



PO Box 1934
Flagstaff, AZ 86002
(928) 773-1075
info@gcrg.org
www.gcrg.org

To: CRinterimops@usbr.gov

Reclamation 2007 Interim Guidelines SEIS Project Manager,
Upper Colorado Basin Region

Re: Grand Canyon River Guides' (GCRG) Comments on the Revised Draft Supplemental EIS (SEIS)
for Near Term Colorado River Operations

Date: December 11, 2023

To whom it may concern,

Grand Canyon River Guides' comments regarding the revised draft Supplemental EIS (SEIS) for Near Term Colorado River Operations, are summarized below for consideration by the Bureau of Reclamation (BOR). This revised draft SEIS is a supplement to Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead, referred to as the 2007 Interim Guidelines.

GCRG recognizes that this revised SEIS to the original draft SEIS issued April 14, 2023 is in response to two principal changes from the original analysis: improved hydrology and a proposal for a new alternative based on the Seven States Letter.

First, hydrology in the Colorado River Basin has improved compared with the hydrology at the time the SEIS analysis began in December 2022. Analysis in the original draft SEIS was based on hydrology from September 2022. Using the September 2022 hydrology, the percent of traces reaching critical elevations at Lake Powell (i.e., below 3,490 feet) through 2026 was 57%, and the percent of traces reaching critical elevations at Lake Mead (i.e., below 1,000 feet) was 52% without additional action. With improved hydrology from June 2023, the percent of traces declining below critical elevations is 8% at Lake Powell and 4% at Lake Mead through 2026.

Second, in May 2023, after the original draft SEIS was issued, the Lower Division States proposed an alternative for approximately 3 million acre-feet of water to be conserved to protect critical levels at Lake Mead ("Lower Division Proposal") ([Lower Basin Plan Letter](#) - May 22, 2023). The Upper Division States recommended that this proposed alternative be analyzed in the NEPA process ([Seven States Letter](#) - May 22, 2023). After the Lower Division Proposal was submitted, Reclamation temporarily withdrew the original draft SEIS so that it could fully analyze the effects of the proposal under the NEPA.

As a starting point, the BOR must consider its obligations under the Grand Canyon Protection Act (GCPA) and to the maximum extent possible demonstrate how each alternative being considered in the SEIS meets these legal obligations. Specifically, the key mandate of the Grand Canyon Protection Act of 1992 states, *"The Secretary shall 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, including, but not limited to natural and cultural resources and visitor use."* (Section 1802, GCPA). **Indeed, GCRG and the broader public view the Colorado River through Grand Canyon National Park, not as a pipeline between two reservoirs, but as a sacred place and living river with complex and interrelated resources and associated values that must be protected in perpetuity.**

Legal responsibilities through the Endangered Species Act (ESA) are also paramount. An increase in smallmouth bass and other predatory nonnative fish passing through Glen Canyon Dam, along with warmer water temperatures sufficient for these species to reproduce are a *clear and present danger* to the federally listed humpback chub. The establishment of these warm water non-native fish invaders could permanently shift Grand Canyon's aquatic ecosystem away from the fish assemblage typical of the last 50 years. (Schmidt, Yackulic and Kuhn, 2023). Due consideration must be made to keeping Lake Powell above the 3525' threshold to minimize pass-through and reduce warming of the river below Glen Canyon Dam. Please note that warmer water temperatures can also threaten the viability of the recreational rainbow trout fishery in the Glen Canyon reach.

This SEIS must also assess the potential impacts of the proposed action to the goals and objectives of the Long Term Experimental and Management Plan (LTEMP) which provides the framework for adaptively managing Glen Canyon Dam operations, as well as the Colorado River Management Plan (CRMP), the complex visitor use management plan for the Colorado River corridor in Grand Canyon. Any reduction in annual release volume as well as monthly flow levels would have significant implications for both of these management plans, and for the environmental, cultural, and recreational resources that they are designed to protect.

Additionally, as longstanding river stakeholder charged with protecting the Colorado River experience over the long term, and on behalf of our diverse constituency of river guides, outfitters, commercial passengers, private boaters, and other Grand Canyon aficionados, GCRG is adamant that BOR must reconsider the lowest flows that can be safely navigated, given the

inherent risks of river running, in different types of craft, especially large motor boats which enable under-served segments of the public to experience Grand Canyon. This SEIS states that under both the No Action and Proposed Action alternatives *"daytime flows will not drop lower than the safe whitewater boating threshold of 5,000 cfs."* (SEIS Page 3-237). GCRG contends that 5,000 cfs is NOT a safe whitewater boating threshold -- this was made abundantly clear after the mayhem that ensued from the BOR's sudden reduction of flows to 5,000 cfs in September 2023. Serious impacts included (but were not limited to):

- injuries ranging from minor to major (some *very serious*),
- numerous evacuations, some with long wait times as there were too many evacuations happening at one time.
- replacement guides flown in, to take over for those who had been injured.
- boat and equipment damage, including on-river repairs and motor shortages
- negative impacts to the river experience for clients,
- significant challenges for the National Park Service, as SAR resources were stretched thin
- economic ramifications for outfitters, etc...

To better illustrate these impacts, we offer this harrowing account of the cascade of alarming consequences surrounding a guide evacuation in the lower canyon at extremely low water this September:

"The guide went over the lower center right pour-over on the second to the last day of the super low, low flows, at 205 Mile Rapid. He was thrown into his oar tower, ribs first, and said it was the worst pain he had ever been in. Couldn't stand, couldn't walk, could barely breathe. The helicopter took four hours to get there because they were in the midst of six other evacuations. We had to camp at Pumpkin Springs on the last night of the river trip and row out in the dark to make takeout time. We didn't make it. Passengers got on the bus and left as soon as we got there. Derigged a whole trip with just five remaining guides."

Thankfully, that injured guide is ok now, however this scenario is but a snapshot of the widespread drama that was a direct consequence of the 5,000 cfs low flow – a water level not seen nor experienced by most guides working in Grand Canyon today. Thankfully, after serious concerns were raised by the NPS and the commercial river outfitters, Reclamation raised the low water threshold to 6,000 cfs till the end of the motor season, which helped considerably. Again, 5,000 cfs low flows should not be considered a safe whitewater threshold, and this SEIS must be adjusted accordingly.

Furthermore, this public safety issue was exacerbated by NO NOTICE of the change in flows – people already on the river in Grand Canyon were completely unaware of (and unprepared for) what was happening. We find this completely unacceptable. The Bureau of Reclamation must commit to providing a **minimum of 2 weeks advance notice** of any reduction in flow levels to the NPS and to the river running public. Again, the Colorado River through Grand Canyon is not a pipeline – safety for river users below Glen Canyon Dam must always be carefully considered

by the Bureau of Reclamation. Better communication between the Bureau, the NPS, and river stakeholders will always result in better outcomes.

In closing, GCRG would like to refer you to our previously submitted official comments, as there is significant overlap for this SEIS:

- [GCRG scoping comments for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead](#)
- [GCRG scoping comments on SEIS for the Glen Canyon Dam Long Term Experimental and Management Plan](#)
- [GCRG comments on the Smallmouth Bass Flow Options EA](#)

We thank you for this opportunity to provide comments on the Supplemental EIS for Near Term Colorado River Operations as it attempts to address the mega-drought, historically low reservoir levels and low runoff conditions, all exacerbated by the imbalance between supply and demand. If you have any questions, or if we can be of assistance, please let us know.

Respectfully,

Lynn Hamilton, Executive Director, Grand Canyon River Guides, Inc.

David Brown, Adaptive Management Work Group representative

Ben Reeder, Technical Work Group representative