

David Nickum
Executive Director
Colorado Trout Unlimited



January 16, 2008

Ms. Carol DeAngelis
Mr. Ed Warner
US Bureau of Reclamation
2764 Compass Drive
Grand Junction CO 81506-8744
Via Email: ewarner@uc.usbr.gov

Dear Mr. Warner:

On behalf of the Board of Directors of Colorado Trout Unlimited, I write to urge the Bureau to immediately reduce its releases from the Aspinall Unit, so as to hold back more water in order to provide a much-needed flushing flow through the Black Canyon and Gunnison Gorge this Spring.

CTU's members are involved regularly both in fishing and with conservation activities within the Gunnison Gorge. Over recent years, the lack of adequate flushing flows has allowed sediment to accumulate, as well as encouraging more algae and plant growth within the stream channel. These unnatural conditions are already having adverse effects on the world-renowned fishing opportunities within the Gunnison Gorge, and if continued, will begin to impair fish populations as habitat becomes silted in and overgrown.

A number of scientists have looked at flow levels required to "flush" the Gunnison River through the Canyon and Gorge, and the Department of the Interior has previously suggested that flows of 2,500-3,500 cfs (or more) are needed to effectively mobilize gravels and cobbles within the low flow channel and adjacent low flow banks (greater flows are needed to mobilize materials on lateral gravel bars and debris flow deposits). The Gunnison River has not enjoyed a flushing flow of that magnitude since 1999. According to recent reports, snowpack in the Gunnison Basin is at 143 percent of normal, and indeed, your agency recently increased releases by 300 cfs in order to open storage space for the anticipated large runoff. Given the great need for flushing flows, we believe that the current conditions offer a tremendous opportunity for the Bureau to store additional water – now – in order to make a larger peak flow release in Spring. If drought conditions resume, this opportunity may not present itself for years to come, and it would be a grave disservice to the river environment and its aquatic life if the Bureau does not avail itself of this opportunity to flush the accumulated sediment.

Even modest adjustments could provide sufficient water for flushing purposes. For example, reducing releases from 1400 back to 1200 cfs through April would result in enough additional water in storage to provide more than five days of 4000 cfs flushing flows. Even with that reduction, we note that 1200 cfs is a higher release for hydropower production than the 30-year average for the period January through April.

The timing and duration of flushing flows, as well as the ramping of flows up and down from a peak flow, can have significant impacts for fisheries – for example, impacting the recruitment of young trout that emerge from the gravel during a peak flow period. Given recent strong brown

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trout recruitment, even if a flushing flow led to some decline in 2008 brown trout recruitment, the benefit of improving habitat conditions in the Gorge would justify the action – not every year must be a strong year class in order to maintain a high-quality fishery. In contrast, the Colorado Division of Wildlife (CDOW) is working to re-establish rainbow trout populations that have been decimated by whirling disease. Accordingly, we would recommend that timing of a flushing flow occur in May, during brown trout emergence – rather than in June, during rainbow trout emergence. This would also align more closely with North Fork peak flows and maximize benefits for downstream native fishes. In order to protect fishery resources, the peak should also be managed according to the ramping rate guidelines developed by CDOW. The exact operations of a 2008 flushing flow should be developed in careful consultation with CDOW.

We recognize that a shift of this kind would result in reduced hydropower generation, insofar as releases over 2000 cfs made during a flush rather than released over the next three and a half months would not be run through the turbines. However, habitat in the Gunnison Gorge is choked with sediment from the past eight years of managing for optimal hydropower production without consideration of the need for flushing flows. A 2008 flushing flow would help restore a more reasonable balance on Aspinall operations and is, frankly, long overdue. If conditions by mid-March provide high confidence that greater hydropower releases can be made while still attaining an adequate flushing flow, operations could be adjusted at that time.

We would appreciate the opportunity to talk with you about the potential for prompt operational changes, and also ask that you to bring this proposal forward at the upcoming Aspinall Operations Meeting. Please contact our counsel with the Colorado Water Project, Drew Peternell, at 303-440-2937 x102 to see if a meeting by phone or in person can be arranged.

Thank you for your consideration.

Sincerely,

David Nickum