

**Comments Received from TWG and AMWG in April 2001
With Responses from the Ad Hoc Committee on Strategic Planning
Developed April 30 and May 1, 2001**

**Comments on Strategic Plan Narrative from TWG
Received April 2001**

	Comment	Ad Hoc Committee (AHC) Response
1	First, I don't believe the document is a plan. Rather, it is a lengthy description of the AMP process. The "Action Plan" unwritten section is the MOs, not an action plan. Somehow, there should be a discussion on how the groups can work together to make progress towards a common goal. This "common goal" also does not appear in this document. All goals, "achieve desired future resource conditions" or "meet the intent of the GCPA" or "shared vision" are too esoteric, untouchable and unachievable. I believe something more concrete and attainable should be in this document, e.g. "run flows through Glen Canyon Dam that benefit as many resources as possible."	The AHC is comfortable with the plan as it is being drafted. When the goals and MOs are added to the narrative, it will serve as a plan. The action plan could include how all agencies work together for the common vision.
2	The document argues for a multi-resource approach, yet references laws, guidance, and single agency-driven intent to do otherwise. Somehow, that part of the plan needs some level of resolution. As an example, NPS does not allow "impairment" of a resource. However, through the AMP process, there could be a recommendation that would have such an impairment. The document argues for no management for a specific resource or species. Yet, it is being done with some species. The AMP is a multi-resource approach only in that it considers all resources when making a management decision.	The goal of this program is an ecosystem management approach, with attention paid to mandates to address sensitive resources.
3	The entire document needs to be edited for acronyms.	Concur.
4	Pg. 1, Line 6 - after the word "Program" insert "(AMP)"	Concur.
5	Page 1, line 6-13: The Introduction should set forth the structure of the Plan.	See lines 12 and 13 on page 1. In addition, a table of contents will be added to the final version of the plan.
6	Page 1, line 12: A purpose is referenced but not stated. Suggestion from Page 21, line 45: The purpose of the Strategic Plan is to outline the path for "evaluation of the effectiveness of actions taken to protect downstream resources," or something similar.	Concur. "... purpose, to evaluate the effectiveness of actions taken to protect downstream resources. The nature of the adaptive management program is to monitor the effects of the ROD and experiment to verify that these changes are indeed producing the expected benefits and

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		are meeting the intent of GCPA, and to advise the Secretary of the findings. This plan describes the history..."
7	Page 1, line 14: Should the next few sections be collected under a heading of " Background? "	Concur. Strike "Introduction" on line 4, and add "Background" on line 14.
8	Page 1, line 18, place "(secretary)" after the word "Interior."	Concur.
9	Pg. 1, Line 38 - spell out the first "GCES."	Concur.
10	Pg. 2, Line 2 – strike the word "some", replace with " the development of recommendations to the Secretary of the Interior regarding"	Concur. Delete "of the Interior" throughout.
11	Pg. 2. Line 11 – delete the word "primary." (The GCPA does not identify primary and lesser mandates).	Concur.
12	Pg. 2. Line 11 – change "mandate" to "mandates", and "is" to "are"	
13	Page 2, line 18: The " History... " section mentions the Guidance Document, but does not reference it. It is apparently intended to be included in the Appendix, but still requires a reference or citation and some description in this section or under " Institutional Scope. "	Concur. A bibliography will be developed.
14	Page 2, line 29, change "effect" to "affect."	Concur.
15	Pg. 2. Line 30 – after the word "controls" add "the level of"	Concur.
16	Pg. 2. Line 34-35 – delete all the first sentence, (unless you are 100% sure of its accuracy).	Concur.
17	Page 2 line 35: Insert "and" between "compacts," and "treaties."	This sentence has been deleted.
18	Pg. 3. Line 15 –21 – this is a quote of Section 1802(a) of GCPA. Request that Section 1802(b) be added to provide a complete discussion of the intent of GCPA.	Concur. The paragraph will be continued with section (b).
19	Page 4, line 4-8: The next two sentences starting at "The GMP..." could be removed.	The AHC felt these were important current and historical references.
20	Pg. 4. Lines 20-27 – As written this paragraph contains a selection of quotes from the ROD. Request that the following quote from the 2 nd paragraph on pg. 1 of the ROD be added on line 22 between the two existing quotes. " Analysis of an array of reasonable alternatives was needed to allow the Secretary to balance competing interests and to meet the statutory responsibilities for protecting downstream resources and producing hydropower, and to protect affected Native American interests."	Concur.

