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Reclamation 2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region
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BlueRibbon Coalition is writing to provide feedback for the Supplementary Environmental Impact Statement for short term management of the Colorado River. BRC is a national non-profit organization that promotes responsible recreation and encourages a strong ethical dialogue and individual stewardship of our natural resources. We champion responsible use of public lands and waters by all recreationists through education of their responsibilities and the empowerment of our members to secure, protect, and expand shared outdoor recreation access. We are proud to work collaboratively with governments, natural resource managers and other recreationist groups.

We represent tens of thousands of Lake Powell and Lake Mead recreation users. Glen Canyon National Recreation Area is a significant national treasure as well as a spectacular producer of revenue. In order to keep water flowing to the Lower Basin users Lake Powell has depleted its storage of water and the level of the lake has dropped to the point that it has at times precluded any recreational (economic) activity on its north end. This began December 2, 2021 and continues to this point in time with only limited operational capabilities. During periods of 2021-2023, its south end was compromised to the point that recreational utilization, and its

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attendant revenue, almost vanished. While we recognize the importance of water deliveries and hydroelectric power generation, it is important to recognize the economic benefits of recreation use of these waters is comparable to the economic benefits of the other uses and vitally important to the communities that rely on these benefits. The negative impacts of lost recreation access disproportionately impact Navajo Nation tribal communities on the southern border of the GCNRA, as well as Page, Arizona. BRC supports Alternative 2, the Lower Division Proposal. This alternative is the only option that aligns with President Biden's Investing in America Agenda and supports the Colorado River Basin and its users. We applaud BOR for adopting this alternative as the proposed alternative. Conserving water is the common sense plan that benefits all users of the Colorado River.

The proposed operational tiers in the proposed action will position the agency to have more operational flexibility when dealing with changed circumstances since the adoption of the 2007 Interim Guidelines. The agency recognizes that "Hydrologic uncertainty combined with uncertain future growth and water use compound to mean that it is impossible to assign probabilities to any given future and the basin is experiencing conditions of deep uncertainty." While our approach is focused on recreation, we also believe it provides a meaningful framework for analyzing risk and employing planning methods that account for deep uncertainty.

As non-consumptive users, our rights will not interfere with any of the other users of Colorado River water. For 60 years Lake Powell has stood as the guardian and fulfilled its role as a management tool for adequate Basin State water allocation. It is now time to rethink those original policies and include other stakeholders in future policy considerations.

We feel that recreationists have a right to access and use stored water. So do the states of Colorado, Utah, and Arizona. As a natural resource, water is to be used for the benefit of all of us. It is in the public interest to allow recreational use of our natural resources that leads to no adverse effect or depletion of those assets. Colorado River water belongs to us all and we encourage any move in a direction that enables the benefits of this water to be enjoyed by the greatest number of users.

The key challenge that faces future planning is that there will likely be declining water supply because of climate change in a watershed that was already over allocated to begin with. The seven states have recognized this, but the specific challenge will be to modify existing agreements to reduce water demand within the lower basin states while allowing the upper basin states to exercise their water rights so that all seven states and Mexico can sustainably use this resource while preserving other key values related to recreation and the environment.

2007 Interim Guidelines

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The first component of the 2007 Interim Guidelines is,

“improve Reclamation's management of the Colorado River by considering trade-offs between the frequency and magnitude of reductions of water deliveries, and considering the effects on water storage in Lake Powell and Lake Mead, and on water supply, power production, recreation, and other environmental resources;

The 2020 review of the 2007 plan found that the BOR was “largely effective”. BlueRibbon believes that in the case of recreation, BOR was not effective as we have seen recreational resources such as marinas and ramps closed due to water levels. There have been “experimental releases” that should not be implemented during times of drought.

Economic Considerations

BOR should analyze the full impact of recreation opportunities with releases and experimental flows. When developing future plans potential economic loss needs to be considered. In 2022 GCNRA economic output was \$372,677,000.¹ That is more than \$7 million per week. Lake Mead's economic output was \$343,000,000 which is \$6.5 million per week. The Bureau of Reclamation needs to consider the full impact of water levels and releases on the economy when selecting an alternative and making a decision. Not cutting 3maf would greatly harm not only local economies but would have a ripple effect in the nation's economy. Releases that cause lake levels to drop for an extra week or two cost local communities millions of dollars. Its economic multiplier is 10, giving rise to over \$4 billion in direct economic value to its surrounding and regional areas. The low water years at Lake Powell and Lake Mead were nothing short of a wipeout that cost their local economies over \$300 million in two years. We now know that the low-water levels cost the area surrounding Lake Powell and Lake Mead hundreds of millions of dollars in direct economic benefit. In 2022, Glen Canyon NRA showed a \$207 million dollar decline. Lake Mead also saw a \$114 million dollar decline in 2022. Those numbers are big enough they should be factored into this decision.

In 2019 both GCNRA and Lake Mead generated more economic output confirming that higher water levels support economies. GCNRA and Lake Mead alone provide over 6,000 jobs. According to the Bureau of Economic Analysis, outdoor recreation boosted the economy by \$1.08 trillion in 2022.² “Boating/fishing was the second-largest conventional activity for the nation at \$32.4 billion”

1

<https://www.nps.gov/orgs/1207/national-park-visitation-sets-new-record-as-economic-engines.htm#:~:text=WASHINGTON%2C%20D.C.%20%2D%20The%20Department%20of,economy%20and%20supported%20378%2C400%20jobs.>

² <https://www.bea.gov/sites/default/files/2023-11/orsa1123.pdf>

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Conclusion

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non motorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'B B' followed by a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin' in a cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition