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Genevieve Johnson
Bureau of Reclamation 2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region,
125 South State Street, Suite 8100
Salt Lake City, Utah 84138
Transmitted via email to CRinterimops@usbr.gov

American Whitewater comments on the Bureau of Reclamation's Revised Draft Supplemental Environmental Impact Statement for Near-Term Colorado River Operations

Dear Camille Touton,

American Whitewater appreciates the opportunity to provide written comments on the Revised Draft Supplemental Environmental Impact Statement (Revised Draft SEIS) for Near-Term Colorado River Operations.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 80,000 supporters, 7,000 dues-paying members, and 80 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

American Whitewater is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and we have members that live, recreate, and depend on the outdoor economy of the Colorado River Basin. American Whitewater and our members are invested in ensuring that management of the Colorado River Basin is informed by science, traditional ecological knowledge, robust public participation, and that the ecological and recreational values of the Colorado River Basin are adequately included in near-term Colorado river planning, modeling, and operations.

The Revised Draft SEIS includes just two alternatives, the No Action Alternative and the Lower Basin Proposal as the Proposed Action Alternative. American Whitewater supports the proposed action alternative with the following considerations.



Comments on Proposed Alternative

American Whitewater is encouraged to see state level agreement from the Lower Basin to take measures to reduce consumptive use over the interim operations period. American Whitewater does not have a position on the exact nature of the cuts. Water being conserved in the interim is important to the long term sustainability of the Colorado River and has important implications on how river health and recreation are maintained now and long into the future. There were a number of alternative proposals left out of this planning process. The limited scope of revisions to the 2007 Interim Guidelines is understandable, but a broader analysis will be important to ensure all stakeholders in the basin have favorable conditions heading into post-2026 operations.

The potential for reduced flows within the Grand Canyon under the Proposed Alternative do pose some concern from American Whitewater, however, the greater opportunity for variable river flows and higher potential for high flow experiments cannot be understated. These controlled and short high flows are incredibly important to transfer tributary sediment onto sandbars and beaches providing benefits to both recreation and riparian health.¹ Therefore, American Whitewater is supportive of the proposed alternative that will allow for more flow variety in the interim while long term operations under a much broader scope can be considered. As described below, the analysis Reclamation has completed to date on the impacts to whitewater boating are in need of further and more in-depth evaluation.

The No Action Alternative has a higher probability of slightly to substantially higher river flows, but also moves the system closer to failure especially with regards to water levels at Glen Canyon Dam. For the long term this would have a greater impact on the ability to provide flows in the Grand Canyon and thus should not be selected as the preferred alternative.

It is important for evaporation, seepage, and system losses to be incorporated into this SEIS analysis and not in a separate report. Despite improved hydrology from water year 2023 and commitments to Lower Basin conservation, continuing to ignore real losses from evaporation, reservoir operators have the potential to lower Lake Powell elevations faster than projected. This SEIS analysis is not looking into the broader scope of potential future scenarios that include drastically reduced hydrology and hydrology that isn't supported by the engineering realities of basin infrastructure, importantly, Glen Canyon Dam. The SEIS needs to be informed by the latest science and data now to set all basin stakeholders up for success beyond the planning horizon of this NEPA process.

¹ Melis TS, Korman J, Kennedy TA. 2012. Abiotic and biotic responses of the Colorado River to controlled floods at Glen Canyon dam, Arizona, USA. *River Research and Applications* 28: 764–776



Geographic Scope

Both the No Action Alternative and the Proposed Action Alternative need to thoroughly analyze the operational and drought effects on recreation and the environment throughout the whole project area. The geographic scope of the Draft SEIS includes from full pool Lake Powell to the Southerly International Boundary.² This boundary includes over 30 miles of the Cataract Canyon whitewater reach³ and over 60 miles on the San Juan River downstream from Grand Gulch.⁴ Additionally, there is a 30-mile reach below Hoover Dam through the Black Canyon Water Trail that is supported by releases out of Hoover Dam.⁵ All three of these river recreation opportunities need to be analyzed and managed for in the SEIS in addition to considerations of recreation within the Grand Canyon in addition to considerations of recreation within the Grand Canyon. The acknowledgement of whitewater boating as a key recreational activity is important, but it needs to be fully assessed within the entire geographic scope of the SEIS. Additionally, while we understand the limitations in geographic scope for near-term operations, it will be of utmost importance that long-term operation planning includes impacts to the entire Colorado River Basin and the 4,400 miles of whitewater boating that exist in the geographic basin boundary.⁶

Flows for Whitewater Recreation

In addition to ensuring that all whitewater reaches within the geographic scope are included, more robust flow information needs to be employed to appropriately assess the effects of reservoir operations on whitewater boating and the industries that depend on it. Flow needs that support river recreation opportunities and sensitive environmental factors are complex, however there is robust scientific information that supports flow needs for recreation in the Grand Canyon and Cataract Canyon of the Colorado River. The alternatives need to include a robust analysis of science-based flow information for both river recreation and environmental factors that are affected by operations at Glen Canyon and Hoover Dams.

