



— BUREAU OF —
RECLAMATION

Scoping Summary

**Supplemental Environmental Impact Statement for Near-Term
Colorado River Operations**

Upper Colorado Basin Region and Lower Colorado Basin Region



Mission Statements

The Department of the Interior (DOI) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Front Cover: Glen Canyon Dam photo. Bureau of Reclamation

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ACRONYMS AND ABBREVIATIONS

DOI	Department of the Interior
EIS	Environmental Impact Statement
FONSI	Finding of No Significant Impact
ICS	Intentionally Created Surplus
LTEMP	Glen Canyon Dam Long-Term Experimental and Management Plan
MSCP	Lower Colorado River Multi-Species Conservation Program
MST	Mountain Standard Time
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPS	National Park Service
Reclamation	Bureau of Reclamation
SEIS	Supplemental Environmental Impact Statement
Project	Supplemental Environmental Impact Statement to the December 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for the Lake Powell and Lake Mead Project
WAPA	Western Area Power Administration
2007 Interim Guidelines	December 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Chapter 1. Introduction

This Scoping Summary was prepared for the Supplemental Environmental Impact Statement to the December 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines) Project (the project). The project was initiated to develop and analyze additional potential operations for 2023–2026 pursuant to the National Environmental Policy Act (NEPA). This process will entail the preparation and publication of a Supplemental Environmental Impact Statement (SEIS) that analyzes and documents all relevant impacts, conditions, and issues associated with the proposed action and its alternatives; public review processes; and other related activities.

1.1 Project Purpose and Need

The purpose of the SEIS is to supplement the Environmental Impact Statement (EIS) completed in 2007 for the 2007 Interim Guidelines in order to modify operating guidelines for the operation of Glen Canyon and Hoover Dam to address historic drought and low runoff conditions in the Colorado River Basin. The need for the revised operating guidelines is based on the potential that continued low runoff conditions in the Colorado River Basin could lead Glen Canyon Dam to decline to critically low elevations impacting both water delivery and hydropower operations in 2023 and 2024.

1.2 Scoping Period

The Bureau of Reclamation (Reclamation) published a Notice of Intent (NOI) to prepare an SEIS and a modified Record of Decision for the 2007 Interim Guidelines in the Federal Register on November 17, 2022. A 45-day scoping comment period was held from November 17, 2022, to December 20, 2022.

Reclamation notified interested parties of the NOI and scoping comment period through an email notification to the project mailing list (1,214 recipients) on December 1, 2022. The email notification consisted of a notice of the NOI and two public webinars.

Two virtual public webinars were held during the scoping period. Table 1 provides a summary of the dates, times, and meeting attendance of the webinars. The webinars included an opening statement, a presentation that summarized the NOI, a range of hydrology and operations scenarios that will inform the SEIS analysis, an overview of potential alternatives being considered in the SEIS, information on the SEIS process schedule, and a question-and-answer session. The webinars were recorded and published on the project website:

<https://www.usbr.gov/ColoradoRiverBasin/SEIS.html>.

1 **Table 1. Public Scoping Webinar Information**

Meeting Format	Meeting Date	Meeting Time	Number of Attendees
Virtual Webinar	November 29, 2022	10:00 a.m. to 12:00 p.m. Mountain Standard Time (MST)	184
Virtual Webinar	December 2, 2022	11:00 a.m. to 1:00 p.m. MST	241

2 Public comments were accepted during the comment period by email to CRinterimops@usbr.gov or by
3 mail to Reclamation 2007 Interim Guidelines SEIS Project Manager, Upper Colorado Basin Region,
4 125 South State Street, Suite 8100, Salt Lake City, Utah 84138.

5 **1.3 Scoping Summary Overview**

6 This scoping summary was prepared to document the scoping process for the 2007 Interim
7 Guidelines Project. Public input received during scoping will inform the SEIS analysis, including the
8 identification of stakeholder concerns, analysis issues, and alternatives development.

9 This scoping summary summarizes all public comments received during the scoping period
10 (November 17, 2022, to December 20, 2022). Additionally, this report considers comments received
11 by email and mail up to January 31, 2023. Reclamation may continue to receive and consider scoping
12 comments beyond January 31, 2023; however, those comments are not summarized in this scoping
13 summary.

14 All public comments received are retained in the project's administrative record. Public comments
15 received between November 17, 2022, and January 31, 2023, were also made available for public
16 viewing in an accessible format on the project website.

Chapter 2. Comment Collection and Analysis

The overall goal for scoping comment collection and analysis is to ensure that all scoping comment submittals are tracked and considered in the development of the issues to be addressed in the SEIS analysis. The comment analysis process consists of reading and coding comments using a comment coding structure, interpreting and analyzing the comments to identify issues and themes, and preparing comment summaries.

