



CREDA

Colorado River Energy Distributors Association

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts
Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

Intermountain Rural Electric Association

Platte River Power Authority

Tri-State Generation & Transmission
Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric
Association, Inc.

NEVADA

Colorado River Commission
of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

City of Truth or Consequences

UTAH

City of Provo

City of St. George

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

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November 30, 2010

Mr. Tom Chart
Via email only

RE: Aspinall Study Plan – November 15 Comments Version

Dear Tom:

Thank you for the opportunity afforded CREDA to participate in the discussions on the above referenced Study Plan. We offer comments and suggested revisions for your consideration following the November 15 webinar. We understand the Study Plan will be provided to the Management Committee for review, but wanted to offer these comments as soon as possible.

1) The introduction and text should clarify that Reclamation must approve of any proposed change of operations at Aspinall as a result of what is learned from the study process, and such changes must be accomplished consistent with the authorized purposes of the CRSP. You may also consider incorporating reference to the Aspinall Work Group process in this Plan.

2) Page 9, Para. 4-the Gunnison River is only a small fraction of the habitat (roughly 2%) of the listed fish. No changes in operations in the Gunnison would ever be sufficient to "attain" recovery.

3) Page 24, Examination of ramping rates should be given a high priority; spring flows that are timed coincident with the Black Canyon water right and settlement should be given a high priority.

4) Page 34, suggest emphasizing the statement that "most pressing uncertainty associated with these flow recommendations is whether the durations identified in McAda 2003 are necessary ." We disagree with the proposed rewording of this section as discussed November 15, as it may be considered pre-decisional and is inappropriate for this document.

It is clear your office has put a lot of time and effort into this Plan. Please advise when the next ad hoc discussion will be held. Thank you for considering these comments.

Sincerely,

/s/ Leslie James

Leslie James
Executive Director
Cc: Kent Holsinger
Carol Ballantine - PRPA