In the Draft SEIS published in April 2023 and again in the Revised Draft SEIS, the Bureau made incorrect or incomplete statements about river recreation, claiming that because flows were not anticipated to be below 5,000 cfs in the Grand Canyon that recreation would only have minor changes in use value and economic activity.⁷ However, river recreation in the Grand Canyon is more nuanced than a singular flow minimum. This is well documented in a study completed by Shelby, et al. (1992), that characterized minimum acceptable flows as 10,000 cfs, optimal flows of 20,000 - 25,000 cfs, and a maximum acceptable flow of 45,000

² Revised Draft SEIS, p. 3-1

³ <https://www.returningrapids.com/trip-reports>

⁴ https://drive.google.com/file/d/1PpqVU6NFp-wwBRJzyBwsrxUamSc0H_M5/view

⁵ <https://www.americanwhitewater.org/content/River/view/river-detail/3190/main>

⁶ Determined from American Whitewater's National Whitewater Inventory using GIS analysis by Kestrel Kunz on Dec. 5, 2023 <https://www.americanwhitewater.org/content/River/view/river-index>

⁷ Revised Draft SEIS, p. 3-327



cfs.⁸ The statement in the DSEIS regarding the 5,000 cfs minimum is not backed up with evidence or given context and the findings from studies referenced above show that the aggregate minimum acceptable flow is twice that at 10,000 cfs. The USGS has also conducted multiple studies (Neher et al., 2017; Neher et al., 2019) assessing the willingness to pay of whitewater boaters in the Grand Canyon. Both studies found that whitewater boaters have a much lower willingness to pay when flows are at 5,000 cfs compared to three other higher flow scenarios assessed.⁹ The DSEIS wrongfully states that under both alternatives, economic contributions from commercial whitewater rafting are supported under all alternatives due to minimum flow requirements...¹⁰ The probability of maintaining only those minimum flow requirements as described in the Long-Term Experimental Management Plan (LTEMP) negates this claim of Reclamation as to the impacts on affected resources. We recognize that the SEIS is referring to the LTEMP for recreational flow information, however there is a lot of information in the LTEMP that is not included in the SEIS, leading to a lack of context and incorrect information in the SEIS. All three studies cited in the LTEMP, Bishop et al. (1987)¹¹, Shelby et al., (1992)¹², and Stewart et al. (2000)¹³, found that minimum safe flows were identified between 7,800 cfs and 9,200 cfs. Additionally, all of the modeled traces in the LTEMP did not return flows that were below 8,000 cfs.¹⁴ There is clearly additional information in the LTEMP that was not cited or reviewed to inform the SEIS and there is additional data that was not included in the LTEMP and should be included in the current NEPA process for the SEIS. The existing data that is based in science and is peer-reviewed, demonstrates that 5,000 cfs is not the only flow threshold that is needed to describe the river recreation opportunities that are affected by operations at Glen Canyon Dam.

In addition to studies that have assessed flow needs for river recreation in the Grand Canyon, American Whitewater has conducted numerous flow-dependent recreation studies on the Colorado River and its tributaries in the Upper Basin. Stafford et al. (2016) extensively quantifies the flows that support river recreation opportunities in Cataract Canyon upstream from Glen Canyon, identifying both acceptable and optimal flow ranges and quantifying how

⁸ Shelby, B., Brown, T., Baumgartner, R. (1992) Effects of Streamflows on River Trips on the Colorado River in Grand Canyon, Arizona. *Rivers*, 3(3), 191-201. <https://www.americanwhitewater.org/content/Document/fetch/id/518/.raw>

⁶ Ibid.