2.1 Comment Processing

An electronic comment analysis and reporting database was used to manage the comment submittals. Comments received included the following letter types:

- **Unique** submittals with unique content
- **Form Letter** submittals from multiple entities or individuals containing the identical or similar content
- **Form Plus** letters that have additional unique content in addition to the form letter content

Names, contact information, and letter text for all respondents were entered into the database. Each database entry was considered a “submittal” and assigned a unique number, and the sender type was captured to indicate the entity from which it was received (i.e., individual, government, non-governmental organization, or tribe). Submittals that included only a person’s name and any address information were categorized as having been received from an individual. Comments from businesses were also categorized as individual. Submittals with affiliation to a government (federal, state, local), Tribe, or non-governmental organization were assigned to the corresponding category. Submittals from elected officials were categorized as government or Tribe, depending upon their affiliation. Submittals from water management agencies, water and irrigation districts, and water service providers were categorized as government submissions due to the governmental and quasi-governmental status of the senders (e.g., Colorado River Commission of Nevada, Coachella Valley Water District, Denver Water).

The content of the submittals was then filtered using various database queries and by reading through submittal text to identify potential form letters and form plus submittals. The content of the form letters was treated as one single comment submission; however, Reclamation tracked the total number of form letters received.

After the submittals were entered into the database, each unique and form plus submittal was read to identify specific comments. A coding structure was developed to help thematically sort comments in the database into logical topics that represent issues and concerns for the SEIS. Outputs from the database consist of tallies of the total number of submittals and comments received, sorting and reporting comments by a topic or issue, and demographic information of the senders. Section 2.2, Summary of Comment Submittals, summarizes the results of comment processing.

2.2 Summary of Comment Submittals

Reclamation received 1,353 submittals, of which 79.3% were form letters, 13% were unique letters, and 7.7% were form plus letters (Table 2). The majority (85.8%) of senders were individuals (Table 3). Tribal, government, and non-governmental organization sender affiliations are provided in Table 4. From these submittals, 1,105 comments were identified. The coding structure themes, and the number of comments coded to each theme, are summarized in Table 5. A summary of the comment themes is provided in Chapter 3.

Table 2. Submittals by Type

Type	Number of Submittals	Percentage of Total Submittals
Unique	176	13.0
Form Letter	1,073	79.3
Form Plus	104	7.7
Total	1,353	100

Table 3. Sender Affiliations

Affiliation	Number of Senders	Percentage of Total Senders
Government	99	6.9
Non-governmental Organization	71	4.9
Tribe	34	2.4
Individual	1,224	85.8
Total	1,428	100

Note: The total number of senders does not equal the total number of letter submittals as more than one sender may be affiliated with a submittal.

Table 4. Tribe, Government, and Non-governmental Organization Affiliations

Tribe	
Ak-Chin Indian Community	Pascua Yaqui Tribe
Gila River Indian Community	Quechan Indian Tribe
Havasupai Tribe	San Carlos Apache Tribe
Hopi Tribe	Southern Ute Indian Tribe
Hualapai Tribe	Tohono O'odham Nation
Jicarilla Apache Nation	Tonto Apache Tribe
Kaibab Band of Paiute Indians	Ute Tribe of the Uintah and Ouray Reservation
Navajo Nation	Ute Mountain Ute Tribe
Paiute Indian Tribe of Utah	Yavapai-Apache Nation

Government	
Arizona Department of Water Resources	Irrigation and Electrical Districts' Association of Arizona
Arizona Re-Consultation Committee	Metropolitan Water District of Southern California
Association of Metropolitan Water Agencies	New Mexico Interstate Stream Commission
Aurora Water	Northern Colorado Water Conservancy District
Bureau of Land Management	Platte River Power Agency
California Department of Water Resources	Pueblo Water
Central Arizona Water Conservation District	Salt River Project
City of Goodyear Public Works Department	San Diego Water Authority
City of Henderson	Scottsdale Water
City of Peoria Water Services Department	Southeastern Colorado Water Conservancy District
Coachella Valley Water District	Southern Nevada Water Authority
Colorado River Authority of Utah	Southwestern Water Conservation District
Colorado River Basin State Representatives of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming	State of New Mexico
Colorado River Board of California	Town of Gilbert
Colorado River Commission of Nevada	United States Fish and Wildlife Service
Colorado River Water Conservation District	United States Environmental Protection Agency, Region IX
Colorado School of Mines	United States National Park Service, Intermountain Region
Colorado Springs Utilities	Upper Colorado River Commission
Colorado Water Conservation Board	Upper Gunnison River Water Conservancy District
Denver Water	Utah Associated Municipal Power Systems
Dolores Water Conservancy District	Washington County Water Conservancy District
Gunnison Board of County Commissioners	Wyoming State Engineer's Office
Imperial Irrigation District	Yuma County Water Coalition
Non-governmental Organization	
Active Climate Rescue Initiative	Multiple/Colorado River Sustainability Campaign
American Rivers	National Audubon Society
American Whitewater	National Parks Conservation Association
Arizona Daily Star	Pacific Energy Policy Center
Arizona Municipal Water Users Association	Pacific Institute
BlueRibbon Coalition	Returning Rapids Project
Center for Biological Diversity	Save the Colorado
Colorado River Energy Distributors Association	Sierra Club
Conserve Southwest Utah	Sonoran Institute
Environmental Defense Fund	The Nature Conservancy
Glen Canyon Institute	Theodore Roosevelt Conservation Partnership
Grand Canyon Boaters Association	Trout Unlimited
Great Basin Water Network	Utah Rivers Council
Grand Canyon Trust	Utton Center, University of New Mexico School of Law
KUNC NPR for Northern Colorado	Waterkeeper Alliance

