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **67b**

The changes in releases, as part of the operation of the powerplant, are designed

to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 above.

**From:** Strong <strong@easilink.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 7:47 PM  
**Subject:** Flaming Gorge EIS

**68a** Dear Sirs, as a Vernal city/Uintah County resident I wish to register my support for the action alternative to release surplus water during high runoff years from the Flaming Gorge dam. I believe the overall positive impacts from the increased flows are more than worth the various other negative impacts from the proposed releases.

Thank you

Steven Strong  
Vernal, Utah

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**68. STEVEN STRONG**

**68a**

Comment noted.



**From:** Jeff Talus <JTalus@skrco.com>  
**To:** "fgeis@uc.usbr.gov" <fgeis@uc.usbr.gov>  
**Date:** Mon, Nov 15, 2004 1:06 PM  
**Subject:** Green River Flows

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774

69a I support the single daily peak hump restriction, but its timing should be in a manner so that it has no impacts on river recreation activities, especially fishing and floating. Notwithstanding the negative impact to fishing and floating the daily flow changes had last summer, there is the issue of safety, to which I will provide the following personal experience.

69b During the weekend including 6/27/2004 I was part of a group camping on the B section below Flaming Gorge Dam. We left the campsite Sunday the 27th shortly after noon heading for Indian Crossing with the intension of returning home to Colorado Springs. I was rowing my drift boat and a friend was rowing his raft. Since a drift boat had more room than a raft, most of the gear was loaded into my drift boat for the trip down river. At Red Creek rapids, my passenger exited the boat to make the usually walk down the rapids while I rowed through. Unfortunately, as a result of the low flow, heavily loaded boat, and a rowing error on my part my boat ended up stuck on Dragons Thumb rock in Red Creek rapids. The boat was resting on its side on the upstream side of the rock with about 1/3 of the boat underwater. We tried to free it with the ropes we had but the current was too much so we left for Dutch John with the intension of returning later that day with more ropes and/or gear. When we returned later that day we found that the boat was now almost completely covered by the increased flow and pulling it off the rock was no longer an option during the increase flow. We were forced to stay overnight waiting for the flow to subside before we were able to free the boat the next day. Unfortunately, we were unprepared for another night of camping since some of our camping gear had floated down river after the earlier stranding. And it was a very cold and rainy night, probably in the low 40's. Luckily everyone survived the ordeal but it certainly could have ended differently.

69c Therefore, I believe the daily peak hump should be set in a manner so that it has no impact on river recreational activities, especially fishing and floating, and so that it does not endanger river users during recreation nor have a negative impact on the fish, which I understand are suppose to have a priority over power generation under the authorized purposes of the Flaming Gorge dam.

Sincerely

Jeffrey W. Talus, CPA

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## **69. JEFFREY W. TALUS**

### **69a**

The single daily peak hump restriction is outside the scope of the EIS; such operational details would continue under any alternative.

### **69b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **69c**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS. Please see response to individual letter 38 above.

**From:** "john & carson taylor" <owlck35@infionline.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 1:51 PM  
**Subject:** comments of John I. Taylor on Flaming Gorge Draft

I thank you for the opportunity to comment on the DEIS for the reoperation of the Flaming Gorge Dam. This comment is submitted from the perspective of a private recreational user (whitewater boating and fishing) of the waters below the dam.

70a I strongly support the action alternative as this will create a more *natural river hydrograph*, one that may make it possible for the recovery of the listed endangered fish. I also support any modifications to the DEIS which would even more closely mimic the natural hydrograph of the Green River that existed prior to the building of the Flaming Gorge Dam. It seems to me that the recovery of the listed species is only possible if we restore to the extent possible the natural hydrograph.

Nor will such an operation of the dam adversely impact the opportunity for whitewater boating. I have had the good fortune to run the Yampa at high flood in May of 1983 (c. 20,000 CFS) and the Gates of Ladore during Fall base flows (c. 800 CFS). Both trips are wonderful, offering different but great recreational experiences. This would not change under the action alternative even if modified to more accurately mimic a pre-dam river.

The same is true for the tail waters fisheries below the dam. Rolling high water is never great for fishing whereas lower base flows are conducive to good fishing. Nothing would change under the action alternative, even if further modified.

In conclusion, this is about more than the survival of the listed species. Rather, the recovery of the listed species will indicate that the riparian and riverine ecosystems are functioning as they did before the dam. It is only under such conditions that the listed species can recover.

Thank you,

John

I. Taylor

**CC:** <csmith@amrivers.org>, <bmillier@westernresources.org>

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## **70. JOHN I. TAYLOR**

**70a**

Comment noted.

**From:** Jim & Linda Thompson <lthompson28@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Oct 31, 2004 12:19 PM  
**Subject:** Comments on Operation of Flaming Gorge Dam DEIS

Dear Mr. Crookston,

My purpose in writing is to submit a few comments concerning the recently released DEIS of the "Operation of Flaming Gorge Dam". Please consider the following:

As always, I've been a strong supporter of doing whatever we can to assist wildlife, especially those that are endangered, threatened, or sensitive. I realize there are many demands from many different factions on the dam and reservoir. However, what really ought to come first, are the needs of the native fish and wildlife species that once thrived in the area before the dam's construction. True, it's great that there have been attempts to mitigate or ameliorate some of the negative impacts of the dam and its fluctuating river flows down stream, and that we still are trying. But it seems like a futile battle, in that the endangered populations are still declining--mainly due to the dam's impacts. So, yes, I guess I can support the Proposed Action Alternative, but I'm not convinced anything will really do the job short of decommissioning the dam. So good luck!! I hope something will work--and maybe the proposed action will. Thank you for your attention. Sincerely, James W. Thompson, 3801 Viking Road, Salt Lake City, Utah, 84109, home ph: (801) 272-3683

71a

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## **71. JAMES W. THOMPSON**

**71a**

Comment noted.

**From:** <PhilH2O@aol.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 4:55 PM  
**Subject:** Flaming Gorge Environmental Impact Statement

Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317

Dear Mr. Crookston,

72a I write to express my concern that flow management below the Flaming Gorge Dam may not be implemented to the best interests of recreationists, particularly fishermen. If, in fact, power generation can be managed while also coordinating flows that do not negatively impact fish, feeding patterns and the ability to safely navigate the river as well as wade its banks then please see that future policies express this desire.

72b The Green River below Flaming Gorge is an important and desired destination for sportsmen. Should the quality of the fishery be negatively impacted then our fear is that it most definitely will negatively impact the economics of the surrounding area including the hamlet of Dutch John.

Sincerely,

Phil Waters  
7322 Brook Trout Trail  
Evergreen, CO 80439

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## **72. PHIL WATERS**

### **72a**

The issue of fluctuations for power is outside the scope of this EIS; such operational details would continue under any alternative. Please see response to individual letter 38 above.