⁹ Neher, C., Duffield, J., Bair, L., Patterson, D., & Neher, K. (2017). Testing the limits of temporal stability: willingness to pay values among grand canyon whitewater boaters across decades. *Water Resources Research*, 53. <https://doi.org/10.1002/2017WR020729>; Christopher Neher, Lucas Bair, John Duffield, David Patterson & Katherine Neher (2019) Convergent validity between willingness to pay elicitation methods: an application to Grand Canyon whitewater boaters, *Journal of Environmental Planning and Management*, 62(4), 611-625, DOI: 10.1080/09640568.2018.1435411

¹⁰ Revised draft DSEIS, p. 2-33

¹¹<https://gcdamphistory.org/wp-content/uploads/2020/11/1987-Bishop-et-al.-Glen-Canyon-Dam-Releases-and-Downstream-Recreation-An-Analysis-of-User-Preferences-and-Economic-Values.pdf>

¹² Shelby, B., Brown, T., Baumgartner, R. (1992) Effects of Streamflows on River Trips on the Colorado River in Grand Canyon, Arizona. *Rivers*, 3(3), 191-201.

<https://www.americanwhitewater.org/content/Document/fetch/id/518/.raw>

¹³ Stewart, W., K. Larkin, B. Orland, D. Anderson, R. Manning, D. Cole, J. Taylor, and N. Tomar. (2000) Preferences of recreation user groups of the Colorado River in Grand Canyon. Report submitted to the Grand Canyon Monitoring and Research Center, Flagstaff, AZ.

¹⁴ LTEMP EIS at J-18



often these flows occur across varying hydrological conditions (i.e., boatable day).¹⁵

These are just a few examples of the river recreation data that are already published and that should be integrated into the NEPA analysis for each alternative proposed for long-term operations at Glen Canyon and Hoover Dams.

Tribal Water Rights

Tribal water rights and Indigenous Traditional Ecological Knowledge need to be prioritized in all management decisions. The SEIS indicates that neither alternative would impact established water rights yet is silent on how conditional or unquantified water Tribal Water Rights have the chance to be effected. Tribes have some of the most senior water rights on the Colorado River, yet they have been left out of management decisions since those water rights were established. Joint Secretarial Order No. 3403 directs agencies with the Department of Interior to collaborate with Indian Tribes on decision making affecting management of Federal lands and waters.¹⁶ As Reclamation incorporates alternative management scenarios from Basin States, any proposed alternatives that have not considered the development of unperfected Tribal water rights and have not included thorough collaboration with affected Basin Tribes, should not be considered a complete alternative. Any proposed water allocations and reductions in interim operations need to fully analyze impacts to both developed and undeveloped Tribal water rights. Many of these Tribes and other Native American communities in the Colorado River Basin have spent millenia living in symbiosis with the Colorado River despite droughts, floods, and other extreme environmental conditions. Their wealth of experience passed down through generations should be sought out and prioritized in the development of NEPA alternatives. The use of Indigenous Traditional Ecological Knowledge should be used to inform federal decision making as directed by White House Memorandum dated November 15, 2021, *Indigenous Traditional Ecological Knowledge and Federal Decision Making*.¹⁷

¹⁵ Stafford, E., Fey, N., and Vaske, J. J. (2016) Quantifying Whitewater Recreation Opportunities in Cataract Canyon of the Colorado River, Utah: Aggregating Acceptable Flows and Hydrologic Data to Identify Boatable Days. *River Research and Applications*, 33. 162-169. DOI: 10.1002/rra.3049

¹⁶ Department of Interior and US Department of Agriculture. (2021, November 15). Joint Secretarial Order on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters. <https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3403-joint-secretarial-order-on-fulfilling-the-trust-responsibility-to-indian-tribes-in-the-stewardship-of-federal-lands-and-waters.pdf>

¹⁷ The White House. (2021, November 15). Indigenous Traditional Ecological Knowledge and Federal Decision. <https://www.whitehouse.gov/wp-content/uploads/2021/11/111521-OSTP-CEQ-ITEK-Memo.pdf>⁷
Southwick Associates. (2012). *Economic Contributions of Outdoor Recreation on the Colorado River & Its Tributaries*. Protect the Flows.



Thank you for considering American Whitewater's comments on the Revised Draft Supplemental Environmental Impact Statement.

Sincerely,

A handwritten signature in black ink that reads "Kestrel Kunz".

Kestrel Kunz
Protection Director
Southern Rockies Program
American Whitewater
kestrel@americanwhitewater.org

A handwritten signature in black ink that reads "Hattie Johnson".

Hattie Johnson
Restoration Director
Southern Rockies Program
American Whitewater
hattie@americanwhitewater.org