Las Vegas Waterkeeper	Western Resource Advocates
Living Rivers	Western Watersheds Project

1 **Table 5. Comment Theme Summary**

Theme	Number of Comments	Percentage of Total Comments
General		
General Support	21	1.9
General Opposition	4	0.4
Alternatives		
No Action	8	0.7
Alternative Suggestion	237	21.4
NEPA Process, Laws, and Regulations		
Post 2026-Guidelines	8	0.7
Multi-Species Conservation Program	6	0.5
Endangered Species and Section 7 Consultation	7	0.6
Mexico	13	1.2
Other laws and regulations	17	1.5
Public Involvement	20	1.8
Cooperating Agencies	16	1.4
Tribal Outreach and Section 106 Consultation	24	2.2
Stakeholders	60	5.4
Schedule	2	0.2
Scope of Analysis	78	7.1
Data Sources	15	1.4
Purpose and Need	6	0.5
Water Supply Management		
Management and Allocation	155	14.1
Hydrology Modeling	51	4.6
Resource Analysis Issue		
Recreation Boating	127	11.5
Recreation Other	48	4.3
Public Health and Safety	24	2.2
Aquatic Species/Fish	3	0.3
Terrestrial Species and Riparian Vegetation	1	0.1
Invasive and Non-native Species	3	0.3
Climate Change and Greenhouse Gas	2	0.2
Cultural and Tribal Resources	9	0.8
Indian Trust Assets	38	3.4
Hydrology and Water Quality	20	1.8
Electrical Power	22	2.0
Socioeconomics	36	3.3
Environmental Justice	8	0.7
Sedimentation and Geology	4	0.4

Agriculture and Irrigation	9	0.8
Air Quality	3	0.3
Total	1,105	100

1

Chapter 3. Comment Theme Summary

This section summarizes the form letter and unique scoping comment themes identified in the comment submittals.

3.1 Form Letter

One form letter with 1,073 submittals was received (Appendix A). The main themes from the form letter are the issues of boating recreation, boating access, and recreation economics associated with Lake Mead and Lake Powell. The form letter supports the BlueRibbon Coalition’s “Path to 3588’ Plan” and inclusions of a recreation-based alternative in the SEIS. The form letter also discusses the relationship and need for collaboration between Reclamation’s water management actions and the National Park Service’s (NPS’s) management of recreation resources at the reservoirs.

3.2 General Support and Opposition

Public comments include support for re-visiting the 2007 Interim Guidelines to provide an updated framework for operations given the changes in water availability. Many comments support a collaborative approach.

Public comments include general opposition to low reservoir water levels, concerns about the mismanagement of Colorado River water, and concerns regarding lost recreational opportunities.

3.3 Alternatives

No Action Alternative

Commenters expressed their opposition to the No Action Alternative. One comment notes that the Lower Colorado Conservation and Efficiency Program may contribute additional volumes of water in Lake Mead, which should be considered in the analysis of the No Action Alternative. They also recommend that the SEIS clearly distinguish between these voluntary actions and the existing agreements that control the operation of the dams.

Alternative Suggestion

The NOI provided a summary of the three preliminary alternatives under consideration by Reclamation (No Action, Framework Agreement Alternative, and Reservoir Operations Modification Alternative). The NOI requested public input on alternatives development and the alternative suggestion theme received the most comments (21.4%).

Alternative suggestions in the comments include feedback on the preliminary alternatives in the NOI, new detailed alternatives scenarios based on specific resource objectives, and recommendations for alternative components that could be considered under multiple alternative scenarios. The primary alternative scenarios are summarized below:

- 1 • **Reservoir Operations Modification Alternative or Federal Alternative:** Comments
2 provide recommendations for how Reclamation may structure a federal alternative based on
3 the federal government’s authority and applicable federal laws, regulations, and policies. One
4 of the main components of this alternative is the continued ability for Reclamation to meet
5 its existing water delivery and hydropower commitments.
- 6 • **Evaporation, Seepage, and System Losses:** Comments for this alternative request that
7 Reclamation develop a federal alternative that accounts for water evaporation, seepage, and
8 system losses. (See the related comment summaries below under Hydrology Modeling.)
- 9 • **Framework Agreement Alternative:** Comments for this alternative support a framework
10 alternative developed in coordination with the Basin States and their stakeholders. This
11 alternative would account for management actions that are outside of Reclamation’s
12 authority and would require commitments from the Basin States to implement, such as
13 modifications to the Drought Contingency Plan and implementing state and local level
14 conservation measures. Commenters noted that the Basin States are working collaboratively
15 to provide Reclamation with a consensus agreement and that Reclamation should continue
16 to work with these stakeholders in the SEIS process. Six Basin States (Arizona, Colorado,
17 Nevada, New Mexico, Utah, and Wyoming) submitted a consensus-based alternative (refer
18 to the Colorado River Basin State Representatives submittal for detailed components of this
19 alternative). California submitted a separate alternative proposal (refer to the Colorado River
20 Board of California submittal for detailed components of this alternative).
- 21 • **BlueRibbon Coalition/Recreation Alternative:** As described in the Form Letter summary
22 above, comments request that Reclamation consider a recreation-based alternative that
23 would prioritize maintaining water levels at Lake Mead and Lake Powell to serve recreational
24 boating needs (e.g., BlueRibbon Coalition’s “Path to 3588’ Plan”). Other recreation-based
25 alternative suggestions include maintaining river flows to support rafting in the Grand
26 Canyon and alternatives that preserve existing recreation facilities (e.g., boat launches,
27 marinas, etc.). (See the related comment summaries below under Recreation Boating and
28 Recreation [Other].)
- 29 • **Conservation Alternative:** Comments suggest that Reclamation design an alternative that
30 maintains Colorado River flows and supports ecosystem needs. A conservation-based
31 alternative would also include cuts to water allocations and implementing water conservation
32 measures in the Lower Basin.
- 33 • **Worst-Case Drought Alternative:** Comments suggest that Reclamation design an
34 alternative that is responsive to “worst-case” drought modeling. Commenters expressed
35 concern that the existing hydrology modeling does not represent the full range of potential
36 drought scenarios and that an alternative is needed to address prolonged drought conditions.
37 (See the related comment summaries below under Hydrology Modeling.)
- 38 • **One-Dam Alternatives:** Comments suggest an alternative that prioritizes the preservation
39 of one dam and reservoir (Hoover Dam/Lake Mead or Glen Canyon Dam/Lake Powell)
40 over the other.
- 41 • **Infrastructure Preservation Alternative:** Comments suggest an alternative that prioritizes
42 preservation of the hydropower production and operations and considers the contractual
43 obligations for power delivery.