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21	Pg. 4. Line 25 – strike "limited' replace with "limiting"	Concur.
22	Page 5, line 29: The first sentence should be removed. In general, this section could be more simply stated, less conceptual, and directed more specifically at GCD and the AMP.	The first sentence is replaced with: Adaptive management is a collaborative, science-based approach to resource management.
23	Pg. 5. Line 40 – strike the words "back into the decision process for determining" and replace with "into recommendations to the Secretary regarding"	Concur. Also, move lines 34-41 to page 6, line 13. Page 7, line 3, MO will ask Pam to indicate where the quote begins, and to check for accuracy.
24	<p>I have a major concern with the Introduction on page 6, line 7, especially the statement:</p> <p>"What is being managed is a population or ecosystem, not individual organisms or projects. Failures at the individual level need to be tolerated because risk-taking is needed if hypotheses are to be advanced and tested."</p> <p>This seems to clearly pointed to what has been done relative to management of the Kanab ambersnail. This process, particularly the Fish and Wildlife Service, has been extensively criticized, from within the process and from outside the process, for managing for individuals rather than the ecosystem, based on what has been done for the Kanab ambersnail.</p> <p>I don't doubt for a second that what we have done for this species has been totally consistent with ecosystem management. In our imperfect world, conservation of threatened and endangered species is a necessary and appropriate part of ecosystem management.</p> <p>We can't manage the ecosystem without paying attention to the individual parts of that ecosystem. When individual parts of the ecosystem are threatened or endangered, that is a clear signal of a specific problem that needs to be addressed. These threatened and endangered species are the weakest links, the loss of which can result in the failure of the ecosystem. From the legal standpoint, the ESA doesn't give us the option of tolerating failures at the individual level. This is not only for the benefit of the individual, but ultimately for the benefit of the ecosystem. The focus of the ESA is not the individual species, but the ecosystems</p>	<p>This is a quote from Kai Lee, not a comment on KAS. The AHC agreed to add the following at the beginning of line 16, page 6: "The goal of this program is an ecosystem management approach, with attention paid to mandates to address sensitive resources."</p>

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	<p>upon which they depend.</p> <p>I realize that it is possible to focus on individual species to the degree that you do overlook needs for the ecosystem, but I don't believe that has been done in this instance.</p> <p>On page 7, it says that long term monitoring answers the basic questions, "are the resources being protected and preserved?" and "are conditions improving, stable, or degrading?" It seems to me that what we have and are doing for the Kanab ambersnail is a direct response to these questions.</p> <p>Page 8 and 9 specifically talks about this issue. It states that in designing experimental flows, a whole suite of biological factors need to be considered, from aquatic food base to the endangered Kanab ambersnail, etc. This is true, but there is an order of priority that also has to be considered. At least for Federal agencies, T&E species are a high priority.</p>	
25	Page 6, line 28-37, these paragraphs should be removed.	The AHC decided to keep the sentences in.
26	Page 6, line 40, "generators" is not capitalized.	Concur.
27	Pg. 6. Line 40 – the USBR may want to review its history here – actually the 1978 proposal was to add additional units onto the outlet works, later came the proposal to rewind and upgrade the turbines to allow higher water flows. By 1982 the additional unit idea was dropped.	<p>"... surrounding proposals to install additional generators on the bypass tubes, and to rewind and uprate the existing generators at GCD, resulting ..."</p> <p>Line 41: "The intent of the studies was to determine the effects of dam operations..."</p>
28	Page 6, line 43, remove the comma after Reclamation.	Concur.
29	Page 7, line 10, change "TWG" to "Technical Work Group (TWG)."	Concur.
30	Page 7, line 24, remove the last period.	Concur.
31	Page 7, line 26, remove the use of the word "our." Same for line 33.	Remove "our." Change "our belief" on line 33 to "Understanding." Remove "even basic."
32	Pg. 7. Line 33 – delete the word "belief", replace with either "knowledge" or "understanding"	
33	Page 7, line 33: Replace the word "belief" with "Understanding."	
34	Page 7, line 38: This section has enough similarity with " Roles and Responsibilities " on page 11, that consideration should be given to combining the two sections into one.	The AHC felt that this section flows well with the next two sections. The heading was changed to "Management within the GCDAMP."

