Letter #: 819

Date Received: 12/19/2022

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Subject: Comments on SEIS for Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Dear sirs –

In regard to the Supplemental Environmental Impact Statement (SEIS) to the December 2007 Record of Decision entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines), I have viewed the materials related to your Public Informational Webinar per 87 FR 6902, and have the following comments:

1) the Bureau provides a list of anticipated impacts from the No Action alternative, but does not provide a similar list of anticipated impacts for the other two alternatives under consideration. Under either of those two, there would be the potential for significant ecological impacts to Upper Colorado River Basin, the Colorado River through the Grand Canyon, and the Lower Colorado River below Lake Mead. These impacts should be fully considered, and laid out to the public in future such online briefings.

2) On Slide 7 of the informational webinar, there seems to be an error, in that the line indicated as Lake Powell storage actually seems to represent combined Lake Mead-Lake Powell storage (at close to full pools, Lake Mead stores more water than Lake Powell), so the figure as presented does not make sense.

3) For both the Framework Action Alternative and the Reservoir Operations Modification Alternative, the SEIS should analyze the following in detail:

a) The potential near-term and cumulative hydrological, ecological, recreational, and socioeconomic impacts from releasing water out of Upper Basin storage units such as Flaming Gorge, Blue Mesa, McPhee and Navajo reservoirs to supplement storage in Lake Powell.

b) The potential near-term and cumulative hydrological and ecological impacts on the Colorado River ecosystem downstream of Glen Canyon dam in Marble Canyon and Grand Canyon, with consideration of how such impacts might degrade values required to be protected within the National Park system.

c) The potential near-term and long-term impacts to native aquatic species listed under the Endangered Species Act, including possible impacts to their recovery timelines as proposed in current U. S. Fish and Wildlife Service Recovery Plans. These impacts should be assessed independently in the Upper Basin river reaches upstream of Glen Canyon Dam; in the Marble Canyon and Grand Canyon reaches downstream of Glen Canyon Dam to Lake Mead; and in the Lower Colorado River downstream of Lake Mead.

d) The potential near-term and cumulative hydrological and ecological impacts on the Lower Colorado River ecosystem downstream of Hoover Dam.

e) The potential near-term and cumulative recreational, agricultural and socioeconomic impacts along the entire length of the Colorado River basin downstream of Glen Canyon Dam, and in areas served by water currently diverted from the Lower Colorado River Basin (ie., Southern California).

The actions being proposed in the SEIS are significant, and have the potential to cause wide-ranging impacts throughout the Colorado River basin. Therefore, the issues identified above should be analyzed in detail, so that the public can clearly understand the tradeoffs being contemplated.

Dan A. Polhemus
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