1 Suggestions and concerns related to components of any alternative scenarios include the following:

- 2 • Changes to the mid-year review process would impact water deliveries to local irrigation
3 districts and water providers. Comments also provide suggestions for ways to structure the
4 reviews that would minimize disruptions to water deliveries.
- 5 • Reclamation should reevaluate Intentionally Created Surplus (ICS) management to address
6 shortages.
- 7 • Reclamation should maintain all existing water rights and allocations where required by
8 regulation or court order, including Tribal water rights. (See the related comment summary
9 below under Indian Trust Assets.)
- 10 • Reclamation should ensure that public health and safety needs are met, specifically those
11 related to water supply and electrical power.
- 12 • Reclamation should provide certainty and predictability for annual operations.
- 13 • Reclamation should consider the funding implications of the alternatives, including how
14 demand reduction measures or mitigation measures would be funded.

15 **3.4 NEPA Process, Laws, and Regulations**

16 **Post-2026 Guidelines**

17 Comments in this theme are related to Reclamation's planning process for the post-2026 operating
18 guidelines. Comments request that the post-2026 guidelines be responsive to changing conditions on
19 the Colorado River, be flexible given the range of expected hydrological conditions, and be prepared
20 in a transparent and equitable manner. Comments request more information on how this SEIS will
21 affect the post-2026 operating guidelines. Commentors also referenced and attached scoping
22 comments that were submitted for the post-2026 operating guidelines project.

23 **Multi-Species Conservation Program**

24 The Lower Colorado River Multi-Species Conservation Program (MSCP) provides Endangered
25 Species Act compliance for operations of the Lower Colorado River, including water deliveries and
26 hydropower. Many comments suggest reinitiating consultation and expanding the MSCP to ensure
27 diminished flows do not compromise species or habitat targets. This was a particular concern for
28 wildlife refuges downstream of Lake Mead (Havasu Refuge, Bill Williams Refuge, Cibola Refuge,
29 and Imperial Refuge).

30 **Endangered Species and Section 7 Consultation**

31 Commenters expressed their support for assessing impacts to threatened and endangered species
32 throughout the reaches of the Grand Canyon. Fish species were primarily of concern, but emergent
33 side canyons in Glen Canyon have created suitable habitat for the Mexican spotted owl.

1 **Mexico**

2 Commenters stated that Mexico is a key partner in addressing the Colorado River water shortages.
3 Many also recommended that any reductions should be made equally across the basin.

4 **Other Laws and Regulations**

5 Commenters generally expressed that the SEIS analysis should be consistent with applicable federal
6 laws, regulations, agreements, interstate compacts, and decrees. One comment recommends that the
7 NEPA review should be developed by a neutral third-party. Some of the laws and regulations
8 specifically mentioned by commenters for consideration in the SEIS include:

- 9 • “Law of the River” (collection of Colorado River rules, regulations, laws, and other
10 agreements)
- 11 • 1922 Colorado River Compact
- 12 • 1928 Boulder Canyon Project Act
- 13 • 1944 Mexican Water Treaty
- 14 • 1948 Upper Colorado River Basin Compact
- 15 • 1968 Colorado River Basin Project Act
- 16 • 1992 Grand Canyon Protection Act
- 17 • 1992 Central Valley Project Improvement Act
- 18 • 2003 Colorado River Water Delivery Agreement (Federal Quantification Settlement
19 Agreement)
- 20 • 2019 Colorado River Drought Contingency Plan Authorization Act, 2019 Drought
21 Response Operations Agreement, and 2019 Drought Contingency Plan

22 **Public Involvement**

23 Public comments express technical issues with the webinar and suggestions to use other webinar
24 platforms instead of Microsoft Teams. Commenters also requested that Reclamation extend the
25 public comment period, implement more robust stakeholder and public engagement opportunities,
26 and provide additional information that clearly explains impacts from all alternatives under
27 consideration.