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35	Page 8, line 4, the sentence starting "The AMWG..." does not make sense. Voting occurs on all recommendations and voting doesn't have anything to do with consensus.	The AHC felt the existing sentence accurately describes how the AMWG should operate.
36	Page 8, line 11, the term "Guidance Document" is unclear. I don't know what it is or why it is capitalized.	"The Guidance Document (attached)..." Also, add Guidance Document to the list on page 19.
37	Pg. 8. Line 29. - delete the word "oversight" and replace with "review" (the term "oversight" implies management or control which is not a function of the SAB)	Concur. Also, add "independent" before "review."
38	Pg. 9. Line 2 - after the word "resources" add "such as recreation and power generation."	Remove the sentence because "human-based resources" doesn't clarify the issue. Page 9, line 1 "... management of one resource (natural, cultural, recreational, economic) produces unexpected..."
39	Page 9, line 3, this last sentence is not correct. All resources must be considered, but not necessarily managed as a whole. The AMP process allows consideration of impacts to resources as an informed decision. Not all resources will be treated equally.	Substitute this for the sentence starting on line 3: "Benefits and impacts to all resources must be considered and managed in order to produce a desirable and sustainable result."
40	Page 9, line 6-22, remove this paragraph.	The AHC felt this historical example is useful.
41	Pg. 9. Line 20 – after the word "impact" add "There would also be significant impacts to power generation."	Concur.
42	Page 9, line 43: Some examples of " other management actions" would be instructive.	"... its purposes. Examples of other actions include water temperature control, stabilization of cultural sites, non-native fish control, and removal of non-native vegetation."

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43	Page 10, line 7: Delete "that are necessary."	<p>"Despite these limits, the AMP provides information necessary to determine efficacy of the ROD to meet its intended purpose under the GCPA, as well as recommendations on dam operations and other management actions to the Secretary."</p> <p>Line 10: "In addition, the AMWG may coordinate with other organizations and programs and offer recommendations to the Secretary regarding actions that may be undertaken by other agencies. Activities outside the scope of the AMP 'will be funded separately ... "</p> <p>Change heading on line 30 page 9 to "Geographic and Programmatic Scope."</p> <p>Add a paragraph on page 10, line 28: "The AMP may do research outside the geographic scope defined above to obtain needed information." Move the sentence starting "Such linkages..." (line 13) here.</p>
44	Pg. 10. Lines 22-24 - This description of the lateral scope is inconsistent with the Guidance Document description as well as with the definition of the CRE contained in the goals document. Suggest that instead of using "NHPA" as the parameters, that CRE or other language from the Guidance Document be used.	<p>NHPA activities are part of this program. Section 106 refers to a federal agency taking an action. Section 110 addresses a federal agency responsible for management of an area.</p> <p>Page 10, line 22: "... ongoing discussion involving the effects of dam operations on the APE as it relates to compliance with Section 106 of the NHPA, the effect of tributaries on the mainstream Colorado River, and the potential effects of the operation of the power plant, bypass tubes and spillways of Glen Canyon Dam. It includes ..."</p>
45	Page 10, line 22, this entire paragraph should be rewritten to be more generic. Each resource has a different lateral extent, so it should only be to the level to which impacts can be identified for each resource.	<p>No, this is from the EIS.</p>
46	Page 11, Figure 1: Is this the most recent figure from D. Kubly's presentations?	<p>Concur.</p>
47	Page 11, line 4 and line 29: Capitalize 'final'	<p>This will be changed at the first use of the phrase.</p>
48	Page 11, line 6, replace "(IRPs)" with "Independent Review Panels (IRPs)."	<p>The FEIS indicates that the designee chairs the AMWG.</p>
49	Page 11, line 35: "Co-chairs the AMWG."	<p>Randy will research the current role of the Secretary's Designee for inclusion in the document.</p>
50	Pg. 11. Line 36-37 and Pg. 12 Line 1-3, - Suggest you review the duties of the "designee". While these duties were anticipated in the EIS, they are not so defined in the AMWG charter or operating procedures. Doesn't the responsibility for ensuring DOI compliance and acting upon the AMWG recommendations remain with	<p>Page 11, line 29: "... were originally defined in the GCD FEIS (pages 34-38) and are currently as follows:"</p>

