

Truchas Chapter of Trout Unlimited

P.O. Box 31671
Santa Fe, NM 87594

December 3, 2002

Mr. Ken Beck
U.S. Bureau of Reclamation
Western Colorado Area Office
835 East Second Avenue, Suite 400
Durango, CO 81301
Via email: kbeck@uc.usbr.gov

Re: Draft Environmental Impact Statement Navajo Reservoir Operations

Dear Mr. Beck:

The Truchas Chapter of Trout Unlimited requests that the Bureau of Reclamation consider the following comments as it makes a decision on Navajo Dam and Reservoir operations. The Truchas Chapter represents 450 anglers in northern New Mexico, including the areas in and around Navajo Dam. Statewide, Trout Unlimited has over 1,000 members, many of whom are recreational users of the San Juan River and Navajo Reservoir.

Since it's inception, Truchas Chapter's main focus has been the survival of the Rio Grande Cutthroat trout. While not listed, it is certainly imperiled, so we understand the issues surrounding fish population recovery and stabilization.

Low Flow Impact

In reviewing the data, the 250/5000 alternative is presented as the preferred alternative because it meets best the Flow Recommendations criteria (DEIS Table II-3), while the 500/5000 alternative does not. A point needs to be made though, that in the *Flow Recommendations for the San Juan River (May 1999)*, there are four "primary criteria" (FRSJR 8-3). The 500/5000 alternative does meet 2 of the 4 primary criteria, reaching flows >10,000cfs for 5 days in 20% of years, and reaching flows >2,500cfs for 10 days in 80% of years. It also effectively meets the criteria of flows >8,000 for 10 days in "one of three years" at 29.2% of years (off by only 1 year in 25).

We also have to wonder if the 29.2% listed in the cell for >8000 for 10 days flows is indeed correct. Comparing the No Action and 500/5000 alternative in performance under the >8000 flow, the 500/5000 performs significantly better for every time duration except the primary 10 days duration. That this is the case defies logic. In fact, the 500/5000 alternative performs better than the No Action alternative at every flow and every duration under 30 days, with the exception of this one data point.

Where the 500/5000 alternative misses is in meeting the criteria of providing flows >5000cfs for 20 days (50% vs. 40%, or 1 year in 10). It also misses in terms of maximum duration between events. Though again, it seems illogical that it would perform worse than the No Action alternative when it comes to providing 7,760cfs flows for 10 days. Could this also be an indicator of a problem with the data at >8000cfs flows?

It seems that meeting the primary criteria and maximum duration between events could be accomplished in a way that imposes less economic impact than what is proposed.

The data for other flow regimes, most notably the 250 Variable/5000 are not presented. We would be very interested to see how this alternative rates on these primary criteria. A flow regime with lower winter flows and higher summer flows would mimic the natural flow of the river (pre-dam) better than a plan that is purely based on running at 250cfs year round except for spring flushes.

Historically, summer flows on the streams in the San Juan drainage are typically twice as high as winter flows. The following data is from the USGS website, Surface Water Data for USA: Monthly Streamflow Statistics, and shows historical streamflow by month for 3 of the free-flowing feeder streams to Navajo Reservoir:

<u>River</u>	<u>Gage Location</u>	<u>Years</u>	<u>Monthly Mean Streamflow, in ft³/sec.</u>											
			<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
San Juan	Pagosa Spr, CO	1935-2001	55.7	62.5	150	562	1293	1334	395	185	153	147	95.1	64.8
Piedra	Arboles, CO	1962-2001	75.8	93.9	326	882	1310	1046	345	230	211	176	129	91.6
Navajo	Chromo, CO	1936-1995	28.2	29.4	43.6	139	331	380	139	69.8	53.5	50	37.7	30.8

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From this data, it is apparent that streamflows are typically twice as high in the summer months (July - September) as they are in the winter (December – February). We understand that the winter low flow test that was conducted showed little impact to the trout fishery below Navajo Dam, but also that the shortened summer low flow test was inconclusive at best. This data makes it all the more disturbing that the 250 Variable/5000 alternative was dismissed so casually. Because the 500/5000 alternative is so close to meeting the primary criteria as laid out in the Flow Recommendations, we believe that some small adjustments to winter flows would probably make up the difference in water needed to meet the primary criteria and maximum duration criteria.

Also of concern is that the entire focus seems to center around the peak or flushing flows. There is little discussion of the effects of lower flows during the summer months limiting the amount of available habitat for native fish both below and above Farmington.

Economic Impact

The DEIS makes mention of economic impacts to both the fishing and rafting industries, but little monetary data is presented. Using the figures in the DEIS, if outfitters lose 50% of guided float trips due to low flows (DEIS III-70), which total 6000-7000 trips per year (DEIS III-64), the bulk of which are during the affected period, the economic impact would be a loss of \$500,000 to \$750,000 annually at \$250 per angler.

Long term, the impact will certainly force many of the outfitters out of business. This impact would also be felt on the hotels, restaurants, resorts, rental properties, and retail fly fishing shops in the area. Adding these figures in, it is not unreasonable to estimate that the overall loss of income to the community of Navajo Dam would surpass \$1 million per year, and would impact numerous jobs. We have no idea what the impact on the rafting industry would be, but it too would probably be significant.

Recommendation

As it stands, we would recommend the 500/5000 alternative, but it is apparent from the DEIS that this option has already been dismissed in the minds of the authors. This document reads more like advertisement than an unbiased EIS.

Also, we are disturbed at the lack of viable options, which also stacks the deck in favor of the preferred alternative. Because the focus of those studying the survival of native fishes downstream is based mostly on flushing flows and not base flows, we are sure that most with expertise in this area will provide comments in favor of the preferred alternative. We too are concerned about the survival of native fishes, but this DEIS however dismisses the economic value of the San Juan River to the local communities.

While it may appear to most not in tune with the fishing/rafting industries that the difference between 250cfs and 500cfs base flow may be small, to those that understand the river, that difference will cost many their livelihoods. It is our sincerest hope that the Bureau of Reclamation will reconsider the narrow scope of alternatives offered and make a better effort to avoid severely damaging the local community in such an important decision. We believe that this can be accomplished with minor changes to the alternatives, which should have no significant impact on the overall plan, native fishes, or water development.

If you have any questions or comments, please feel free to contact me at (505) 422-2286.

Sincerely,

William Schudlich
President
Truchas Chapter of Trout Unlimited