



HAVASUPAI TRIBAL COUNCIL

P.O. Box 10 • Supai, Arizona 86435
(928) 448-2731 • Fax (928) 448-2551

December 15, 2022

Reclamation 2007 Interim Guidelines SEIS Project Manager

Upper Colorado Basin Region

123 South State Street, Ste 8100

Salt Lake City, Utah 84138

Via email: CRinterimops@usbr.gov

Subject: Havasupai Tribe (Tribe) Comments on the Bureau of Reclamation's Notice of Intent (NOI) to Prepare a Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Dear Sir or Madam:

We are the Havasuw `Baaja, the people of the blue-green waters, and are the traditional guardians of the Grand Canyon. The Havasupai, from the beginning of time, have inhabited the Grand Canyon and its environs. We are providing these comments on the NOI. We understand that the National Environmental Policy Act process is at an early stage. Nonetheless, we want the Bureau of Reclamation to understand how the alternatives it selects to analyze for operation of Lakes Mead and Powell may affect tribal trust assets of the Havasupai Tribe, including groundwater, surface water, and cultural assets throughout both our reservation lands and aboriginal lands, including special use lands within the Grand Canyon National Park pursuant to section 10 (e) of Public Law 93-620, the Grand Canyon Enlargement Act of 1975.

The Havasupai Tribe

The Havasupai Reservation is located in Coconino County, at the southwest corner of the Grand Canyon National Park comprising 188,077 acres of land. Our reservation consists of plateau country, dissected with deep, scenic canyons characteristic of the Grand Canyon. Havasu Canyon, is internationally known for its blue-green water and spectacular waterfalls adorned with travertine columns, shelves and skirts. Topography of the plateau areas varies from rolling, gentle slopes, to escarpments of outcrops of the Kaibab Limestone. Tourism is the primary source of income for the Tribe.

The Tribe has senior unquantified federal reserved water rights for both groundwater, Havasu Creek, and seeps and springs throughout the reservation. The source of our water supplies are the Coconino (C) Aquifer and the (R) Redwall-Muav Aquifer, both of which stretch far beyond the surface borders of our reservation. In addition to water resources, we have substantial cultural resources throughout federal lands in northern Arizona, including special use lands, as noted above, within the Grand Canyon National Park.

Tribal Resources at Risk

1. **Reduction in surface water will increase pressure on groundwater supplies throughout northern Arizona.** As surface water supplies become scarce, there are significant concerns that it will result in water users increasing their use of groundwater supplies. This in turn will place the aquifers that feed Havasu Creek and the seeps and springs throughout the reservation and on our aboriginal lands at risk. Any alternative developed and analyzed must include an assessment of steps taken by the federal and state governments to protect both the R-Aquifer and C-Aquifer from overuse.
2. **Alternatives developed must analyze impacts to cultural resources on our homelands, including within the Grand Canyon National Park and show how such impacts are to be avoided.** Lower river levels and less frequent releases of water from Glen Canyon Dam will have major effects to our cultural resources both in the form of exposing lands that have previously been under water and in limiting the natural processes that have shaped and developed the canyon. Any alternative must include an analysis of the risk to tribal resources in the Grand Canyon on our current reservation lands as well as on our aboriginal lands and the steps that will be taken to mitigate this risk.
3. **Alternatives must include steps taken to limit invasive species in the lower reaches of Havasu Creek.** Less flows will result in warmer water being released to the Colorado River. The warmer water will create conditions favorable for invasive fish species such as the Small Mouth Bass to pose threats to native fish species, such as the Humpback Chub. The Tribe is concerned about the threat that invasive fish species pose to the Humpback Chub that reside in Havasu Creek on the Havasupai Reservation (Reservation).
4. **Lower water levels at Glen Canyon Dam will result in adverse effects on downstream water and air quality.** An example of negative effects to air quality is that lower water levels in the Colorado River can result in exposure and drying of mud, resulting in dirt being picked up by wind and affecting air quality. An example of negative effects to water quality is that the warmer water released at Glen Canyon Dam can cause algae blooms and other adverse effects to water quality. The Tribe is concerned about the adverse effects on water and air quality on the health of Tribal members. All alternatives developed and analyzed must include how these impacts will be addressed.
5. **Lower water levels at Glen Canyon Dam will result in less power being generated and power costing more due to power purchases on the open market.** The Tribe is concerned about the effects of the increased scarcity and cost of power on Tribal

members and functioning of the Reservation. Mitigation for these increased costs must be included in any action that will increase power costs.

The Havasupai Tribe appreciated the opportunity to provide these comments. As you are proceeding with this process, we want to remind you of obligations to consult with the Havasupai Tribe under various Executive Orders before taking action that may impact our resources and we look forward to further discussions with you on these very important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Siyuja Sr.', with a long, sweeping horizontal line extending to the right.

Thomas Siyuja Sr.

Chairman, Havasupai Tribe