### **72b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.



**From:** "bryanhwe" <bryanhwe@msn.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sun, Nov 14, 2004 12:03 PM  
**Subject:** Green River Flows

- 73a I have experienced the high and low flow rates several time this summer and must express my distaste for this practice. Not only do I feel it is an unsafe thing to do to wade fishermen, it has spoiled my entire day
- 73b fishing and puts me off on going to the green if this is going to continue. When I have limited time too spend fishing I want it to be worthwhile and therefore will go to waters (in Idaho) that do not do this up and down thing if this continues. I feel that my option and that of others that I know feel the same why should be seriously considered as not to adversely affect the generation of money spent in the Green River recreation area lost to other states. Lets even out the flows and have the best of both worlds, a win win
- 73c situation can be made here.

Bryan Weight

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### **73. BRYAN WEIGHT**

#### **73a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

#### **73b**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed, and so the fluctuations are common knowledge among those who have visited the river in

the past. Nevertheless, Reclamation continues as part of its management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

#### **73c**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 above.

**From:** "Hallie Serazin/Jim Wilson" <robinsnest@midohio.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Sat, Nov 13, 2004 7:37 PM  
**Subject:** single peak flow management

TO:  
Mr Peter Crookston  
Flaming Gorge Environmental Impact Statement Manager  
PRO-774  
Bureau of Reclamation, Provo Area Office  
302 East 1860 South  
Provo, UT. 84606-7317

Greetings Mr. Crookston,  
I write from Ohio. Other than the Lake Erie walleye fishery, which is under significant pressures, there is little to be proud of or get excited about in comparison to the magnificent Green River trout fishery. However, there is building momentum in our part of the country to take practical, doable steps to improve natural stream flow and habitat by doing such things as removing unnecessary low head dams on many of our river systems, and incentivizing conservation practices such as grassed filter strips along tributaries located on agricultural use land.

So why do I take the time to correspond from Ohio on the issue of flow management at *Flaming Gorge*? I have been dreaming of the times soon to come when I will take my family and our young teen age son to get to know the special places in the American west. Fishing is sure to be a big part of that experience. Flaming Gorge and the Green River are sure to be a target destination. When we arrive will we find the best fishery possible?

**74a** Or, will management practices respond to some other set of priorities at the expense of the fishery?

**74b** I encourage the Bureau to remain committed and responsive to the order of priority in the responsibilities with which it is charged. Please do all that is within your authority to operate Flaming Gorge in a manner that recognizes the specialness of the Green River fishery.

Warmest regards,

Jim Wilson  
Delaware, Ohio

**CC:** "Denny Breer - Fish Green River" <dbreer@union-tel.com>

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## **74. JIM WILSON**

### **74a**

The EIS states Reclamation's intent to balance the needs of all resources when making operational decisions under both the Action and No Action Alternatives. We appreciate your concern that power generation might have benefited at the expense of fishing and other uses. However, the analysis of the cumulative effects on hydropower generation shows that power has not been elevated above other authorized purposes and that, in fact, there have been losses to hydropower over the last 20 years. Please

see section 1.4.2 for more information. The proposed action will not have a negative effect on the sport fishery, as shown in chapter 4 in the EIS.

### **74b**

As stated in section 1.5 of the EIS, Reclamation's priorities are first, dam safety and then second, meeting project purposes in compliance with ESA.

Long-term negative effects to the tailwater trout fishery are not expected under the Action Alternative. Please see response to individual letter 38 above.

**From:** "Marshall Wilson" <mswilson33@earthlink.net>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** Fri, Nov 12, 2004 7:13 PM  
**Subject:** Flaming Gorge EIS

Dear Mr. Peter Crookston,

**75a** I am writing to express my concerns over the continued efforts to fluctuate flows from the Flaming Gorge Dam and hope that you will consider my comments in your decision on the Impact Statement. I have been making on average 3 trips a year to the Dutch John area and contributing to the economy of that area for over a decade now. Two fo these trips ususally fell in the late Spring and Summer. Seeing as I own my own drift boat, I usually bring 2 or more friends with me each time I visit.

**75b** I can honestly say that if you continue to advocate and fluctuate flows like you have this past year that I will no longer be making these trips to the Green. The fishing will be better elsewhere. And why would I want to purchase an out of state fishing license, a Parking Pass! and fishing supplies if the fishing will be nothing short of terrible? I'm sure *the economy had to have suffered*. I am a professional in the Travel and Leisure industry and I, like you, understand the importance of revenue streams in the economy. You can bet that the status quo will have an impact the you can quantify early.

**75c** I hope you will consider generating power at a higher, steady flow. Can you not produce the same amount of electricity either way? I would think this would be a great compromise.

All the Best,

Marshall Wilson  
P.O. Box 3770  
Copper Mountain, CO 80443-3770

**CC:** <dbreer@union-tel.com>

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## **75. MARSHALL WILSON**

### **75a**

The issue of daily fluctuations is outside the scope of this EIS; such operational details would continue under any alternative.

### **75b**

Implementing the Action Alternative is expected to have an overall positive effect to the three-county area near Flaming Gorge Dam. Please see response to Town of Manila, Utah, 3a.

### **75c**

The changes in releases, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Increasing the releases at night or having a constant release during the day would not help meet the peak demands for electricity. However, in more recent years, the ramping rates have been scaled back to limit the changes in releases throughout the day. Please see response to individual letter 38 above.

**FGEIS ZZ401 PRO**

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**From:** "Crista Worthy" <crisaworthy@hotmail.com>  
**To:** <fgeis@uc.usbr.gov>  
**Date:** 10/12/2004 10:41 PM

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The health of the Colorado River is of great concern to me. I frequently fly to Utah or Arizona for backcountry hiking, and over the years have seen the area change for the worse.

**76a** The dams, as you know, have completely changed the character of the river. Mitigation below Glen Canyon Dam has not worked. Instead of looking at each section separately, we need a comprehensive, basin-wide approach to the recovery of the fish living in the Colorado and its tributaries.

The congressional ban on studying the decommissioning of the Glen Canyon Dam should certainly be removed! I have spent an enormous amount of time in this area. The side canyons are recovering now that the water is low. Plants, animals and birds are quickly returning.

**76b** We should study the replenishing of underground aquifers for water storage, instead of the reservoir, which loses so much water each year to evaporation. 30,000 dump truck's worth of silt flows into Lake Powell each day. It should be going into the Grand Canyon. Eventually the Glen Canyon Dam will be useless anyway.

I hope to hear what decisions you make.

Sincerely,  
Crista Worthy  
16664 Calle Brittany  
Pacific Palisades, CA 90272  
(310)560-7324

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## **76. CRISTA WORTHY**

### **76a and 76b**

Both of the commenter's concerns are outside of the scope of the EIS.