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	the Secretary?	
51	Pg. 12. Line 14 – after “of” add “ROD,” after “changes” add “and other AMP activities that may affect flow patterns.”	This is a direct quote from the FEIS, and the AHC decided to keep it as is.
52	Page 12, line 17 or 29: One or both of these sections should include the liaison function with the research scientists (PIs).	Between lines 39 and 40: new bullet: “Facilitates interaction between scientists and TWG and AMWG.” New bullet under GCMRC: “Coordinates research and monitoring activities with NPS and tribes.”
53	Page 12, line 32: ... managing all data ...	“... managing all data collected <u>contracted to be delivered</u> to GCMRC as part of those programs...”
54	Page 12, line 33: <u>Ensures development of</u> Develops research designs and proposals for implementing...	Concur.
55	Pg. 12. Line 35 - after “operations” add “and/or other management actions	Add “... and other management actions.”
56	Page 13, line 5: Replace this bullet with: Provides reviews of the AMP monitoring and research programs, including GCMRC and PA.	Concur.
57	Page 13, line 12: This section should include the Guidance Document, and Interim Surplus Criteria EIS and ROD.	These will be listed in the relevant documents section, but the AHC felt the impact is not significant enough to warrant separate discussion in the institutional scope section. Include the Interim Surplus Criteria EIS and ROD in the “List of Guiding and Relevant Documents” section, page 18 line 31 All the guiding and relevant documents will be included in the website, and the website will be referenced in the guiding documents section.
58	Page 13, lines 17-43: This description should include a paragraph directly describing the “influences” or “influenced by” relationship to the AMP as is presented in the PA and BO sections.	See lines 38-43.
59	Pages 14-15, lines 37-25: These paragraphs are process that can be incorporated by reference and not described. Page 15, line 27: With the above deletion, spell out Biological Opinion, and insert after “...agency” “resulting from formal consultation procedures described in the implementing regulations.”	This is included so that folks involved with the AMP become more informed about and sensitized to ESA issues.
60	Pg. 15 Line 38 – after “these” add “currently”	“... respect to the AMP, several BOs contain RPAs with significant

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		responsibilities for Reclamation. These include the requirements of." Randy will put together a list of all the BOs and RPAs impacting the AMP.
61	Page 15, lines 38-39: Delete "the requirements of."	This has been re-written.
62	Page 15, line 41: Delete "the establishment of" and insert "making every reasonable effort to establish..."	The existing language is a quote from the BO. (Randy will check on this.)
63	Pages 16-17, lines 6-44 & 1-8: This description should include a paragraph directly describing the "influences" or "influenced by" relationship to the AMP as is presented in the PA and BO sections.	Add a sentence at the end of line 9: "Therefore, AMP activities will have an influence on the NPS resources, and the NPS activities will influence resources under the purview of the AMP."
64	Page 17, line 15, remove the words "The Bureau of."	Concur.
65	Pg. 17. Line 28 – after "area," add "which includes"	"... which includes Colorado, Wyoming, Utah, Arizona, New Mexico, and Nevada."
66	Pg. 17 Line 29 – after "states" add "and Arizona and Nevada" (it would probably be clearer to just list the six states.)	
67	Page 18, line 1, change "dam" to "Dam" and change "are" to "is" or rephrase the sentence.	Concur.
68	Page 18, line 31: This section should include the Interim Surplus Criteria EIS and ROD. Can this section be somehow combined with the other two sections that list and describe documents, citations, etc, on pages 3-5?	Concur with the first sentence. Separate the list into controlling legal documents, and relevant documents that are cited in the bibliography. The AHC will make sure the list is complete and separate it into the two lists at the next meeting. Concur to consolidate the bibliography: 4-5, 18-19 all are moved to the bibliography.
69	Page 20, line 30: Replace "described" with "as referenced."	Concur.
70	Page 20, lines 37-39: This sentence is another possible "purpose" for the Introduction	Concur.
71	Page 21, line 1, decisions are not made by consensus.	Randy will check on whether decisions are made, and if so, if they are made by consensus or consultation.
72	Page 21, line 22: Either in the SCORE Report or Annual Science Plan there needs to be a statement about annual progress reporting on current year monitoring and research projects.	Concur. Page 22, line 3: "The annual work plan will include a report on the prior year's activities."
73	Pg. 22 Line 40 – add a paragraph here that discusses the "conflict of interest" that arises from having TWG and AMWG members who also bid in the RFP process.	The AHC felt this policy should be further developed before it is included in the Strategic Plan.
74	Page 21, line 44: Delete "As explained in	Concur.

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	the description of adaptive management.”	
75	Pages 24-28. I don't believe that the sections, Internal Strengths and Weaknesses, External Threats and Opportunities, Legal Sideboards Within the AMP Operates, Cultural and Social Issues, and Constraints and Barriers to Achieving Goals should be part of this Plan. These are internal issues for our concern only.	Concur.
76	Pg. 23. The whole discussion of strengths and weakness needs to be edited to take out the "I"s and "We"s and "You"s.	This page has been deleted.
77	Pg. 23 Line 37 - Suggest changing "alternate" to "additional and alternate.”	
78	Page 23, line 3, remove references to "I," and throughout this section remove all similar references.	
79	Pages 23-24: I tried, but cannot fix the Internal Strengths and Weaknesses Section. It needs to be rewritten. Below is my shot at the first two paragraphs:	
80	Page 23, line 10, remove last three sentences.	
81	Page 23, line 15, this entire paragraph should be rewritten to be less subjective. This seems to personally criticize people and efforts, and is inappropriate in this document.	
82	Page 24, lines 31-32: Delete “, and is exacerbated by....”	This page has been deleted.
83	Page 24, line 35: Replace "will not" with "may not.”	
84	Pg. 24. Lines 6-7 - The last sentence beginning "The only effort to prioritize the M Os..." is inaccurate and biased. The earlier effort was to prioritize the I Ns, and it is a judgment call as to whether that effort was inadequate and without scientific oversight. Suggest the sentence be deleted. See also "General" comment below regarding NRC recommendations.	
85	Pg. 24. Line 27-32. This paragraph is not accurate. Actually, the present threat to funding is not the power contractors but lack of total support in Congress, as well as the DOI and the Administration which has cut back the USGS funding for the program. Suggest this paragraph be rewritten to just state that funding for research and monitoring from power revenues is provided by law and that additional funding is critical to the AMP and maybe be difficult to obtain.	
86	Page 24, line 30, remove this last sentence.	