28 **Cooperating Agencies**

29 Public comments include requests and recommendations for SEIS cooperating agency involvement.
30 The NPS requested cooperating agency status. One commenter requested Reclamation coordination
31 with the NPS regarding impacts to NPS boating resources. The U.S. Fish and Wildlife Service
32 affirmed its commitment to work with Reclamation on the SEIS. Several commenters expressed
33 support for Western Area Power Administration (WAPA) as a cooperating agency and one
34 commenter requested that Reclamation also coordinate with WAPA contractors that may be
35 affected by the project. One commenter suggested that Reclamation expand the cooperating
36 agencies to include the Environmental Protection Agency, Tribes, state wildlife agencies, and others

1 as cooperating agencies. Basin states also requested consultation and coordination with Reclamation,
2 including Wyoming, Colorado, California, the four upper basin states through the Upper Colorado
3 River Commission, and state and local water agencies.

4 **Tribal Outreach and Section 106 Consultation**

5 Public comments include support and requests for Section 106 consultation and Government-to-
6 Government consultation with Colorado River Basin Tribes. This includes seeking their input
7 throughout the NEPA process, as well as preparing an analysis of the project's impacts to Tribes.
8 Some comments support providing assistance to Tribes if water supplies are diminished.

9 **Stakeholders**

10 Public comments request the recognition of a diverse group of stakeholders, and adequate public
11 outreach and partnerships. Comments request that Reclamation work collaboratively with the basin
12 states, state and local water agencies, non-governmental organizations, and basin Tribes. One
13 commenter also requested that Reclamation coordinate with the local recreation businesses that may
14 be affected by Reclamation and NPS actions. Many comments are concerned with stakeholder input
15 being utilized and respected. Several comments list prior commitments that stakeholders have with
16 Reclamation (e.g., various Memorandums of Understanding, System Conservation Agreement,
17 Binational Intentionally Created Surplus Agreement, and 2019 Drought Contingency Plans). One
18 commenter suggests the Reclamation should encourage cooperation and understanding to avoid
19 litigation delays.

20 **Schedule**

21 One comment is concerned that the SEIS timeline is too short to develop sufficient solutions.
22 Another requests a more detailed schedule for alternatives development.

23 **Scope of Analysis**

24 Scope of analysis comments include general requests for the SEIS to analyze biological, cultural,
25 socioeconomic, and recreational impacts of the project. Others provide detailed requests for the
26 temporal, geographic, and resource analysis scope of the SEIS. Some comments request that
27 Reclamation consider both short- and long-term actions underway in the Colorado River system,
28 including other federal actions involving Colorado River infrastructure and prolonged drought
29 conditions and other emergency operations response upstream of Lake Powell. Some comments
30 request that the scope of this SEIS should be expanded to include operations through 2026.
31 Commenters requested that this SEIS and the post-2026 Guidelines process happen in parallel and
32 that a framework agreement serve as a guide for the post-2026 Guidelines (see the related comment
33 summary under Post-2026 Guidelines, above). Other comments request limiting the scope of the
34 SEIS to the 2023–2024 interim period.

35 Comments request that Reclamation limit the analysis to the operations at Lake Mead and Lake
36 Power and the same geographic scope of the 2007 Interim Guidelines analysis. Other comments
37 request that Reclamation consider actions in both the Upper and Lower Basins. Comments note
38 that the project actions may directly, indirectly, and cumulatively affect resources basin-wide and in
39 regions hydrologically connected to the basin (e.g., Salton Sea, Colorado River delta).

1 Other comments also request that the SEIS analyze impacts or modifications to the Glen Canyon
2 Dam Long-Term Experimental and Management Plan (LTEMP) guidelines.

3 **Data Sources**

4 Comments provide data sources for the SEIS analysis, including federal and state laws and
5 regulations, and scientific studies and reports on the topics of the Colorado River, recreation,
6 climate change and drought, and Colorado stream flow and losses, including methodology for
7 assessing lower basin system losses.

8 **Purpose and Need**

9 Public comments include suggestions for additions to, redefining, expanding, or rewording the
10 purpose and need statement. One comment suggests expanding the purpose and need past 2026.

11 **3.5 Water Supply Management**

12 **Management and Allocation**

13 Comments express interest in a wholistic approach to water management and allocation across the
14 Colorado River Basin that would address water shortages and drought conditions through demand
15 reduction. Comments under this theme include support for water conservation measures at the state
16 and local level, implementing new requirements for industrial and residential growth that would curb
17 water consumption, and placing restrictions on golf courses and landscaping irrigation in desert
18 communities. The primary concern under this theme is overconsumption of Colorado River water.

19 Comments also provide suggestions for alternative sources of water for the Colorado River,
20 including pipelines to deliver water from other areas of the United States and desalination plants in
21 California. Other comments suggest developing alternative renewable energy power sources to
22 lessen the reliance on hydropower.