# **PUBLIC HEARINGS**

**Moab, Utah – October 12, 2004**

- 1. John Weisheit, Living Rivers**

**Salt Lake City, Utah – October 13, 2004**

- 2. Enos Bennion**
- 3. Leslie James, CREDA**

**Rock Springs, Wyoming – October 19, 2004**

- 4. Janet Hartford, Chamber of Commerce of Green River, Wyoming**

**Dutch John, Utah – October 20, 2004**

- 5. Chad L. Reed, Daggett County Commissioner**
- 6. Deloy Adams, Flaming Gorge Lodge**
- 7. Dennis Breer**
- 8. Jerry Taylor, Lucerne Valley Marina**

**Vernal, Utah – October 21, 2004**

- 9. Steven Romney, Uintah Mosquito Abatement District**
- 10. Edmond Wick**
- 11. Melissa Trammell, National Park Service**

PUBLIC HEARING  
HELD: OCTOBER 12, 2004, 6:00 P.M.  
AT: RAMADA INN  
182 SOUTH MAIN STREET  
MOAB, UTAH

**John Weisheit**

My name is John Weisheit. I represent Living Rivers. I'm the conservation director. I also represent Colorado Riverkeeper. I'm the program director. The Riverkeepers Alliance—Waterkeeper Alliance, who sponsors my designation in Colorado Riverkeeper, and I also represent 50 groups. I believe those groups are listed in our scoping comments that supported our letter, scoping letter that we wrote back in July of 2000. And I also represent Colorado Plateau River Guides, because they were one of the sign-ons for the letter, and there are about 15 -- well, almost everybody here is a member of Colorado Plateau River Guides.

If I have more time, please let me know.

1a First of all, we do not think that the flows are high enough in Reach One to reduce the encroachment of vegetation which promotes channel narrowing and changes the natural morphology of the river, which is essential for spawning and nursery habitat.

1b We are also not fully convinced that the Bureau will successfully time the high water releases at the most advantageous time for the native fish. We think it is highly possible that the Bureau could inadvertently flush larval fish downstream into inappropriate nursery habitats downstream that would bring diminished recruitment and native fish mortalities.

1c We also think the Bureau should produce higher flows into Reach One to store sediment on the margins of Lodor Canyon and Dinosaur National Monument, with such subsequent improvements to the riparian habitat such as the recruitment of cottonwood trees, which are greatly diminished in this particular National Monument.

1d Most importantly, we believe that the Bureau should take a leadership role in providing a fish ladder at the Tusher Wash Diversion Dam near Green River, Utah. This would also include a device that would stop the incidental take of endangered fish that occurs as they migrate into man-made canals and waters that flow into powerhouse at this Green River.

1e The Colorado River system is under considerable stress at the present time due to the effects of climate change or extended drought. We feel that the proposed flow and temperature regime could be jeopardized by the circumstances of the changing global climate. We have concerns about a complete draw down at Flaming Gorge Reservoir should there be a compact call by the lower basin states. We are also concerned about lower water quality from the reservoir as it is returned to the river bed below the dam during such an emergency situation. We therefore ask that the issue of climate change be addressed in the final EIS.

1f We are also disappointed that a survey—sediment survey was not done for the following reservoirs: Fontenelle, Flaming Gorge on the Green River and the Taylor Draw on the White River. To our knowledge, no sediment study has ever been formally

completed on any of these reservoirs. We feel that it is not only essential, but it is also the responsibility to monitor the rate of reservoir sedimentation so that the Bureau can effectively manage the dam and reservoir for the purposes and needs for which it was built, and for the safety of the general public.

This is my big picture testimony.

We are not convinced that the Bureau of Reclamation is providing the necessary leadership that is truly required to improve the critical habitat of the Colorado River Basin for the benefit of the endangered fish species. Nor for that matter, the benefit of human beings.

In 1979 the General Accounting Office reported that unless substantial management changes were completed by the year 2000, the Colorado River plumbing system would fail the needs of both the environment and for human consumption. Their caution has since become a promise fulfilled.

1g The Bureau must stop this piecemeal, one-dam-at-a-time approach to Colorado River management. We need solutions to our problems throughout the basin and not the standard maintenance of the status quo. A basin-wide programmatic EIS must begin as soon as possible for the entire Colorado River Basin.

This programmatic EIS must be willing to accept all alternatives, especially those which are politically uncomfortable and unpalatable, such as dam decommissioning. We need to get rid of some of the infrastructure immediately to bring about better water efficiency for both human needs and for the endangered fish.

1h That alternative is the recharging of the depleted aquifers throughout the Colorado River Basin.

These aquifers can hold more water than the 62 million acre-feet of storage the Bureau has constructed since the 1902. These aquifers were already dangerously—are already dangerously depleted and need to be refilled before they close or subside more than they already have. By recharging our underground storage sites near cities and farms, we have no more reason to depend on wasteful reservoirs that evaporate precious water, reduce the water of—quality of the water, particularly the reduction of salt, nor do we have to worry about the consequences of dam failure.

I just wanted to say that we will be writing some more significant comments. I still have yet to read the entire document. I have comments in support to look at the biological opinion, which I haven't been able to find.

I also need to interview U.S. Fish and Wildlife and biologists and get more information, so I just wanted to let you know that thanks for having—letting us have another six days. I might need it. And so I look forward to learning more about what some of the other people are saying about this and promise to include them in future letters in the form of our final—our letter for the final EIS.

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## **1. JOHN WEISHEIT, LIVING RIVERS**

### **1a**

Comment noted.

### **1b**

Reclamation will develop an annual operational plan with substantial input from the Technical Working Group. Decisions regarding the timing, duration, and magnitude of peak flows within a given year under the Action Alternative would be made using the criteria listed in table 2-5 of the EIS. Additional input from the Flaming Gorge Working Group would also be considered in planning operations. This allows opportunities to refine flow attributes based on an adaptive management process.

Also, the Recovery Program has monitored and likely will continue to closely monitor timing of endangered fish larval drift for the purposes of contributing to the flow planning process. Studies occurred in May-June 2005 to monitor dynamics of larval drift and entrainment over a range of flow elevations. The 2000 Flow and Temperature Recommendations recommend use of such real-time information gathered by the Recovery Program in determining the specific magnitude, duration, and timing of flows within any given year; and the EIS further recognizes the role(s) of continued research and monitoring in refinement of flow recommendations through an adaptive management process.

### **1c**

The commenter speaks to establishing cottonwood in the national monument, part of which is in Reach 2. For example, the cottonwood forest in Island Park was studied in conjunction with hydraulic modeling of flows of the Green River completed by the National Park Service in 2001. Channel aggradation was noted for that portion of the Green River. It was also noted that growth of vegetation in the channel would increase the rate of sediment deposition locally in this area (*Two Dimensional Computer Modeling of the Green River at Dinosaur National Monument and Canyonlands National Park*, Gessler and Moser, July 2001).

