

CREDA
COMMENTS ON
DRAFT INFORMATION NEEDS
August 30, 2001

General Comments

1. We are concerned about the process used to develop the latest draft of the Management Objectives' Information Needs. On August 8-9, 2001 we attended a workshop to review and comment on a set of Information Needs. This resulted in a set of comments now tabulated and distributed. In addition, other comments made during round-table discussions ostensibly resolved questions or issues and, appropriately, did not need to appear in the latest draft. On this point, we discussed and resolved questions about Information Needs related to meeting Management Objective 10. This objective is to maintain or increase power production capacity and energy generation and increase where feasible and advisable. This MO and the associated goal does NOT mean the program seeks to reduce or decrease such capacity and energy generation or to determine impacts from such reductions. This matter was resolved at the workshop yet we find the same comments included again in the latest draft proposal. It is inappropriate and counterproductive to include language purportedly reflecting workshop consensus, when in fact it is contrary to what was discussed and resolved at the workshop. We experienced this to a certain degree as well during finalization of the Strategic Plan. We have to question the purpose of a two-day workshop if the resultant product does not accurately reflect the workshop discussions. To proceed in this manner will virtually assure that the I.N.s are not completed within the established time constraints.

2. We do not support the loose wording related to work in tributaries. (Pg. 4, M.O.1.3, 1.4, 1.5 and I.N.s.) In our mind, tributaries are a source of input to the CRE and monitoring and research related to their input may be appropriate in some instances. Wording in the revised M.O.s and I.N.s puts no limits on the research or monitoring that may be conducted. The revised M.O.s state we now wish to maintain or attain certain conditions within the tributaries and the I.N.s seek to determine conditions within the tributaries. These areas are outside the CRE and beyond the scope of this program. From this language, we would expect the AMP to next be conducting research and monitoring and investigating management of the upper watershed of the Little Colorado River, Kanab Creek, Paria River, or Havasu Creek. After all, how can we propose to maintain or attain conditions in tributaries without pursuing management actions within those watersheds? We should be looking at the influence these tributaries have on the CRE without proposing management or research on the tributaries for their own sake. Based on this, we suggest removing all reference to tributaries and replace with CRE when referring to areas where M.O.s or I.N.s apply.

3. The numbering system will need major revision. We trust I.N.s with revised numbers yet entirely deleted (strikethrough) will, in fact, be deleted and the number assigned to a new, sequential I.N.

Specific Comments

A. Pg. 10, M.O. 4.1. We suggest on line 2 insertion of the words "RBT free of" ahead of "whirling disease and other parasitic infections" and the whole phrase put at the end of the sentence.

B. Pg. 10, CMIN 4.1.2. Insert Proportional Stock Density for PSD as under RIN 4.1.1.

C. Pg. 11, CMIN 5.1.1. This should read: "What is the annual status and long-term population trend of KAS and their habitat at Vasey's Paradise?" This may preclude need for EIN 5.2.2.

D. Pg.12, RIN 5.1.5 Change "lost" to "loss."

E. Pg. 14, CMIN 6.2.1 and RIN 6.2. These appear to be the same I.N.. Determining the composition and extent of NHWZ vegetation changes on a 5-year schedule would seem to be the same as determining how NHWZ vegetation has changed on a 5 year scale.

F. Pg. 15, RIN 6.5.3 and IN 6.6 are identical.

G. Pg. 16, CMIN 6.7.2. This is a research I.N. and should be labeled as RIN 6.7.2. The I.N. asks a question for which research may be directed rather than asking, for instance, what is the annual change in food base that supports birds.

H. Pg. 16, RIN 6.7.1. The SWWFL should read SWWF to be consistent.

I. Pg. 17, RIN 6.7.3. This RIN may be best placed under Goal 6 ahead of M.O. 6.1 since it may have application to more than one M.O.

J. Pg. 17, CMIN 7.1. The note under this I.N. should be separated out as a RIN and reworded as follows: "What are the desired ranges of water temperatures for the CRE?" This change would allow deletion of LRIN 7.1.1.

K. Pg. 18, RIN 7.2.1, 2, and 3. Second sentence should read: "Where and how often?"

L. Pg. 18, Lake Powell. As we understand this tabulation, all but #1 should be listed as RINs and #1 should be listed as CMIN. This is not intended to reinitiate discussions about white-gray-black areas of responsibility at this point.

M. Pg. 20, M.O.s 8.2. The M.O. should read: "...distribution, within channel margins..."

N. Pg. 20, M.O.s 8.3. The M.O. should read: "...distribution, within eddies..." Also, the CMIN stage number should read 5,000 cfs.