23 **Hydrology Modeling**

24 Comments on hydrology modeling include proposed methods for modeling Colorado River flows
25 under baseline conditions and for the alternatives. Comments express concern with relying on
26 outdated modeling and assumptions given the known changes to Colorado River hydrology that
27 have occurred since the 2007 Interim Guidelines were developed. Comments request updated
28 baseflow modeling to reflect current conditions, as well as accounting for long-term climate
29 modeling and worsening drought conditions. Comments request that the modeling account for
30 evaporation, seepage, and system losses. Comments also provide independent modeling scenarios
31 and assumptions for Reclamation's consideration in developing the alternatives and conducting the
32 SEIS analysis.

3.6 Resource Analysis Issues

Recreation Boating

Comments express concerns regarding general access and boat ramp access to Lake Mead and Lake Powell, keeping those lakes filled to accommodate boating access, and the negative impacts of potential waterfalls related to reservoir retreat near Hite Marina and abandoned boats. Comments also express concerns regarding adverse economic impacts to Arizona, Nevada, towns and cities, and Tribe, and to businesses (boat dealerships and repair shops, food), marinas, campgrounds, services, concessions, other infrastructure. Comments raise concerns regarding job losses from the loss of the boating community; financial losses of personal boat and boat storage investments, lot rental fees at nearby mobile home parks, and fees paid to the NPS.

Commenters also requested that DOI, NPS, and Reclamation provide funding for the infrastructure needed to provide safe and functional operations for visitors and boaters as lake levels change; fulfill the obligations of extending launch ramps as stated in the March 2019 Lake Mead Low Water Plan Finding of No Significant Impact (FONSI); provide boating access at all levels as stated in the 2018 General Management Low Water Plan; use management strategies applied to other rivers (such as the Middle Fork River [Idaho]) as a model; and uphold their missions and work with marina owners to maintain these areas for public use.

Commenters suggested that Reclamation and the NPS review impacts to recreation holistically across Colorado River reservoirs, including mitigation opportunities downstream of the project (e.g., Lake Mohave). Lastly, commenters asked for an analysis of impacts on the water flows needed for recreation activities. Commenters suggested that new launch ramps should be built at Hemenway Harbor and Temple Bar; that the marina at Callville Bay should be moved to Echo Bay to allow for full access and entry points to Lake Mead; and that other smaller ramps that do not have existing infrastructure, such as the three previously mentioned, should not be maintained. Other commenters would like access to landing sites and boat ramps kept open, reopened, extended, or portable launch ramps used.

Many commenters also expressed the importance of boating on Lake Mead, Lake Powell, and the Colorado River and the enjoyment it brings, stating that these areas are important outdoor recreation areas that provide solace during hot summer months and have been a part of their family traditions and memories for generations. They expressed concern about the effects of closing boating access on mental health and individual's livelihoods. Lastly, commenters stated that Lake Mead and Lake Powell National Recreation Areas are for the public and that they are two of the most visited parks in the United States and should remain open to the public, adding that the NPS would never consider closing access to other well-known parks.

Recreation (Other)

Comments cite economic benefits of recreation; express concerns about changes in recreation opportunities and the resulting economic losses and job losses that would affect the state, towns, and cities, and Tribes, as well as businesses, organizations, campgrounds, services, concessions, and other infrastructure; and cumulative recreational impacts. Commenters requested an analysis of impacts on the water flows needed for recreation activities, and an analysis of emerging recreation resources in the tributary rivers and canyons, including rafting and hiking in Glen Canyon, and

1 noted the related impacts that operational strategies would have on environmental resources
2 including vegetation, wildlife, and archaeological/cultural sites in Glen Canyon.

3 Comments also express interest in coordinating with the NPS to plan for new recreational
4 opportunities (such as rafting, kayaking, paddle boarding, swimming, and hiking) as water levels
5 change, and ask the NPS not to remove established recreation sites prior to evaluating the long-term
6 potential for recreation opportunities at the reservoirs.

7 **Public Health and Safety**

8 Several commenters suggested that determinations regarding water allocations should consider the
9 unique elements of every basin community as well as the local laws and regulations in those regions.
10 Commenters from several communities in the affected area are concerned about the impact to water
11 supply, electricity, and ultimately the impact to public health and safety. One commenter noted that
12 public health and safety concerns go beyond drinking water and includes concerns with reduced
13 water deliveries to schools, hospitals, manufacturing, and other industries. Commenters stated that
14 public health and safety should be prioritized above all other resources.

15 Other commenters shared the health benefits related to recreation access, noting that limiting access
16 to Lake Mead and Lake Powell could result in negative impacts to public health. Another comment
17 noted public health and safety concerns related to water quality impacts associated with low
18 reservoir water levels (see the Hydrology and Water Quality summary below.)

19 **Aquatic Species and Fish**

20 Commenters expressed that dams and water diversions have negatively impacted biodiversity and
21 ecosystems along the Colorado River, especially for endangered fish species. Commenters suggested
22 the SEIS should consider threatened and endangered aquatic species and fish in detail, their habitats,
23 and the entire Colorado River ecosystem. Finally, one commenter suggested that the natural
24 environment should be prioritized above all other resource issues.

25 **Terrestrial Species and Riparian Vegetation**

26 One comment indicates that Glen Canyon's side canyons are rebounding with riparian forests
27 (i.e., willows and cottonwoods). These areas have an abundance of native plant and animal species,
28 allowing it to compete with non-native species and add to the ecological integrity of the Colorado
29 River system. The commenter requested the SEIS include an assessment of impacts to these
30 emerging resources in Glen Canyon.