### **1d**

A decision as to the necessity and feasibility of a fish passage at Tusher Wash Diversion is a responsibility of the Recovery Program and is outside the scope of the Flaming Gorge EIS.

### **1e**

Reclamation did not attempt to project specific climate changes into the future as these projections are considered speculative and difficult to quantify from a hydrologic standpoint. If climate change does occur, it will impact the inflow statistics and the hydrological year classification that will be used for making decisions about how to operate in a given year.

### **1f-1h**

The commenter's concerns are outside of the stated scope of the EIS.

PUBLIC HEARING  
HELD: OCTOBER 13, 2004, 6:00 P.M.  
AT: MARRIOTT HOTEL  
75 SOUTH WEST TEMPLE  
SALT LAKE CITY, UTAH

**Enos Bennion**

I came unprepared tonight. I was looking to have an opportunity to review this draft copy. And my only comment on this is I've had a hard time finding this document. I really think that you could do a better job advertising some way so that the public would have an opportunity to review this before this type of meeting. I don't know how we do that. I'm sure if I was not so ignorant, I would know what office I could go to, because you did mention you had sent a number of these things out. And they were available to the public.

I attended a meeting that was held in Vernal several years ago, and it was a discussion of the operations of Flaming Gorge itself, the water flow, fish management, recreational management and the whole schmear, and it was a public meeting, and maybe some of you people were in attendance at that meeting. But I got—I signed up for feedback on the information that was presented that night, and I did not receive it. So I know this is rather negative, but this has been my concern.

And I really can't comment on this tonight because I haven't had an opportunity to review it. But I would like to say that I have a concern over the total operation of the Flaming Gorge recreational area and the downstream area. From the standpoint that the objectives of the project itself, which started out early on as a flood control, a recreational area and power, economic power to pay for the project.

Later on, I guess, in the—after the completion of the dam, we got into the—the—you know, the law that cranked in protection of the fish and so forth, and since then I figure that—from what I can find out, that that's the primary reason for the dam at this point, number one priority, rather than the power or the recreational area that is often at the Flaming Gorge facility.

And I think it's a little out of balance. And that's probably because I haven't had an opportunity to see what kind of progress we've made here. I know that two or three years ago, of the four fish that were identified here, it was reported that one of them was basically extinct, and we hadn't had very much success in—in, you know, recovering the fish.

I can probably read this and find out how that progress is coming. Are we enhancing the environment for the fish by what we're doing? And I hope this will answer that. Or are we trying to do something else now to enhance it further?

2a

In my simple way of thinking, it would seem to me like the best way to duplicate the environment that these fish should see when they were flourishing would be to fill the dam all the way up and let the high water take care of the overflow and just basically create an environment that was there before the dam was there to start with.

I can't see what is the matter with that plan or why it would be any different than the way it was before the dam was in place. We'd have high water in the springtime

when the dam was overflowing and it would be a natural way of providing the environment that these fish once had.

And that's about all I have to say, but I—I do appreciate getting this information. And I plan on making some comment once I have an opportunity.

### **Leslie James**

My name is Leslie James, representing the Colorado River Energy Distributors Association, CREDA. Our—my address is 4625 South Wendler Drive, Suite 111, Tempe, Arizona, 85282.

I'd just like to make a few remarks and we will submit some written comments within the time period.

CREDA is an organization, nonprofit, that represents the majority of the CRSP, our customers in the six western states. Our members serve about three million citizens in these six states.

I'd like to just point—make a couple of general statements. We fully appreciate the efforts that Reclamation has undertaken in developing this draft EIS. We recognize the difficulty is to balance all of the comments and all of the interested party information.

3a

I'd like to point out two things, though. The Colorado River Basin Project Act expressly provides in it that nothing shall amend or modify the compacts, the treaty with Mexico or the Colorado River Storage Project.

And I make that comment with regard to the purpose and need section of the draft EIS.

3b

A second general comment. Endangered fish recovery efforts are the express purview of the Endangered Fish Recovery Implementation Program, and to impose a standard other than to avoid jeopardy in our view is inconsistent with NEPA and the ESA.

We will submit, as I said, some detailed comments on some of the following areas of the draft EIS: the cumulative impact section, the hydropower section, environmental consequences with regard to the spillway use, financial analysis results. And we will also recommend that cash flow analysis also be incorporated into this draft EIS, particularly with regard to the current basin fund situation related to the drought conditions. And also flow recommendations and flooding section.

3c

We are a participant in the Upper Basin Endangered Fish Recovery Program, and working through our biologist in that program, who was very involved in developing the full recommendations, it's our opinion that the intent of those recommendations is to obtain an average of flows and not to meet specific flows.

3d

These are recommendations, they are not mandates. And we also understand that there is significant new scientific information which has been discussed by the biology committee of that program as late as August that information should be incorporated into this draft EIS.

Thank you for the time.

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## **2. ENOS BENNION**

### **2a**

The commenter's suggestion is a run of the river alternative. Please refer to section 2.2 of the EIS for related information.

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## **3. LESLIE JAMES, CREDA**

### **3a**

The purpose and need is consistent with all applicable Federal laws, and Reclamation agrees that nothing in the CRBPA amends or modifies the compact or international treaty with Mexico.

### **3b**

Development of water resources was highlighted in the EIS narrative to illustrate the close connection between this authorized project purpose, the proposed action, and the Recovery Program. Avoiding jeopardy to listed species and assisting in their recovery is consistent with both statute and the agreements of the Recovery Program.

### **3c**

The intent of the proposed action (Action Alternative) is to achieve the 2000 Flow and Temperature Recommendations while maintaining and continuing all authorized purposes of the dam. Both the 2000 Flow and Temperature Recommendations and the EIS describe spring peak flows as "greater-than-or-equal-to" a given flow, indicating a minimum peak flow, not an average.

### **3d**

The EIS was prepared using the best available information, and updates were included where appropriate in preparing the final EIS. The EIS acknowledges the flexibilities and uncertainties of implementing the 2000 Flow and Temperature Recommendations, and adaptive management will be used to address uncertainties as explained in the EIS.

PUBLIC HEARING  
HELD: OCTOBER 19, 2004, 6:00 P.M.  
AT: HOLIDAY INN  
1675 SUNSET DRIVE  
ROCK SPRINGS, WYOMING

**Janet Hartford**

I'm Janet Hartford. I'm the director for the Chamber of Commerce of Green River, Wyoming, located at 541 East Flaming Gorge Way in Green River, Wyoming, 82935.

At the September Board of Directors meeting I brought up and passed out a copy of a basic statement about the EIS and your folks asking for comments. The Board of Directors unanimously voted for me to write a letter to you—and so I will read that letter to you—in regards to your EIS, and their unanimous action or support is to take no action. So I will read that letter and then I will give it to you.

