



Hattie Johnson, S. Rockies Stewardship
Director
hattie@americanwhitewater.org
395 S 2nd Street
Carbondale, CO 81623
970.456.8533

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 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 Genevieve Johnson,

American Whitewater appreciates the opportunity to provide our comments and perspectives on the scope of alternatives considered in management of Glen Canyon and Hoover Dams in light of extreme low flow conditions. Our membership highly values the Colorado River and its tributaries, particularly as it flows through Grand Canyon National Park. As a result, we have a direct interest in the operation of Colorado River system reservoirs. American Whitewater has engaged in many federal actions affecting the recreation experience and industry in Grand Canyon National Park such as the Long Term Experimental and Management Plan.

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. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. 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 has members that live and recreate throughout the Colorado River Basin. American Whitewater and our members are invested in ensuring that management of the Colorado River Basin is compliant with the Grand Canyon Protection Act of 1992, informed by science and robust public participation, and that the ecological and recreational values of the Colorado River Basin are adequately evaluated in the Supplemental Interim Guidelines.

The Bureau of Reclamation has requested public input on the scope of analysis, potential alternatives, and identification of relevant information or studies to be included and evaluated as a part of the Supplemental Environmental Impact Statement (SEIS) for the Colorado River Basin 2007 Interim Guidelines. We appreciate the steps Reclamation has already taken to protect the system that so many rely on for recreational opportunities, drinking water, power, and food. While this step is needed in rethinking how 40 million people and two countries use the Colorado River, changes to reservoir operations alone will not solve the supply-demand imbalance. Water users will have to match demands to continuously changing supplies. We encourage Reclamation to continue to take steps necessary to keep rivers in the Colorado River Basin flowing. We are concerned that a gradual or incremental approach to adapting to new hydrology will not address the challenges we face and result in the loss of ecological and recreational values of the River.

Our following comments are organized to provide our input on the purpose and need, process we hope to see included as a part of the development of this SEIS, the scope of analysis included, and potential alternatives. Information or relevant studies that may be useful to Reclamation in development of the SEIS are referenced in footnotes below.

Purpose and Need

Reclamation has clearly identified the impending potential for Glen Canyon Dam to reach levels that would not allow for the production of hydropower as early as spring of 2023 and that poses “*unacceptable risks to routine operations of Glen Canyon and Hoover dams*”. The reduced hydrology, over-allocation, and aging infrastructure have already put the environment of the Colorado River at risk. A functioning, healthy river provides important ecosystem services, such as groundwater recharge and resilience against wildfire, and supports a robust recreational industry. The protection of the health of the Colorado River itself, and the important social values it supports, should be included as a part of the purpose and need for the development of this SEIS.

Process

American Whitewater requests Reclamation to incorporate the following into the NEPA process during the completion of this SEIS:

Reclamation should take actions available to protect flows through the Grand Canyon regardless of the timing of this SEIS. This process is butting up against potentially critical reservoir elevations based on Reclamation’s own modeling. We encourage Reclamation to allow robust engagement and process to take place as a part of the SEIS to identify and evaluate management scenarios through 2026. This SEIS process should not be unreasonably sped up at the detriment of robust environmental, social and cultural analysis. At the same time, Reclamation should continue to operate within its power to maintain flows through the Grand Canyon while the interim management decisions are being made.

Ensure targeted outreach to and partnership with a broad range of stakeholders. In addition to creating resources for the general public, meaningful engagement with a broad range of stakeholders needs to be prioritized. Stakeholders should include federally recognized tribes and non-federally recognized tribes, historically underserved communities, recreation and conservation interests, outdoor recreation businesses, outdoor recreation industry experts, and other organizations. Stakeholders throughout the basin, including upstream from Lake Powell should be included in meaningful engagement. Water deliveries from upstream reservoirs as part of Colorado River Basin management have the potential to greatly impact environmental and river recreational values on numerous rivers and river-dependent communities, including the Green River, Gunnison River, Dolores River, San Juan, Upper Colorado and many others. Meaningful engagement is more than simply allowing for public comment and meeting minimum requirements for publication in the Federal Registrar. Meaningful engagement with impacted stakeholders needs to include additional communications, such as press releases, targeted social media advertising, and other print or digital advertising. All materials including public outreach and messaging should provide translations into Spanish in local communities throughout the Colorado River Basin. Again, this SEIS process is understandably fast tracked but that should not be to the detriment of robust engagement will all interested stakeholders.

Tribal water rights and Indigenous Traditional Ecological Knowledge need to be prioritized in all management decisions. 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.¹ 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*.²

Scope

¹ 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>

² 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.

American Whitewater requests Reclamation include the following in the scope of issues being considered as a part of this SEIS:

Impacts on environmental, recreational, social, and cultural values of the Colorado River and its tributaries both upstream and downstream of Lake Powell and Lake Mead must be considered equally to other uses and benefits of the system. Any proposed alternative considered as a part of the SEIS must meet the intent of the Grand Canyon Protection Act of 1992, which requires that Glen Canyon Dam be operated in a way that “protect(s), mitigate(s) adverse impacts to, and improve(s) 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”.³ Any operations need to ensure protection of recreational values into the future. Even short term extreme low flows through the Grand Canyon could irreversibly impact the aquatic habitat while creating devastating economic impacts on the recreation industry that depends on the river. Grand Canyon river running has a significant economic impact on Page, Flagstaff, Kanab, Fredonia, and other portions of the region, through employment, direct outfitting, supplies, equipment, transportation, and lodging. Prior evaluations have dealt principally with the power generation or reservoir balancing implications of dam management. A full valuation of the socio-economic impacts to recreational resources impacted by dam operations is an essential part of the DEIS process when the economic implications of alternatives are examined. Non-use values should also be assessed and incorporated by managers into decision making.