31 **Invasive and Non-native Species**

32 Most comments express concerns regarding warm water invasive fish species (e.g., smallmouth bass,
33 green sunfish) and how altered flow regimes and warmer temperatures are beneficial for these
34 species and ultimately impact the endangered humpback chub. One comment recommends a
35 screening upstream of the dams to prevent invasive species from passing through or requests other
36 alternatives to limit invasive species.

1 **Climate Change and Greenhouse Gas**

2 Comments regarding climate change and greenhouse gas recommend using the best available science
3 to accurately predict the impacts of climate change on the future hydrology of the Colorado River
4 and applying it to all alternatives in the SEIS. Comments are concerned that several agencies that
5 rely on hydropower may be required to purchase power from other non-renewable sources if they
6 cannot get adequate power from the dams, resulting in greater greenhouse gas emissions.

7 **Cultural and Tribal Resources**

8 Several Tribes provided comments regarding the cultural significance of the Colorado River, water,
9 and the Grand Canyon area. Other comments focus on the Glen Canyon area, noting that many
10 archaeological sites that have been inundated by water are now emerging due to lower water levels,
11 putting them at increased risk. One commenter recommended analyzing impacts to these
12 undocumented cultural resources as part of the SEIS analysis.

13 **Indian Trust Assets**

14 Reclamation has trust responsibility to ensure the Colorado River Basin Tribes are included in the
15 development and implementation of policies and rules that govern how the Colorado River will be
16 managed. Many comments express that Tribal consultation is critical for this project and emphasize
17 the obligation Reclamation has to the Tribes. Many Tribes and Tribal projects are reliant on the
18 Colorado River for water supplies, and for some Tribes, it is the sole source of potable water for
19 their community. Other Tribes are currently in the process of negotiating water rights
20 (i.e., unquantified water rights) to meet water needs of their communities and are concerned about
21 the project's impacts on these negotiations.

22 Other comments recommend that proposed water allocations and reductions in interim operations
23 need to fully analyze impacts to both developed and undeveloped Tribal water rights. In addition,
24 one comment suggests including Indigenous Traditional Ecological Knowledge to inform federal
25 decision making as directed by White House Memorandum dated November 15, 2021, Indigenous
26 Traditional Ecological Knowledge and Federal Decision Making.

27 Regarding alternatives, Tribes generally expect that Reclamation will prepare its alternatives with the
28 full knowledge of the unique aspects of each Tribe's water rights. One Tribe commented that they
29 will not support an alternative that prevents any Tribe with lands in Utah from developing water
30 rights recognized under federal law and decreed under state law. Suggested management actions
31 include developing separate Tribal water banks and drinking water allocations. Another commenter
32 suggested evaluating if "shovel-ready" projects could help mitigate impacts because of any
33 reductions.

34 **Hydrology and Water Quality**

35 Commenters recommended that the SEIS consider the following impacts related to hydrology and
36 water quality: analysis of impacts related to the restoration of the natural flow of the Colorado River;
37 analysis of water quality impacts resulting from dams and reservoirs (e.g., concentrations of toxic
38 compounds); impacts to the Colorado River basin groundwater watersheds; impacts to water quality

1 and protected values within designated NPS lands; and impacts to other reservoirs used to
2 supplement Lake Mead and Lake Powell.

3 Regarding potential reductions in water allocations, commenters recommended the SEIS consider
4 the following impacts: ancillary impacts to water users; impacts to groundwater resulting from
5 increased use; and access to clean, potable water, especially for Tribes.

6 Several commenters were concerned that lower reservoir capacity can lead to favorable conditions
7 for toxic algal blooms, increased risks for water-borne diseases, and low dissolved oxygen. These
8 water quality impacts are related to public health and would affect all downstream users.
9 Commenters state that documented evidence of these conditions should be considered in the SEIS.

10 **Electrical Power**

11 Comments include concerns regarding hydropower delivery, availability, cost, and reliability when
12 water levels are at or near dead pool. Some commenters suggested that hydropower should have
13 priority over other water uses, while some commenters stated that hydropower should not preclude
14 or impair appropriation of water. Commenters stated the SEIS should include analysis of the direct
15 and indirect effects of these issues, as well as cumulative effects analyses on hydropower production,
16 contractual obligations, societal impacts, and grid operations. Many commenters are concerned
17 about impacts on existing agreements for hydropower and the impacts that could be passed on to
18 customers. Some commenters suggested an analysis of alternative energy sources to fill the gaps
19 from reduced hydropower.

20 **Socioeconomics**

21 Comments include concerns regarding the economic impacts from loss of recreational revenue to
22 local and regional economies. Commenters suggested evaluating the societal and economic impacts
23 to surrounding communities and tribes should recreation be reduced. Additional comments included
24 concerns about the economic impact from reduced water supply to communities, agricultural areas,
25 and Tribes that rely on the delivery of water. (See the related comment summaries under Recreation
26 Boating, Recreation [Other], Indian Trust Assets, and Agricultural and Irrigation.)