“Dear Mr. Crookston,

“I am writing you in regard to the EIS that will affect the Flaming Gorge Dam and the proposed flow regulations. The Green River Chamber of Commerce would like to strongly express its recommendation and support to the NO ACTION plan. The Chamber feels that any change in flow would dramatically affect several aspects of the Flaming Gorge area.

4a “Sweetwater County looks upon Flaming Gorge Lake as a great tourist attraction that funnels over 90,000 tourists (sic) to the area a year. That translates into dollars that are spent not only at marinas but also at the service industries, in other words, the gas stations, sporting goods stores, grocery stores, restaurants, hotels. We also rely on the lake as a recreation for our local residents. Our youth, as well as the rest of the Sweetwater County community, spend many days of the summer at the lake.

4b “The lower level would be detrimental to the economy as well as our way of life. Sometimes change is good, but in this case, we do not feel this kind of change is beneficial. There is no guarantee that by changing the flows, the endangered fish in question will prosper, but it is a guarantee that game fish, recreation, quality of life and the economy will become endangered.

“Thank you for the opportunity to express our opinion.”

And it's signed by myself and it is in support from the Board of Directors.  
Thank you.



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**4. JANET HARTFORD,  
CHAMBER OF COMMERCE OF  
GREEN RIVER, WYOMING**

**4a**

Comment noted.

**4b**

There are no requirements of the 2000 Flow and Temperature Recommendations or the 1992 Biological Opinion

which specify particular reservoir elevations. Reservoir elevations are a product of dam safety and water storage. The EIS shows that the reservoir elevation would be more stable under the Action Alternative. See figure 4-1 in the EIS for a comparison between alternatives of the mean monthly reservoir elevation.

PUBLIC HEARING  
HELD: OCTOBER 20, 2004, 6:00 P.M.  
AT: DUTCH JOHN CONFERENCE CENTER  
SOUTH BOULEVARD  
DUTCH JOHN, UTAH

**Chad L. Reed**

I am Chad L. Reed, representing Daggett County as a county commissioner. We will be submitting written comment, but we wanted the opportunity to make verbal comment at this time.

In reviewing the EIS and in participating in past meetings dealing with the flows of Flaming Gorge Dam, we are somewhat pleased with some of the outcome of what is at least in the proposed EIS, but we would like to refer to at the inception of the Flaming Gorge Dam, there was assurances that were given to the county commissioners at that time that the process was of a national recreation area being developed, and those areas of recreation, management and utilization of the natural resources and the promotion of the area would not negatively affect the overall economic development of Daggett County.

And to refer to page S-4 of the Executive Summary, it gives some statements referring to the National Recreation Area Act of 1968 that gives some three specific reasons or purposes that a creation of Flaming Gorge Recreation Area and the Flaming Gorge Dam.

I'm going to comment on more than three but they state that the purposes for the area was to—and the development was for the public—public outdoor recreation benefits, conservation of scenic, scientific, historic and other values contributing to enjoyment and such management, utilization and disposal of natural resources that would promote or are capable—compatible with and do not significantly impair the purposes for which the recreation area was established.

Furthermore, there has been other information provided through—information has been given to the public and through the creation of the legislation of Flaming Gorge Dam that one of its sole purposes was for the creation of hydroelectric power.

5a

With these statements that we've made, it's of grave concern to the county officials of Daggett County that all economic impacts of this state would be protected in the future dealing with the study that has been done for the stability of those businesses that are already in the area and those in which we are trying to also bring to the area through the development of Dutch John, Utah, and the privatization of Dutch John and the resources that was transferred to Daggett County with the purpose of further development, which was—transferred to approximately 25 hundred acres for further development of the public area to enjoy.

The main three reasons that the—you know, dealing with three reasons that I mentioned earlier, mainly they're recreation benefits. We appreciate the opportunity to comment and we'll make written comments also.

## **Deloy Adams**

My name is Deloy Adams. I'm one of the owners of Flaming Gorge Lodge. We are—we actually own two of the outfitter permits on the Green River from the dam to the Colorado border. And basically I do have some concerns about the action plan, but I will consolidate those in writing.

6a One of—in a conversation I had earlier today with Roger Schneidervin from Utah Division of Wildlife Resources, one of the items he touched on was ramping the flows. And I think as an outfitter that's an area of deep concern not only for the benefit and  
6b welfare of the trout fishery, but one of safety for the public, especially the wade fishermen that are wading at flows of 800 cfs to—there's really nothing that I could see in writing and no specific written agreements to control the amount of flow that could be taken up for generation of power or for an emergency of any kind. Of course, probably in an emergency, it would probably be going the other way from some flow down.

But just this past summer we had several fishermen that were wade fishing down around Little Hole that got stranded with just the flows of going from 800 cfs to 1600 cfs. It would be nice if we could give some kind of notice, even though we have been  
6c announcing to everyone that the flows did come up in the afternoon, but if—at 800 cfs, I don't think there's much—as much problem with somebody getting into trouble as if maybe we jumped from 800 to 24 cfs -- 2400 cfs.

That could certainly put some people in some real jeopardy if they were out in the middle of the river at Little Hole. They would not only would not able—be able to get back to the shore, they would basically be stranded with money—with water coming up at a level that they wouldn't be able to move, and at some point in time being washed down and possibly having a serious accident. So I did want to touch on that.

6d Other than that, probably the biggest concern that I see with the action plan is the temperature requirements and what is of most benefit for the trout fishery on Reach One.

And having said that, I will be putting in a written comment and I appreciate the opportunity of letting me speak, even though I wasn't planning on it.

## **Dennis Breer**

I'm Dennis Breer, B-r-e-e-r. Okay. I planned to sit down today and put my thoughts together on some paper but didn't—didn't get everything done because I got involved in this thing and got carried away and realized it was deeper than what I wanted to get involved in, but.

The first thing I want to do is thank the—for the opportunity to comment on the operation of the Flaming Gorge Dam and the draft EIS and its appendages.

I'm here as a couple of different positions, one as a resident of Dutch John and also secondly as a business owner who lives three miles from the dam and whose livelihood depends on the Green River and consequently is—you know, how the dam is operated affects how my business would be affected as well, so we—you know, thanks for including Dutch John in this process, because I know originally it was not a part of your programming and—which kind of surprised me, because you had Moab on there

and yet the place where the most severe impact is right here in Dutch John and it wasn't included, and so I thank you for putting us on the map for your meeting tonight.

I've been a part of the Flaming Gorge Work Group since its beginnings in '93. So I've got a little more perspective than many folks in that. I've sat through the process of all the efforts that the Bureau of Reclamation has made in order to bring all the interested groups together and really try to form a consensus of, you know, all the—all the various interests that have—that have developed around the Flaming Gorge asset, and—and now the dam has been operated and all the values that that has created.

And so I think I have a good understanding of a lot of the issues, and certainly I think the Flaming Gorge Work Group and I have to say I have to commend the Bureau for making that Flaming Gorge Work Group such an effective organization. So thanks to the Bureau for providing that—that window where everybody can get together and express and exchange values and ideas and try to develop some kind of consensus.