The scope of analysis must include a cumulative impact assessment of 3-5 million acre feet (maf) releases. In Reclamation’s webinar for the public about this SEIS process, the example alternatives discussed showed total releases as low as 3 maf using extreme low flow scenarios (2002-2003 ESP Trace) and in a few instances around 5 maf (all other alternatives). This is a drastic reduction in the annual volume of water historically released from Glen Canyon Dam and the potential for cumulative impacts from those low flows over the next four water years needs to be fully evaluated. Streamflows affect river-related recreation, especially whitewater recreation as is found in the Grand Canyon. Understanding the effects of changes to flow on the recreational experience is important on dam regulated rivers. A study commissioned as a part of the Glen Canyon Environmental Studies program in 1992 identifies the range of flows that provide satisfactory experiences for river trips within the Grand Canyon and describes the impacts on a number of experiences.⁴ As the study indicates, flows below ~10,000 cfs begin to affect the quality of the recreational experience. Flows below 4,000 cfs are considered unpassable to most larger craft and prevent many commercial trips from taking place. The evaluation of alternatives on recreational values must quantify impacts to recreational flow.

Reclamation should coordinate with the National Park Service on presence of boatable flows so NPS can communicate flow impacts to the permit-holding public and commercial rafters. Proposed flows may have an effect on the recreational carrying capacity of the river corridor,

³ Grand Canyon Protection Act. U.S.C. § 102-575 Title XVIII. Section 1802(a). 1992.

⁴Shelby, B., Brown, T.C., and Baumgartner, R. (1992). Effects of Streamflow on River Trips on the Colorado River in Grand Canyon, Arizona. Rivers. Vol 3 Number 3. Pgs. 191-201

which in turn directly impacts the quality of the recreational experience, or have the potential to halt river recreation entirely. Carrying capacity is the basis for launch limits incorporated into the 2006 Colorado River Management Plan (CRMP). It would be important to rely on NPS input in this regard to ensure recreational experiences and values are being upheld.

Protection of healthy ecosystems and recreational opportunities and restoration of impacted areas throughout the basin should be included to create resilience for the system. Functioning rivers and watersheds can provide improvements to water supply, water quality, ecosystem function, and wildfire prevention that can provide wide reaching benefits to the Colorado River Basin.⁵ It is unreasonable to believe that Lake Powell will be full behind Glen Canyon Dam again, therefore the dam cannot function as it was originally designed. The low reservoir levels in Lake Powell have restored or begun to restore sections of the Colorado River in Cataract and Glen Canyons and have resulted in restored rapid and river function. It is important that the protection of these restored reaches of the Colorado River and tributaries should be maintained. Lake Powell should not be filled to inundate these restored areas again.

Potential Alternatives

As stated above, any coordinated operations of Glen Canyon and Hoover Dams must be in accordance with the Grand Canyon Protection Act of 1992 and weigh impacts to the environment and recreation on par with other values provided by dam operations such as hydropower production. The following comments on potential alternatives likely would be incorporated into the Reservoir Operations Modification Alternative as these recommendations are not a part of a consensus-based actions identified by Basin Tribes and States.

Changes to Section 2D as a part of the SEIS needs to include “evaporation and system losses” in the calculations for elevation projections at Lake Mead. This info is used in determining shared cuts in the Lower Basin. Leaving these vital numbers out of these determinations has the potential to further over allocate water in the Lower Basin.

Changes to Sections 6C and 6D should balance releases from Lake Powell to match inflows for Mid-Elevation Release Tier as well as for the Lower Elevation Balancing Tier only until flows through Grand Canyon drop below minimum boatable flows or otherwise adversely impact the values in Glen Canyon Recreation Area or Grand Canyon National Park. Under this alternative, releases from Glen Canyon could be capped at the minimum probable inflows until flows are below boatable (4,000 cfs). When unregulated inflow into Lake Powell is projected to be below 4,000 cfs on the minimum probable forecast, most and maximum probable forecasted inflows should be used to quantify increased releases. The most and maximum probable flow forecasts should also be mimicked to provide for a springtime high flow event annually without yearly approval from the Adaptive Management Work Group.

⁵ Marcus, Felicia. (2022). State Climate Policy and Nature-Based Solutions: A Match That Provides Multiple Benefits for Climate, Water, and More. Stanford University Water in the West Program.

Operations of Glen Canyon dam could better mimic snowmelt induced flows as are typical in the Colorado River Basin. The SEIS should include a direction to operate the dam in a way that includes a spring time high flow, or “runoff”, scenario that would help replenish beaches, provide a high flow recreation experience, and restore the Colorado River to a more natural flow regime. This operation scenario would have impacts on hydropower production. The SEIS should provide a list of alternative electrical power resources to mitigate the lost hydropower should Lake Powell’s elevation drop to a level such that it precludes hydro power generation.

We appreciate this opportunity to provide a perspective and input from the river recreation and conservation community. Please reach out with any questions or concerns. American Whitewater looks forward to continuing to engage on this SEIS process and other longer term planning for the Colorado River Basin. The task ahead is daunting and can only be achieved by thoughtful and open discussion with diverse stakeholders if we are to come to a sustainable path forward. We appreciate Reclamation’s leadership on the task.

Sincerely,

A handwritten signature in cursive script that reads "Hattie Johnson".

Hattie Johnson
Southern Rockies Stewardship Director
PO Box 1540
Cullowhee, NC 28806
hattie@americanwhitewater.org
970.456.8533