27 **Environmental Justice**

28 Comments include concerns regarding environmental justice for rural, agricultural, Tribal, and
29 underserved communities, including the topics of access to water, economic impacts from changes
30 to recreation management, and economic impacts from reduced water supplies or reduced
31 hydropower. One commenter was concerned about disproportionate impacts to people with
32 disabilities regarding access to recreational opportunities.

33 **Sedimentation and Geology**

34 Comments include concerns regarding changes in local geology that could lead to increased
35 sedimentation, rock falls, quicksand, and cliff calving. Commenters are concerned this could lead to
36 public safety hazards or changes in water quality to downstream areas and would like these issues
37 analyzed in the SEIS.

1 **Agriculture and Irrigation**

2 Comments include concerns regarding reduced water supply to Tribal and private lands for
3 agriculture and farming. Concerns include the economic impact to the agricultural industry, farm
4 workers, and local communities from reduced water supplies, as well as concerns about the national
5 food supply should production drop. Commenters support continued water supply as well as the
6 development of sustainable and resilient farming practices.

7 **Air Quality**

8 Comments include concerns regarding exposed lakebed and shoreline in the Colorado River
9 reservoirs and the Salton Sea in California that may lead to increased dust and particulate matter in
10 the air and pose a health hazard. One commenter was concerned that reduced water deliveries may
11 impact urban trees, which would in turn reduce the benefits that urban trees have on air quality.

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APPENDIX A

Form Letter 1

1 **Form Letter 1**

2 Dear Project Manager:

3 I enjoy recreating on public lands and waters. I also recognize the importance of the reservoirs and
4 dams in the Colorado River Basin for providing a reliable source of water and energy. I am writing
5 to provide feedback for the Supplementary Environmental Impact Statement (SEIS) to the
6 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake
7 Powell and Lake Mead as well as the National Park Service's proposed concepts for addressing low
8 water levels on Lake Mead. I recognize that this message is being sent to both agencies, because
9 even though each agency is conducting a separate planning process, the two plans are interrelated.

10 I believe the Bureau of Reclamation needs to take action due to declining water levels in reservoirs. I
11 encourage the Bureau of Reclamation and National Park Service to consider the recreation interests
12 of Lake Mead and Lake Powell. I believe BOR and NPS need to protect the future of recreation and
13 motorized access on the reservoirs. If NPS chooses to not build new infrastructure or maintain
14 current resources based on low water levels it could jeopardize or completely eliminate the
15 recreational experience of over 7 million visitors to Lake Mead and 4 million visitors to Lake Powell.

16 BOR may need to take unprecedented actions in order to preserve water levels in Lake Powell and
17 Lake Mead. I support the BlueRibbon Coalition's Path to 3588' Plan as it will address low water
18 levels in Lake Powell and Lake Mead. This plan is a common sense path that balances the needs of
19 all the water users in the basin. By adjusting outflows against actual inflows and current lake levels in
20 Lake Mead and Lake Powell, this plan creates a sustainable path forward for adaptively managing
21 these reservoirs instead of managing them headlong into a crisis. I oppose BOR's current path of
22 liquidating these reservoirs to the point of crisis. The substantial pain at the end of the path BOR is
23 currently on will be far worse than the minor temporary pain required now to correct course.

24 As the Bureau of Reclamation creates alternatives, BOR needs to strongly consider the needs of
25 recreational users and balance these needs along with the interests of other water users. Outdoor
26 recreation generates billions of dollars each year, sustaining many local economies. These
27 communities rely on continued recreation access to Lake Powell and Lake Mead for continued
28 economic growth. These communities, which include neighboring Tribal Nations, would suffer
29 significant losses if recreation is lost or decreased due to water elevation levels. As launch ramps and
30 marinas close due to water levels, businesses are hurt and economic losses impact the entire region
31 surrounding the Lake. NPS estimates that both Lake Mead and Lake Powell produce almost \$500
32 million in direct economic impact to gateway communities, and we estimate that the broader impact
33 is measured in billions. This economic impact dwarfs the economic impact created by power. By
34 developing a "recreation alternative" BOR will also have a plan that allows for better water level
35 buffers that are needed to prevent reaching the points of lost power generation capacity and/or dead
36 pool.

37 We are already starting to see unthinkable impacts to recreation because of the lack of viable
38 guidelines for addressing shortages in Lake Powell and Lake Mead. Regarding Lake Mead the
39 National Park Service is considering the closure of each major marina on Lake Mead, I do not
40 support any of the proposals identified in Concept 3 of the NPS plan that would remove all
41 infrastructure and facilities. Concept 3 completely ignores the current and future needs of the public
42 and should not be considered. However, NPS says this alternative in the planning process is

1 necessary in the case that BOR adopts a plan for managing lake levels that doesn't do what is
2 necessary to keep both lakes at higher levels. I strongly support any concept proposed by NPS that
3 makes the necessary adaptations to keep as many facilities open to serve as many members of the
4 public as possible.

5 I hope BOR and NPS will include analysis of the economic importance of recreation in addition to
6 feedback on power generation and water deliveries. Because there are so many variables affecting
7 the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir
8 elevations the Bureau needs to consider changing the "target" elevation. In the long run, I think
9 3588 feet is a better target elevation for Lake Powell and an elevation between 1050 and 1075 is a
10 better elevation for Lake Mead to meet the demand for recreation on the lake in a way that also
11 protects the power generation and water right interests.