I have two approaches that I want to talk about tonight. In fact, I'm going to have to extend the other one and probably come to the Vernal meeting tomorrow night to make another comment on the economic part of the DEIS, but.

In the biological aspect, I think I've come to support most of the aspects of the biological opinion, and in particular what I'm looking at is that, you know, the flow and temperature recommendations for the threatened and endangered species, as long as they're consistent with the maintaining of and whenever possible the enhancement of the Flaming Gorge Tail water Sport Fishery are certain things that I have interest in. And I think that we have seen a lot of common ground in those work groups where the interest of trout and the interest of T and E fish have had a commonality.

In particular, the recommendations that were made in the DIS—EIS is—that I support are the recommendation of flow limitations, fluctuation limitations, which includes a single daily hump fluctuation. In other words, the absence of multiple fluctuations during the day, and that they be done in a reasonable manner, which the recommendation is 800 cfs on the ascending and descending ramp rates, which I think are extremely important as well so we're not jumping the flows up and down and displacing fish in that effort.

And that's in—basically in line with a lot of the historic operations that have occurred over the last ten years during this interim.

The recommendation also for the 55 degree water—Fahrenheit water temperature releases, you know, really help us maintain water trout temperatures down to the Colorado/Utah state line, and—which, you know, keeps the range of trout from the tail water—in the tail water section extremely valuable to us. So, you know, the further the trout can survive down the river, and that 55 degree Fahrenheit water temperature certainly does that.

Those—those things we can agree on because it's—it's things that I think we share with the T and E fish downriver and—and—in their attempt to effect change and help the T and E fish in their effort for recovery. So, you know, anything—and while my basis is on trout fishing, and the reason that is because I'm tied to the trout fishery here, as a guide and outfitter and also as a sport fisher, having been to this river for many years.

And it's been about—since about 1975, so I have a great deal of interest in the river.

I'm going to probably make some comments tomorrow night. I'm going to show up to the Vernal meeting and make some comments, but the first things that I'd like to say about the economic part of this, and when looking at recreation, recreation in Daggett County and in Dutch John is—is probably keen in terms of economics.

7a And in some of the things that were put into the economic aspects and looking at the consequences of the action or no action alternatives, it really stuck out to me in terms of talking about losses of jobs and declines under certain scenarios, which would be the average dry and wet years, and having seen the last four or five years be extremely dry, you know, and I have to wonder what average is anymore. You know, it just—it is—there's no average anymore that really fits that criteria, and so it's kind of hard to really look at it.

7b But anything that affects jobs in Daggett County is generally affecting—being affected by changes in recreation. And so I'm kind of concerned about some of the aspects that are in the biological opinion, in particular when it comes to the recreation industry, because where I'm seeing the most changes are when it comes not to the Flaming Gorge Reservoir, but to the Green River. And so the impacts on that seem to be the most affected area.

7c Well, then that puts Dutch John itself in the most jeopardy and the Green River activities being in the most jeopardy of having economic consequences, and so that's why I'm very, very concerned if the recreation or the guides and outfitters here are taking the brunt of the change—I read a fact or a statement in here that in the tri-county area that recreational services and also car rentals were a small sector of—very small, only like 2 or 3 percent affecting the numbers of jobs. Well, 2 or 3 percent spread over three counties isn't that much, but 2 or 3 percent really equates into 30 or 40 percent in Dutch John, because we are recreation.

So those aspects I think really need to be evaluated and looked at. And some of the bases for some of the information in here, there's parts of it that just does not make sense to me and I think it's too easy to get into voodoo economics. You can prove or disprove anything by, you know, the facts. And one of the things that I did notice in the—in addressing recreation in here was that a lot of the language is skewed towards the positive side of it.

So I'm going to make written and possibly show up for the meeting tomorrow night about the economics, and I think that our county commissioners should be extremely concerned about the loss of jobs and recreation opportunities on the river under these different scenarios and be very concerned and at least have some idea of what's going to happen as these things move forward.

Biologically I'm very much in favor of the steps that the Bureau has taken in terms of T and E fish and with the trout fishery, but it comes as an economic cost to the local community, and I'm concerned about that.

Thank you.

**Jerry Taylor**

My name is Jerry Taylor. I am owner and operator of Lucerne Valley Marina and Flaming Gorge Corporation. We're concessionaires with the Forest Service. We've been on the lake in operation since 1965. We put Buckboard Marina in originally and sold it to Les Tanner, who still operates it.

And basically we're here to make sure that the infrastructures that are operating on the lake, the marina operations and stuff are represented with their concerns about the economic viability of those operations.

All of the marine operations around Flaming Gorge essentially are marginal marine operations in inland-water waters. They're seasonal in nature, they are—if you look at the economy of scales and if you check with a Ph.D. at Western Illinois University who does inland water marina studies, he will tell you that the economy of scale for marine operations is 300 slips.

8a None of the operations on Flaming Gorge meet that criteria. So if you look at the economies of scale, you're talking about a system that has operating expenses right on the back end of their income on a—on a regular basis, a seasonal basis, and a yearly basis. Because we can't—we haven't achieved the economies of scale that would allow us to have a larger margin to work with.

8b Because we're working on such short margins, our operations are very sensitive to fluctuation of water levels and those kinds of things. Currently all three marinas are going through some transition with the current water levels.

We probably spent an additional \$23,000 in expenses for the '04 operations of Lucerne Valley Marina this year, relative to moving fuel lines, power systems, water systems, communications systems to operate our fuel dock on the other side of the ramp at Lucerne.

Those are things that have a major impact on our—our overall income for this operating season. Coupled with some of the other things that's going on, so what I'm saying is that the operations and the marina operations that are on Flaming Gorge are very sensitive to economic impact. And fluctuating waters is a major thing to deal with.

Our situations are somewhat unique and we do operate on very steep inclines on the lake, except for Buckboard, which has some shallow water warnings. And of course, when they lose the shallow water warnings, then they have to move the facilities even farther to facilitate enough floatation to facilitate the slips in the location on the water, so. They can actually have more impact up there in the shallow operations.

The Forest Service has considered additional marina operations on the lake, which would be Firehole. That's not even feasible under current water conditions for that operation to either be established or to operate under current water levels.

8c So those are some of our concerns. I have attended the flow meetings for this process historically from the time that it first started and will be there each time they talk about the annual flows, and those should reflect the amount of water that's available for Mother Nature for each year's releases.

Thank you.

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## **5. CHAD L. REED, DAGGETT COUNTY COMMISSIONER**

### **5a**

Comment noted.