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87	Page 24, line 37, add a comma after "resources."	
88	Page 24, line 41, move this paragraph in front of previous paragraph since it deals with funding.	
89	Page 25, line 9: Delete "we have before us."	This page has been deleted
90	Page 25, line 10: Insert after "dam" "is possible." Delete the sentence "In our transition...."	
91	Page 25, line 9, hyphenate "multi-use."	
92	Page 26, line 4, hurdles or obstacles are not necessarily meant to be "overcome." Rather, the AMP decision-making needs to accommodate or adjust for them.	This page has been deleted.
93	Page 26, line 11, this paragraph should be re-written since there is more than one thought here. The discussion of how the laws are at variance is a significant issue. Litigation is a separate thought and should be discussed separately.	
94	Page 26, line 14, remove phrase, "including ESA and NHPA to name two."	
95	Pg. 26. Line 15-17 – Is this accurate – what litigation are you referring to, when did it occur, who were the parties, and what was the outcome?	
96	Pg. 26. Lines 28-29 - Not sure what all is intended in reference to "state and federal funding" sources. Until outreach efforts are made to obtain additional funding sources, such as foundation grants, we suggest references that appear to "close the door" on other funding sources be excluded from this type of document.	
97	Page 26, line 33, change to read, "The processes that formed the Grand Canyon are still at work and will continue regardless of the AMP temporary influence." Remove the rest of the paragraph.	

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98	Page 26, line 40, this paragraph needs to be rewritten due to multiple ideas. I don't think antecedent conditions are a constraint; the past should not be a constraint now. Time is more of an issue in the present situation, since conditions are changing, and without good monitoring, we can't even interpret the change (for good or bad). The section on political viability is important, but the reference to the energy crisis as part of that is inappropriate. Rather it should mention that funding and public support and swing at any time, and the AMP could be affected.	
99	Page 27, line 17, remove the sentence beginning, "Endangered species..."	This page has been deleted, up to line 33.
100	Page 27, line 22, change "shear" to "sheer."	
101	General Comment: Until the NRC Downstream Report recommendations have been addressed and consensus reached on which recommendations to adopt, references from that document should be deleted. This could be addressed by compiling the views of the AMWG Ad Hoc NRC Report (Downstream) Group and distributing them to the AMWG.	The AHC felt references to the Downstream report were appropriate in the Strategic Plan

Comments on MOs from AMWG
Received April 2001

	Comment	Response
102	<p>MO# 12.1; Qualitative Target reworded as: "The target level is to develop and compile that amount of socioeconomic data that is necessary and sufficient for informed and scientifically-defensible decision making. The target level cannot be precisely stated with certainty at this time, but will vary depending on which attribute (hydropower, air quality, wilderness, recreation, non-use values and tribal and spiritual values) is being considered and upon the type of decision being considered. The AMWG recognizes that it may be practical to consider other, similar types of endeavors and to make data determinations based on experience gained in other basins with similar circumstances and in support of corresponding efforts of this type. Guiding principles include reversibility of conditions resulting from decisions and the degree of cascading impacts that subject decisions may have on other associated and collateral resources.</p> <p>"It is also recognized that what is deemed to be "adequate" is a relative and subjective matter. Accordingly, balances must be struck between budgetary and other resource constraints, ensuring that sufficient data is in hand to make informed decisions, the timeliness of available data and the requisite time-frame available for and associated with making decisions."</p>	<p>AMWG revised the original qualitative target to be more concise. The AHC supports the current language, with the following change:</p> <p>The target level is adequate socioeconomic data for making recommendations to the Secretary.</p>
103	<p>MO# 12.2; Qualitative Target reworded as: "The targets are 1) obtaining an increased understanding of historical cultural and environmental interactions of humans within the Colorado River Ecosystem; 2) obtaining a good working knowledge, sufficient to serve as a present-day baseline, of current cultural and environmental interactions of humans within the Colorado River Ecosystem and 3) to assure that sufficient quantitative and qualitative data regarding human cultural and environmental interactions with the CRE are obtained present-day and in the future so as to ensure the future monitoring and research program is able to adequately characterize present interactions."</p>	<p>The target has been revised to read: The target level is adequate cultural and environmental data for making recommendations to the Secretary.</p>

