PROPOSED MITIGATION TABLE
Attachment B
Trout Unlimited's Final EIS Comments Letter
Dated January 31,, 2011

Measure	Final EIS Mitigation	TU's Proposed Mitigation	Rationale
Temperature	**Acute standards violations:** Reduce or curtail all Windy Gap diversions ***after July 15*** if stream temperature in the Colorado below Windy Gap Dam is within 1°C of acute state standard; not implemented if no causal relationship between flow reduction and temp benefits	**Acute standards violations:** Reduce or curtail all Windy Gap diversions whenever stream temperature in the Colorado below Windy Gap Dam is w/n 1°C of acute state standard Adequate monitoring and early warning systems needed to ensure standards are not violated shall be included in the Monitoring and Adaptive Management Plan	**Acute standards violations:** State stream temperature standard violations must be avoided whenever they occur not after an arbitrary starting date. An appropriate start date for stream temperature monitoring obligations could be established under the monitoring and adaptive management plan (see below). Demonstration of causal relationship is inconsistent with 404(b)(1) regulations which provide project may not cause ***or contribute to*** violation of standards
	Chronic standards violations: Reduce or curtail diversions if stream temperature exceeds chronic state standard but only if Northern determines that Granby is likely to spill	**Chronic standards violations:** Reduce or curtail all Windy Gap diversions whenever stream temperature in the Colorado below Windy Gap Dam is expected to exceed chronic state standards based on weekly average temperature (WAT) calculations	**Chronic standards violations:** State stream temperature standard violations must be avoided, be it acute or chronic. Limiting mitigation to times when project operator predicts a spill is arbitrary and capricious, particularly as there WGFP operation is not ***restricted*** to times when Granby spills
Peak Flows	Existing flushing flow requirements increased from 450 cfs to 600 cfs In any year when flows below	Restrict or curtail Windy Gap diversions whenever flushing and channel maintenance flows approved under the monitoring and adaptive management plan are not	Flushing and channel maintenance flows are critical components of stream and aquatic life health. Site specific study by the Colorado Division of

	Windy Gap have not exceed 600 cfs for at least 50 consecutive hours in the previous two years, and total Subdistrict water supplies in Chimney Hollow and Granby Reservoirs exceed 60,000 AF on April 1, the Subdistrict will cease all Windy Gap pumping for at least 50 consecutive hours to enhance peak flows below Windy Gap	met	Parks and Wildlife (Nehring 2011) concludes that reduction of peak flows is degrading aquatic life conditions and that further reduction of peak flows will result in further degradation; the study finds that minimum peak flows of 1000 cfs for several weeks are needed The Final EIS fails to properly evaluate peak flow (flushing and channel maintenance) needs
Windy Gap Reservoir Bypass	None	Develop and implement a bypass channel or similar modification to bypass river flows around Windy Gap Reservoir while allowing the Reservoir to operate off-channel	Site specific study by the Colorado Division of Parks and Wildlife (Nehring 2011) identifies Windy Gap Reservoir as a major cause for existing degradation of aquatic life in the Colorado River and that a Windy Gap bypass is critical to the success of any mitigation
Monitoring & Adaptive Management	None specifically proposed in the Final EIS Final EIS (p. 3-339) states: "Reclamation will be responsible for enforcing the monitoring and mitigation measures that are finalized in the ROD. In the event that identified mitigation measures are unsuccessful in reducing or avoiding resource impacts as anticipated, Reclamation would coordinate with the Subdistrict and other appropriate entities to determine what steps should be taken to correct any deficiencies in the planned mitigation or develop	Develop and implement a monitoring and adaptive management plan for the express purpose to monitor, prevent and respond to negative changes in trout and other aquatic life in the Colorado River from the outlet of Granby Reservoir to Gore Canyon Plan to be proposed by the Subdistrict for approval by BOR and USACE prior to final contract approval and issuance of 404 permit after reasonable public notice and an opportunity for public comment At a minimum, the monitoring plan shall include: - monitoring necessary for the	Available information is insufficient to fully assess impacts The concept of monitoring and adaptive management is already contemplated in the Final EIS but the mitigation measure is meaningless unless its purpose and minimum requirements are specified. Plan must be approved by the federal agencies after public notice and opportunity for comment.

	alternative methods to achieve mitigation objectives."	development of flushing flow and channel maintenance flow targets - biologic monitoring to evaluate changes in fish, aquatic invertebrate and aquatic plant populations - water temperature and stream flow gauging stations sufficient to monitor changes in water quality and water quantity in the Colorado River - sufficient stream transects to monitor and evaluate future changes in ecological condition associated with changes in channel maintenance and flushing flows At a minimum, the adaptive management plan shall include: - baseline of existing hydrological alterations before WGFP - baseline of existing ecological conditions (existing fishery and fish biomass, aquatic macroinvertebrate and channel geometry data) - establish key indicators of aquatic life and stream health (e.g., fish biomass) and threshold levels that reflect declines in aquatic life and stream health - requirement to implement actions to prevent further decline and restore aquatic life and stream health - a process to inform and involve stakeholders in the monitoring and adaptive management process	