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## **6. DELOY ADAMS, FLAMING GORGE LODGE**

### **6a**

Ramping the flows is outside the scope of the EIS. However, it is noted that the changes in flows, as part of the operation of the powerplant, are designed to help meet the demand for electricity as usage of electricity increases during the day and decreases at night. Meeting peak demands is currently tempered by environmental and other concerns. This operational detail would be the same under either the Action or No Action Alternative. Please see section 4.4.1 in the EIS which accurately describes the limitations of ramp rates.

### **6b and 6c**

Reclamation agrees that the safety of fishermen and others along the Green River is very important. Currently, through efforts of the Flaming Gorge Working Group, the agreed upon ramping rate is established at 800 cfs per hour. This ramping rate has been the agreed upon standard since the Flaming Gorge Working Group meeting of April 11, 1994. There is prominent signage along the river warning fishermen of the potential for sudden fluctuations. A warning horn at the dam is also sounded before increased dam releases begin. Daytime fluctuations have been a part of operations since the dam was completed 40 years ago, and so are common knowledge among those who have visited the river in the past. Nevertheless, Reclamation continues as part of its

management of Flaming Gorge Dam to pursue all reasonable means of providing notification to the public of river fluctuations and other public safety concerns.

### **6d**

See section 4.7.2.4.1.2 in the EIS. In dry and moderate years, 55 °F (13 °C) water would continue to be released from the dam as it is currently, resulting in no more impacts to trout during summer months than are currently sustained. Long-term negative effects to the trout fishery are not expected under the Action Alternative.

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## **7. DENNIS BREER**

### **7a**

Average, wet, and dry flows and reservoir water levels by alternative were estimated by the hydrologic model by superimposing Action and No Action Alternative operations on conditions experienced across a hydrologic period of record.

### **7b**

The EIS shows that Green River recreation visitation could be negatively affected, particularly during wet and dry conditions.

### **7c**

While lack of county specific recreation expenditure data precluded a county by county socioeconomic analysis, the loss of Green River recreation visitation and expenditures during wet and dry conditions (each estimated to occur 10 percent of all years) may suggest adverse impacts to Dutch John. Gains on the reservoir may outweigh losses on the river for certain businesses, while others (e.g., commercial guide operations) may be disproportionately affected. The point that a relatively small loss within the

three-county area, if concentrated within a single county or community, could occur is well taken. Clarifying text was added to section 4.12 in the EIS.

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## **8. JERRY TAYLOR, LUCERNE VALLEY MARINA**

**8a-8c**  
Comments noted.



PUBLIC HEARING  
HELD: OCTOBER 21, 2004, 6:00 P.M.  
AT: WESTERN PARK CONVENTION CENTER  
300 EAST 200 SOUTH  
VERNAL, UTAH

**Steven Romney**

I've already left a copy of my oral record with your recorder. This will be surely less than five minutes, but I'll just read it off quickly.

I am Steve Romney, director of the Uintah Mosquito Abatement District that's located now coming up on 30 years in Vernal, Utah. And I'll present my commentary.

This is specifically as per the Green River Bottomlands Reach 2 of Project Area That's fundamentally our major operating area as far as the river drainage goes.

All right. I'll just quickly read this and go from there.

"When seasonally flooded with river sub-up or overflow water, the Green River bottomlands region in question presents enormous acreages of some of the most productive aquatic mosquito habitat in western North America. Literally millions of mosquitoes per acre can be produced. Many thousands of acres of such habitat are involved. The most important mosquito species are of the genera *Aedes*, *Ochlerotatus*, *Culex* and *Anopheles*. Some floodwater species can and often do migrate in staggering numbers as far as 20 or more miles from their bottomlands points of origin and present a substantial threat to the public health, veterinary health, ranching and agriculture, outdoor recreation, outdoor commerce and the economically vital tourist industry in Uintah County.

"Of new and greatest concern is the ongoing potential for the large scale river bottomlands production of the mosquito species *Culex tarsalis*, an extremely abundant and highly competent local vector of West Nile Virus. Ecologically, the additional and superbly productive mosquito habitat to be activated with the artificially enhanced and prolonged flooding of the Green River periphery presents a reproductive bonanza for this now critically important species. Due to the flattened, almost level contour of much of the Green River bottomlands topography, even minor increases in river elevation at high water can translate into huge additional acreages of sub-up and overflow mosquito habitat.

"The presence of mosquito-borne West Nile Virus in Utah was first documented in the late summer of 2003. That year the first human and equine West Nile Virus infections ever recorded in Utah were acquired in Uintah County"—not too many feet from this building. "Our neighbor state of Colorado suffered an incredible 2,947 human West Nile Virus infections in 2003. 63 were fatal. At season's end, 2004, ten human West Nile infections had been recorded in Utah. Two cases were acquired in Duchesne County. The newly arrived virus is now permanently established in the Uintah Basin and many other regions of Utah. The 2005 and future seasons will thus undeniably present every real possibility of severe outbreaks of mosquito-borne West Nile Virus in local human, equine and reservoir bird populations.

9a “The above is a far too brief but absolutely valid account of the circumstance at hand. I struggle with what would seem to be a lack of meaningful onsite field observations having been conducted for the EIS assessment of the potential impact of various Flaming Gorge operational scenarios on bottomlands mosquito production. Over some thirty years of very personal interactions with Green River mosquitoes I have repeatedly found that far more can be learned by wading in their habitat rather than flying over it in the course of aerial surveys of the same.

“Some Fair Questions:

9b “Are the hoped for research benefits which might be gained by way of the controlled release of Green River flows so as to both substantially increase and artificially prolong the flooding of the river periphery worth the for certain harmful public health and economic impact which would be forced upon the citizens of Uintah County? Simply put, more water in this case means far more mosquitoes, some of which the next time around may be able to kill you.

9c “Large scale Green River bottomlands mosquito control is extremely expensive and, for numerous logistical and biological reasons, is immensely challenging. It demands perfectly timed and repeated low-level aerial applications of degradable biological control mosquito larvicides to aquatic mosquito sources dispersed throughout some 50 linear miles of remote, often densely vegetated, nearly impenetrable river periphery. The Uintah Mosquito Abatement District is funded by local property taxes. Should Uintah County citizens be the only ones to pay for the best possible and utterly essential control of what will be much larger and medically important mosquito populations when their otherwise simple prevention is wholly dependent on the whim of the Recovery Program for Endangered Fish Species?

9d “When the Operation Of Flaming Gorge Dam EIS ‘Action Alternative’ is inevitably implemented, I will be requesting that the Uintah Mosquito Abatement District (and thus the taxpayers of Uintah County) at least be awarded full and fair federal compensation for those additional, much higher public health mosquito control expenses which will ultimately result from that policy decision.

“Such supplemental federal funding for Uintah County public health mosquito/disease vector control, though in no way fair compensation for the true extent of the adverse consequences of the ‘Action Alternative,’ would at least to some limited extent serve to elevate our citizens above the status of hapless victims in this matter. From a mosquito’s perspective, federal funds in exchange for Uintah County’s blood may seem like a good deal.