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104	MO# 12.3; Qualitative Target reworded as: The target is implementation of a GCMRC Strategic Plan that enjoys the support and has obtained the approval of the AMWG. The Strategic Plan will be revised on a periodic basis, recognizing that reducing uncertainty and appropriate use of well-reasoned, cause and effect experimentation and hypothesis testing are important tools in improving resource management in the CRE.	The AHC supports the current language, as revised by the AMWG at its last meeting.
105	MO# 12.4; Qualitative Target reworded as: The target is implementation of the AMP's strategic plan in a manner that provides credible, relevant and scientifically defensible mechanisms for addressing and confirming perceived understandings, hypotheses and unknowns regarding collaborative, integrated resources management.	The AHC felt the existing wording captures this intent.
106	MO# 12.4; Qualitative Target for "participation" attribute, should be added and my suggestion is the following: The target for AMP participation is to have all entities represented on the AMWG being actively involved with the AMWG and TWG's deliberations and activities, willingly participating and informed in advance of each meeting and generally "up to speed." Each member should feel that their input is recognized, valued and being considered.	The target is to have all AMWG and TWG members actively involved with AMP deliberations and activities, and their input recognized and valued.
107	MO# 12.5; Qualitative Target reworded as: The target is assuring that effective, legally-mandated and timely government to government consultation occurs. Inclusion of tribal values and perspectives will be reflected in proposals put forward by the GCMRC and AMWG and TWG leadership and in decisions made by those bodies and by the Department of the Interior.	The AHC prefers the active tense in the first sentence. The intent of the second sentence is captured in the glossary definition of tribal consultation. The issue of funding is important to the tribes.
108	Address what is within the scope of the AMP.	The AMWG will address the scope issue once the Management Actions and Information Needs are completed. It would be premature to do so before, because some MOs will have shared responsibility. (The language in the 2001 Energy and Water Appropriations Act specified that ESA and PA issues are included as part of the AMP.)
109	Prioritization should be part of the Strategic Plan.	AMWG established a TWG committee to adjust the current work plan to stay within the 2002 budget. For the Strategic Plan being developed now, the AHC recommends that a process

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		<p>be developed that has as its purpose to give direction to the GCMRC on what should be included in their future annual work plans. The AHC recommends that this process put the INs and MAs in sequence order. Participants will base their sequence decisions on considerations such as relative importance, urgency, legal mandates, what's known and not known already, logical order of completion, and consideration of work already underway.</p> <p>The AHC recommends that entire TWG (excluding those with conflicts of interest) be involved in this process, and that it begin as soon as the MAs and INs are available. The TWG would use the results of the process to make a recommendation to the AMWG on sequence order and GCMRC work plan.</p> <p>The AHC recommends the TWG consider a comparison process where INs and MAs are compared in pairs, and the group decides, two at time, which comes first.</p> <p>Adjustments to workplans should be made annually, for a five-year plan.</p>

Comments on Vision Narrative
Received April 2001

	Comment	Response
Introduction		
110	Review of redlined comments from a small group that the full group did not review on the river.	All proposed redlined changes were accepted, as were the following modifications: paragraph 2, line 4 "The AMP seeks to achieve resource conditions within the CRE described below." paragraph 2, line 6 "... management actions that restore elements of natural patterns and processes, consistent with the ..." paragraph 1, line 6 "... recognize that GCD is an integral part of this ecosystem. Water and power are among the goods and services this ecosystem provides." paragraph 1, line 7 "... operation of GCD, and the introduction of non-native species, have altered the natural ..." paragraph 3, line 2 "... while retaining other valued components of the..." paragraph 3, line 3 "... such as the tailwater trout fishery..."
111	Paragraph 3, last sentence: The desired future resource conditions described below is a narrative of the AMP vision for what will result from <u>are the envisioned result of</u> successful implementation of the AMP strategic plan.	Concur.
Riparian		
112	The first paragraph is a definition and should be removed to the Glossary.	The AHC agrees with the approach adopted on the River, that the first part of each section is a definition. This fits with the idea that this may be a stand-alone document.
113	First paragraph, first sentence: Riparian resources are the natural elements of the ecosystem that are in a zone along the river and are influenced by river processes.	Concur.
114	paragraph 3: The natural communities native to the CRE dominate the riparian ecosystem. The lower band occurs in the scour zone and is a patchwork mosaic of sand beach, marsh, and tamarisk/willow communities. The upper band occurs above the scour zone (e.g., flood terraces, sand dunes, or talus slopes) and below desert vegetation. The	paragraph 3: The natural communities native to the CRE dominate the riparian ecosystem. The upper band occurs above the scour zone (e.g., flood terraces, sand dunes, or talus slopes) and below desert vegetation. The dominant species comprising the upper band may be hackberry, oak, Apache plume, catclaw acacia, mesquite, and

