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Jayne Harkins
Bureau of Reclamation
Lower Colorado Region
P.O. Box 61470
Boulder City NV 89006-1470

**RE: COMMENTS ON REVIEW OF EXISTING COORDINATED LONG-RANGE
OPERATING CRITERIA FOR RIVER RESERVOIRS**

December 6, 2004

Dear Ms. Harkins:

The Grand Canyon Protection Act (GCPA) requires the Secretary of the Interior to "operate Glen Canyon Dam . . . in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established." This requirement in the GCPA to operate Glen Canyon Dam for the benefit of park resources adds a new project purpose to dam operations. Consistent with this addition to the law, we suggest that the following changes be made to the Long Range Operating Criteria:

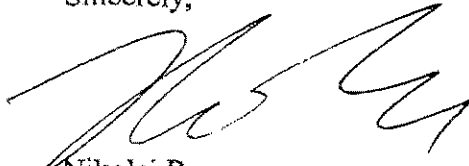
1. In Article 1(2), after the word, "recreation," add the phrase, "protection of Grand Canyon National Park and Glen Canyon National Recreation Area."
2. Add the following paragraph as Article II(6):

In the application of Article II, Glen Canyon Dam will be operated and releases from Lake Powell made in accordance with the Grand Canyon Protection Act in order to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established. Annual releases will be made through the powerplant to the extent practicable except when above-powerplant releases are determined by the Secretary to be necessary to meet the provisions of the Grand Canyon Protection Act. Water releases pursuant to this paragraph will not affect allocations of water secured to the Colorado River Basin States by any compact, law, or decree.

3. In Section IV(1)(a), after the phrase, "power and energy," add the phrase, "and protection of natural and cultural resources in Grand Canyon National Park and Glen Canyon Recreation Area."

Thank you for inviting public comments on the review of the Long Range Operating Criteria and for considering our comments.

Sincerely,



Nikolai Ramsey
Director of Water Policy
Grand Canyon Trust

Cc:

Tom Ryan
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