Reclamation 2007 Interim Guidelines SEIS Project Manager December 19, 2022
Upper Colorado Basin Region
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Subject: Comment on Notice of Intent To Prepare a SEIS for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations For Lake Powell and Lake Mead by GCPBA.

The Grand Canyon Private Boaters' Association was established in 1996 as a non-profit 501(c3) organization to provide the self-outfitted boating public with an advocate and a clear voice seeking to achieve fair access for the non-commercial river runner in Grand Canyon and the rivers of the Colorado Plateau region. GCPBA's goal is to ensure the ability for all to obtain, on an equal and timely basis, an opportunity to experience a float trip through the Grand Canyon while protecting the resource.

GCPBA coordinates it efforts with the Grand Canyon National Park leadership, American Whitewater Association, Grand Canyon Trust, Grand Canyon River Guides Association, Grand Canyon Commercial Outfitters Association as well as the four private outfitters; Moenkopi, Ceiba, Canyon REO and Grand Canyon Professional River Outfitters. The total economic impact from the private boating community on the Arizona economy is estimated to be $3.4 million based on a 2001 study and adjusted for inflation.

Comment #1

The Purpose and Need section states; "*In order to ensure that Glen Canyon Dam continues to operate under its intended design, Reclamation may need to modify current operations and reduce Glen Canyon Dam downstream releases, thereby impacting downstream riparian areas and reservoir elevations at Lake Mead"* GCPBA challenges the assertion that Glen Canyon Dam should continue to operate under its intended pre-1956 design. The premise that the intended design is inviolate is fallacious. The SEIS needs to address this to have a modicum of acceptance.

Comment #2

It should be made clear in the SEIS that the Western Area Power Administration's interest is to produce and maximize the economics of hydroelectric power and that this intent drives the Bureau's operation of the dam. Hence, the two preliminary alternatives referred to "Framework Agreement Alternative and the Reservoir Operations Modification Alternative" reduce water deliveries so that the generation of hydropower is maintained. These alternatives are based on an interpretation of the "intended design" that generation of hydropower supersedes the delivery water.

Comment #3

It is stated that the analysis in the draft SEIS "*may consider potential effects on wildlife, threatened and endangered species habitat, recreation, water supplies (agricultural, municipal, environmental), water resources, air quality, cultural resources, hydropower resources, social and economic conditions, and other resources and uses*." The SEIS should state that these aspects have been considered in the past and relegated to a lower value than the value attributed to hydropower. To wit, the Long Term Experimental Management Program (LTEMP) for the Operation of Glen Canyon Dam Draft EIS of December 2015. One of the EIS's objectives is to "Maintain or increase Glen Canyon Dam electric energy generation, load following capability, and ramp rate capability, ……."

LTEMPS' preferred alternative maintained a daily fluctuation of flows even though the DEIS concluded that eliminating these has the highest potential for building sandbars and retaining sand in the system and providing the greatest benefit to the aquatic ecology. Furthermore, the creational benefit was found to be enhanced by eliminating these fluctuations. Despite all these benefits, the DEIS' selected alternative ignored the many benefits that could be obtained, at a very small to negligible cost, by eliminating daily flow fluctuations and thereby satisfy the objective of maintaining or increasing Glen Canyon Dam's electric energy generation.

Comment #4

The SEIS should provide a brief historical summary of releases from Glen Canyon Dam whereby the impact on recreational use of the river corridor was deemed irrelevant at the outset of operation. Flows would be reduced to a minimum during off peak hours and maximized during on peak hours. These swings in flows were later reduced to what they are now. This summary should be contrasted with proposed flow reductions for each alternative and the impact on recreational use quantified.

Comment #5

The SEIS should provide cost/benefit analyses of the generation of hydropower in comparison to the cost of reducing water deliveries, the damage done to and degradation of the river corridor's ecosystem by continuing the fluctuation of flows.

Comment #6

The SEIS should provide a list of alternative electrical power resources to mitigate the loss of hydro power should Lake Powell's elevation drop to a level such that it precludes hydro power generation .