	<p>dominant species comprising the upper band may be Apache plume, catclaw acacia, oak, hackberry, and mesquite, as one proceeds down the river [Sonoran?]. The lower band occurs in the scour zone and is a patchwork mosaic of sand beach, marsh, and tamarisk/willow communities.</p>	<p>barrel cactus. The lower band occurs in the scour zone and is a patchwork mosaic of sand beach, marsh, and tamarisk/willow communities.</p> <p>paragraph 2, line 3: "... magnitude and duration. As one moves downstream, the species comprising these communities changes. Our vision is that..."</p>
115	<p>Last paragraph: Throughout these both communities, non-native species are not dominant and do not impair the abundance, composition, and distribution of the native communities, nor alter the natural processes that shape them.</p>	<p>Last paragraph: The AHC did not agree with these changes. There are more than two communities described here. The word native is not appropriate, as "native" refers to species, not communities.</p>
Cultural		
116	<p>The first 3.5 paragraphs are definition and should be removed to the Glossary.</p>	<p>The AHC agrees with the approach adopted on the River, that the first part of each section is a definition. This fits with the idea that this may be a stand-alone document.</p>
117	<p>Cultural – additional language "Traditional cultural resources include tangibles and intangibles, such as landscapes (including Glen and Grand Canyons Rim to Rim) and ethnobotanical resources, that have cultural and spiritual value to the tribes. These continue to be... and are integrated into their world view.</p> <p>Other groups have also forged special relationships with the CRE that span multiple generations (e.g., river runners, EuroAmerican pioneers, etc.).</p> <p>The continued existence of cultural resources is also important to other traditional users, and because they can inform all people about history.</p>	<p>First paragraph: Cultural resources are those resources of traditional, religious, and historic importance to Indian tribes and to the American people. They include, but are not limited to, archeological, historical, and traditional cultural resources. Cultural resources are important because their continued existence and use is integral to the cultural identity and existence of the Indian tribes that use or are connected with the CRE. <u>The continued existence of cultural resources is also important to other traditional users. Cultural resources can inform all people about history.</u> -Cultural resources are also important because they can inform all people about human history. [Insert sentence on other cultural groups.]</p> <p>Third paragraph: Traditional cultural resources include <u>tangibles and intangibles, such as are both tangible and intangible, and include landscapes (including Glen and Grand Canyons, rim to rim) and ethno-botanical resources that have cultural and spiritual value to the tribes. These continue to exist and are integrated into their worldview. Other groups have also forged special relationships with the CRE that span multiple generations (e.g., river runners and EuroAmerican pioneers).</u> [Insert sentence on other cultural groups.]</p>