O. Pg. 21, RIN 8.5.1. This should read: "What elements of ROD operations (upramp, downramp, maximum and minimum flow, HMF, BHBF) are most/least critical..." We need to know which ROD flows as defined are most important to maintaining sediment abundance on shore between 25,000 cfs and maximum dam releases. As presently worded, terms like "ROD" and "load following" used to describe "dam" operations mix various terms and do not provide the guidance needed to help us understand the importance of various aspects of the ROD flows.

P, Pg. 21, RIN 8.5.3. Delete "current" ahead of ROD as this implies there are other ROD flows to be concerned about or that changes to ROD flows are imminent.

Q, Pg. 21, EIN 8.5.1. This should read: "What relationships exist between the timing, frequency and magnitude of fine-sediment inputs and the timing, frequency and magnitude of ROD operations?" The HMF and BHBF are ROD flows so the sentence is confusing as written.

R. Pgs. 22, 23, CMIN 8.6.1, 2 and 3. These I.N.s are worded as data needed to address specific hypotheses and should be research I.N.s, not CMINs.

S. Pgs. 23-25. CMINs 9.1.3, 4 and 5; 9.2.1-6, 9.3.3, 9.4.2, 9.5.1, 3 and 4 are all worded as data needed to address specific hypotheses and should be research I.N.s, not CMINs. Also, CMIN 9.2.3 wording is not clear. Should this be "Are visitor capacities for these activities consistent with NPS management plans?"

T. Pg. 25, Under Goal 10 and ahead of M.O. 10.1 add the following I.N.: "What are the impacts to power users by the loss of capacity and energy at Glen Canyon Dam? What are the impacts to power users given the changes in operations under the ROD?" The assessment of economic impacts were clearly envisioned under the FEIS and ROD.

U. Pg. 25, RIN 10.1.1. As stated above under General Comments, this RIN should be revised. RIN 10.1.1 should read: "What are the effects on the CRE of increasing the daily fluctuation limit." The information is needed to know the effect of such an increase on the CRE. As presently written, we are left in the dark as to what effects we are supposed to measure. The draft proposal does not achieve the M.O. or Goal 10. DECREASING the daily fluctuation limit, as proposed, does not need to be studied as to its potential to maintain or increase power because it will do neither.

V. Pg. 25, RIN 10.1.2 should read: "What are the effects on the CRE of increasing the upramp and downramp limit?" The information is needed to know the effect of such an increase on the CRE. As presently written, it is unclear what effects are supposed to be measured. The draft proposal does not achieve the M.O. or the Goal which is to maintain and increase, where feasible, the power production capacity and energy generation. DECREASING the up- or down ramp rate, as proposed, does not need to be studied as to its potential to maintain or increase power because it will do neither.

W. Pg. 25, RIN 10.1.3 should read: "What are the effects on the CRE of raising the maximum flow limit above 25,000 cfs?" The information is needed to know the effect of such an increase on the CRE. As presently written, we are left in the dark as to what effects we are supposed to measure. Again, the draft proposal does not achieve the M.O. or Goal 10. LOWERING the maximum flow limit, as proposed, does not need to be studied as to its potential to maintain or increase power because it will do neither.

X. Pg. 26, RIN 10.1.4 should read: "What are the effects on the CRE of lowering the minimum flow limit below 5,000 cfs?" The information is needed to know the effect of such a decrease on the CRE. Again, it is not clear what effects are supposed to be measured. The draft proposal does not achieve the M.O. or Goal 10. RAISING the minimum flow limit, as proposed, does not need to be studied as to its potential to maintain or increase power because it will do neither.

Y. Pg. 26, RIN 10.4.1 should read: "What are the effects on the CRE of increasing Automatic Generation Control?" The information is needed to know the effect of such an increase on the CRE. As presently written, it is not clear what effects are supposed to be measured. The draft proposal does not achieve the M.O. or Goal 10. DECREASING the AGC, as proposed, does not need to be studied as to its potential to maintain or increase power because it will do neither.

Z. Pg. 27, RIN 11.1.3. Replace "dam" with "ROD" throughout the I.N.s. As discussed most recently during Strategic Plan drafting, the purpose of the program is to understand the effects of ROD operations on the CRE as required in the FEIS. Throughout the M.O.s and I.N.s we have stressed the need to monitor ROD operations first to establish a baseline understanding of effects before recommending further changes to operations.

a. Pg. 27, CMIN 11.1.6a. This I.N. is worded as a research I.N. since it suggests a need to collect data to answer a specific hypothesis.

b. Pg. 28, CMIN 11.2.2 and 11.2.5 are also worded as research I.N.s and should be relabeled.

c. Pg. 28, CMIN 11.2.4. Perhaps this should be moved to Goal 12 under M.O. 12.2.