“Thank you for your valuable time and attention.

“Steven V. Romney, Ph.D., Director, Uintah Mosquito Abatement District.”

Thank you, gentlemen.

**Edmond Wick**

Yeah, I think—I will not be submitting written comments, but I was over here working on a field project and heard about the meeting, decided I'd come in and comment a little bit.

I'm just a consultant at the present time and I've worked for the National Park Service, the U.S. Fish and Wildlife Service, and Colorado Division of Wildlife on endangered fishes for about 25 years, and would like to just point out a few areas of the report that I thought were a little bit inconsistent and might need some rewriting.

And my main concerns center around the timing of flows. In other words, I agree quite a bit with the magnitude levels of the flows that you're proposing, but the work that we've been doing on sediment issues in particular have brought up a lot of issues concerning the timing of flows.

And on page S-30 of your summary report here, on Table S-7, a lot of the flow timing of the releases from Flaming Gorge are based on the Yampa River peak flows. And what we've found over the years is the Green River and the Yampa River often do not coincide with the peaks.

10a And I understand that the reason we try to time the releases of Flaming Gorge to coincide with the Yampa is obviously to—you know, to get the maximum peak flow. But in reality, these peaks have not coincided often and the Green River many times peaks a lot later.

10b And the work we've been doing with razorback suckers in particular show it's problematic in terms of sedimentation on the spawning bar when the flows from Flaming Gorge are released early coinciding with the Yampa, because we initiate sediment transport in the river, which tends to deposit sediment over the spawning bar.

So I see here that on page, I guess it's S-25 -- or 24 -- 24 and 25, you have a table called S-4. And I understand that during average years that we have a set of criteria on which we'll initiate the onset of peak flows. And some of those criteria are, for instance, the initial appearance of larval razorback suckers in the river and the condition of habitat for razorback sucker adults on the spawning bar and young.

10c And you'd find that in many cases what you need to do perhaps is reference back to your different tables and so forth and clarify that on the years you're indicating that one out of three years, particularly on average years, that you would have flows that would be relatively high that would help the razorback sucker. That's what that's for. So that in many cases you have to override your one statement of coinciding with the Yampa should be overridden by the factors concerning the life history of the razorback sucker to make sure that the spawning habitat is protected.

10d So I think what I see here is kind of a conflict of one table versus a general statement of matching Yampa River flows. It kind of conflicts because very seldom do the appearance of larval razorback suckers coincide with the flows of the Yampa River.

So that's my main concern, and I guess from our work that we've seen over the years, we've seen a lot of problems with flow timing, for instance, in wet years the tendency is to release flows early in May and wet years prior to even the Yampa peaking. So what's happening is the Flaming Gorge initiates large releases prior to the Yampa even peaking. And that combining with the Yampa flows initiates tremendous sediment transport and problems.

10e So what's happening is a lot of times during wet years when we could maximize production of razorbacks because the flood plains are available, we see poor production. So in order to improve the situation long term, we need to go ahead and probably do more management in average years for razorback, because that's when we get the best production. So we need to clarify those tables that I mentioned and clarify those statements.

**Melissa Trammell**

I'm Melissa Trammell and I'm representing the National Park Service, and I'd like to say that basically and in general we think that the flow and temperature recommendations and the way that the EIS has been laid out represents an improvement in the situation on the Green River and probably additionally protect resources in Dinosaur National Monument.

11a Having said that, I will go on to say that we don't necessarily think that the EIS has gone far enough in the right direction, particularly in terms of peak magnitude of spring flows. And we hope to work within the adapted management system after the EIS is implemented to encourage more variability, annual variability with flows in the upper end of the range.

And that's all I have.

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## **9. STEVEN ROMNEY, UINTAH MOSQUITO ABATEMENT DISTRICT**

### **9a**

The EIS uses the best available information as called for by the CEQ regulations implementing NEPA. Reclamation relied heavily on Dr. Romney's input to ensure valid data. In site visits along the Green River near Jensen during June and July 2005, Reclamation staff discovered the greatest concentrations of mosquitoes in and adjacent to irrigated crops rather than in or near standing water in the flood plain.

### **9b**

We do not anticipate adverse consequences to humans if the 2000 Flow and Temperature Recommendations are implemented. The river flood plain is likely to be inundated in wet years under either alternative.

### **9c and 9d**

The EIS acknowledges (section 4.13.3.) that the proposed action will increase mosquito habitat to the greatest extent in Reach 1, and to a lesser extent in Reach 2, which includes the town of Jensen as well as Uintah County. Based on our analysis, Reclamation believes that the increased risk of diseases such as West Nile virus, compared to other potential vectors for the disease, including irrigation and standing water on private property closer to population centers, is so small that it is insignificant. We do not anticipate a linkage between Reclamation's proposed action and an increased threat from West Nile virus or other mosquito-borne diseases.

Reclamation notes that the issue of mosquito control along the Green River has been discussed annually at the Flaming Gorge Working Group meetings, and we expect such dialogue to continue

in the future, whether or not the proposed action is implemented. As noted in section 4.21 of the EIS, Reclamation is committed to continuing dialogue with county officials to explore the potential to assist with mosquito control.

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## **10. EDMOND WICK**

### **10a**

It is true that the Green River peak flows naturally occur later than those for the Yampa River. In order to minimize impacts to the authorized purposes of Flaming Gorge, however, the most optimal timing of peak releases is when the Yampa River peak flows occur. If releases from Flaming Gorge Dam are timed to be later than the peak flows of the Yampa River, the releases from Flaming Gorge Dam would have to be greater in magnitude and duration to achieve the flow objectives.

### **10b–10e**

The 2000 Flow and Temperature Recommendations are intended to aid in recovery of four endangered fish species by restoring a more natural flow regime to the Green River. The authors of the 2000 Flow and Temperature Recommendations recognized that certain aspects of the flows may affect certain species differently than others. Razorback sucker historically have spawned on increasing and peak runoff flows. One objective of spring peak flows is to entrain razorback sucker larvae in flood plain depressions, so it is possible that dam-release augmentation of the Yampa River peak flow would occur after spawning activity. Decisions regarding the timing, duration, and magnitude of peak flows within a given year under the Action Alternative would be made with input from the Technical Working Group which will evaluate criteria listed in table 2-5 when

making recommendations. Additionally, the Recovery Program has and likely will continue to monitor both timing of endangered fish reproductive activity and geomorphic processes for the purposes of contributing to the flow planning process. The 2000 Flow and Temperature Recommendations recommend use of such information gathered by the Recovery Program in determining the specific magnitude, duration, and timing of flows within any given year; and the EIS further recognizes the role(s) of continued research and monitoring in

refinement of flow recommendations through an adaptive management process.

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**11. MELISSA TRAMMELL,  
NATIONAL PARK SERVICE**

**11a**

Comment noted.