118	<p>Paragraph 4</p> <p>Human-caused degradation of these places is prevented or stopped whenever possible. Therefore, Current and future generations can experience <u>historical, archeological, and traditional cultural resources</u> these places in the same way current <u>much as they existed in the past generations can.</u> Historical resources include Bridge Canyon camp, Lees Ferry, and the river gauge at Phantom Ranch. Archeological sites are ones such as Unkar Delta. These places are, in some cases, easy to access and enjoy, so visitors can develop a deep appreciation for the resources and their values. In others, access is restricted because of fragility or the sacred nature of the place.</p>	<p>Human-caused degradation of these places is prevented or stopped whenever possible. Current and future generations experience historical, archeological, and traditional cultural resources much as they existed in the past. Historical resources include Bridge Canyon camp, Lees Ferry, and the river gauge at Phantom Ranch. Unkar Delta is an example of an archeological resource.</p>
119	<p>paragraph 5</p> <p>Some places resources are stabilized or conserved for visitor enjoyment and education and for future generations, while, Others are purposefully left to the natural processes of erosion and sediment deposition. In some cases, these resources are easy to access and enjoy, so visitors can develop a deep appreciation for the cultural value of the resource. In other cases, access is restricted because of the fragile or sacred nature of the place. Between These two strategies, these are provide many other ways to manage these resources places are managed, in consultation with the affiliated tribes, including excavation to preserve the important information contained there. Another strategy is <u>and</u> development of an the oral history of the associated with each place in consultation with the affiliated tribes.</p>	<p>Some resources are stabilized or conserved for visitor enjoyment and education and for future generations. Others are purposefully left to the natural processes of erosion and sediment deposition. In some cases, these resources are easy to access and enjoy. In other cases, access is restricted because of the fragile or sacred nature of the place. Other strategies to manage these resources, in consultation with the affiliated tribes, include excavation to preserve the important information contained there and development of the oral history associated with each place.</p>
120	<p>paragraph 6</p> <p>In all cases, visitors have the <u>develop a deep appreciation for the resources and show proper respect</u> when visiting these places. Public outreach and education, including a living museum at Lees Ferry, is used to convey important cultural and spiritual values, including a living museum at Lees Ferry.</p>	<p>In all cases, visitors develop a deep appreciation for the resources and show proper respect when visiting these places. Public outreach and education, including a living museum at Lees Ferry, is used to convey important cultural and spiritual values.</p>
121	<p>paragraph 7</p> <p>Many people develop strong physical, spiritual, emotional, mental, and aesthetic ties to Glen and Grand Canyons. Even if visitors <u>may do</u> not understand the history or cultural richness of the place, their passage through the CRE cannot help but increases</p>	<p>Many people develop strong physical, spiritual, emotional, mental, and aesthetic ties to Glen and Grand Canyons. Even if visitors may not understand the history or cultural richness of the place, their passage through the CRE increases their</p>

	their appreciation for this international treasure and all its unique qualities.	appreciation for this international treasure.
Recreation		
122	<p>paragraph 2</p> <p>The CRE is remarkable in the length and breadth of its unbroken, primitive character. It provides unique opportunities for experiencing the natural sounds and natural quiet of the desert and river. Opportunities for solitude, connection to nature and personal contemplation outside the trappings of civilization, and fun are deeply valued. Visitors often learn humility, responsibility, and environmental stewardship.</p>	<p>The CRE is remarkable in the length and breadth of its unbroken, primitive character. It provides unique opportunities for experiencing the natural sounds and natural quiet of the desert and river. Opportunities for solitude, connection to nature, fun, and personal contemplation outside the trappings of civilization are deeply valued. Visitors often learn humility, responsibility, and environmental stewardship.</p>
123	<p>paragraph 4</p> <p>This vision and the Park's Colorado River Management Plans are consistent with each other. Opportunities for visitors to learn more about the human and natural history, cultural values, and scientific activities are easily accessible.</p>	<p>Opportunities for visitors to learn more about the human and natural history, cultural values, and scientific activities are easily accessible.</p>
Water and Power		
124	<p>paragraph 1</p> <p>Glen Canyon Dam and the power plant operate in a manner consistent with the law of the river, including the Grand Canyon Protection Act. The upper basin delivers water to the lower basin as required by compact.</p>	<p>In its entirety: <u>As part of the Colorado River Storage Project, Glen Canyon Dam produces renewable electricity and is an integral part of the electric supply grid for the western U.S. It provides necessary load following capacity to furnish electricity for homes, communities, businesses, and manufacturing.</u></p>
125	<p>paragraph 2</p> <p>Dam operations and other management actions result in recovery and long-term sustainability of downstream resources, while limiting hydropower capability and flexibility only to the extent necessary to achieve that recovery and long-term sustainability.</p>	<p>Glen Canyon Dam and the power plant operate in a manner consistent with the law of the river, including the Grand Canyon Protection Act. The upper basin delivers water to the lower basin as required by compact.</p> <p><u>The powerplant operates to maximize value of the power resource, consistent with the balancing of competing interests described in the EIS and ROD. Dam operations and other management actions result in recovery and long-term sustainability of downstream resources, while limiting hydropower capability and flexibility only to the extent necessary to achieve that recovery and long-term sustainability.</u></p> <p>As a result, power customers have the certainty of availability of that energy and capacity <u>will be available</u> from Glen Canyon Dam at a predictable cost.</p>

126	<p>paragraph 3 As a result, <u>the function and integrity of the CRE have been preserved and power customers have the certainty of available energy and capacity with necessary flexibility</u> from Glen Canyon Dam at a predictable cost.</p>	
127	<p>Substitute "Glen Canyon Dam and the powerplant operate in a manner consistent with the Law of the River including the Grand Canyon Protection Act. Upper Basin States deliver water to Lower Basin States as required by Compact. The powerplant operates to maximize value of the power resource consistent with resource balancing anticipated in the EIS, ROD, and the operating criteria established by the Secretary. As a result, power customers have certainty of availability of energy and capacity from Glen Canyon Dam at a predictable cost."</p>	