



United States Department of the Interior  
NATIONAL PARK SERVICE  
Interior Regions 6, 7 & 8  
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IN REPLY REFER TO:IMDO-RSS-EQ (1248)

Memorandum

To: Bureau of Reclamation (crbpost2026@usbr.gov)

From: Herbert C. Frost, Acting Regional Director, National Park Service, Interior Regions 6, 7, & 8  
Randolph Lavoisier, Acting Regional Director, National Park Service, Interior Regions 8, 9, 10, & 12

Subject: NPS Comments in response to January 2026 Public Draft of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Date: March 1, 2026

The National Park Service (NPS) appreciates the opportunity to comment on the Bureau of Reclamation's (Reclamation) Public Draft of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft Environmental Impact Statement (DEIS). We appreciate the positive working relationship we have had with Reclamation staff and their openness and transparency with this process. This is an important and timely process to address the many challenges related to the sustainable management and future use of the Colorado River.

**NPS Intersection to DEIS Potential Impacts**

The NPS manages and protects resources in nine parks along the Colorado River and associated tributaries that will be impacted by post-2026 operations at Lakes Powell and Mead. These park units collectively contain almost 1,000 miles of river and more than 500 square miles of reservoir surface area.

As legally mandated by the Organic Act of 1916, the NPS mission is to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of current and future generations. NPS policies and additional applicable laws also require the protection of endangered species, archeological resources, paleontological resources, and many other related resources, including recreation and access to NPS units. The 1992 Grand Canyon Protection Act governs the portion of the Colorado River downstream of Glen Canyon Dam and directs the Secretary of the Interior to protect, mitigate adverse effects to, and improve, the natural and cultural resources along the river downstream of the dam. In accordance with Secretarial Order 3426 and Secretarial Order 3434, the NPS must also ensure that all National Park sites remain open and accessible for the enjoyment of the public, as well as strengthen engagement with gateway communities to uphold obligations to support balanced, sustainable use of public lands. Post-2026 operations will also potentially impact areas protected under Sections 106 and 110 of the National Historic Preservation Act, including Traditional Cultural Places (TCPs) and other sites of significance to Tribal Nations, Hoover Dam National Historic Landmark, and the Old Spanish National Historic Trail.

**Park Units Directly Affected by the DEIS Alternatives**

Glen Canyon National Recreation Area (NRA), Rainbow Bridge National Monument (NM), Grand Canyon National Park (NP), and Lake Mead NRA are the park units that will experience direct, and potentially significant, impacts from any alternative selected under this process. These four park units have more than 15 million visitors annually and drive over \$2 billion in regional economic output that supports local communities in Utah, Arizona, and Nevada.

### **Other Park Units Affected by the Powell Infrastructure Protection (PIP) Flows**

Impacts to Dinosaur NM, Curecanti NRA, Black Canyon of the Gunnison NP, Canyonlands NP, and Arches NP are not analyzed in this DEIS but may also be affected if lower levels at Lake Powell trigger Powell Infrastructure Protection (PIP) releases. These releases use varying amounts of water from upstream units, including Flaming Gorge Dam and the Aspinall Unit. These impacts are not analyzed because PIP releases are intended to be constrained by the current Flaming Gorge and Aspinall Records of Decision (RODs). Based on the summary of PIP releases in Appendix O, several alternatives would have much larger and much more frequent PIP releases than have occurred to date. Under drier conditions, this analysis shows that PIP releases under the Basic Coordination alternative may reach 1.1 million acre feet (maf) in volume, almost one quarter of the total cumulative capacity of Flaming Gorge and Blue Mesa reservoirs. These releases could also occur very frequently, potentially in more than 50% of the years. Releases of this magnitude would threaten the resilience of the entire Colorado River system as inflows are unlikely to be sufficient for recovery of multiple PIP releases over the course of a multiyear drought.

This large frequency of PIP releases would also impact the natural river dynamics which have cascading effects on many park resources. Additionally, releases to this extent would be problematic for recreation and regional economics associated with boating at Curecanti NRA and potentially to river rafting in Dinosaur NM.

### **NPS Involvement in the EIS Process**

The NPS is a cooperating agency for this National Environmental Policy Act (NEPA) review and NPS staff have worked closely with Reclamation, USFWS, and USGS Grand Canyon Research and Monitoring Center staff on this DEIS by collecting background information and scientific references, analyzing and modeling alternatives, and suggesting alternative management approaches. Reclamation has made modeling tools available to the NPS and the general public which have allowed for the development of the alternative concepts which we submitted jointly with USFWS in April 2024. We appreciate Reclamation incorporating many of these ideas into the Enhanced Coordination alternative. We also appreciate that many of our past comments (August 2022, August 2023, April 2024, and November 2025) have been addressed or incorporated in a substantive manner. We look forward to continued collaboration with Reclamation as the final EIS and Record of Decision are written.

### **Alternatives that Best Protect NPS Resources and Recreation**

Our comments focus on the effects of the various alternatives under drier conditions (Dry or Critically Dry) when we would expect the highest stress on park resources and user access. These conditions present the greatest challenges to NPS in fulfilling its mission.

The Enhanced Coordination and Maximum Flexibility alternatives would best support the NPS mission by minimizing the negative impacts under drier hydrologic conditions and maximizing the long-term sustainability. Under either of these two alternatives, NPS park units have the highest likelihood of remaining open and accessible for public recreation in accordance with Secretarial Order 3426. These alternatives perform well for continuing motorized boating which is one of the more popular recreational activities that supports surrounding gateway communities at Glen Canyon NRA and Lake Mead NRA. These alternatives are also the most likely to ensure legal compliance with the NPS Organic Act, the Grand Canyon Protection Act, and water and air quality standards on the NPS park units.

#### **1. Enhanced Coordination Alternative**

- Performs the best for supporting the NPS mission into the future under Dry (10-12 maf avg/yr) and Average (12-14 maf avg/yr) hydrologic categories. Modeling shows the least impacts of all alternatives collectively on recreation and resources in Grand Canyon NP, Glen Canyon NRA and Lake Mead NRA.
- Performs best for the protection of native fish (including 92% of the world's federally threatened humpback chub population) by minimizing smallmouth bass entrainment and population growth, as well as cultural resources and camping beaches in Grand Canyon NP.
- Provides the best motorized boating recreational opportunities and protects cultural and paleontological resources, water quality, and air quality (by minimizing shoreline dust impacts) in both Glen Canyon NRA and Lake Mead NRA by maintaining both reservoir levels in the mid-elevation range over time.

- Provides the best protection for the recreational trout fishery in Glen Canyon NRA below the Glen Canyon dam.

## 2. **Maximum Flexibility Alternative**

- Performs well under the Critically Dry (<10 maf avg/yr) hydrologic category. Modeling shows the Maximum Flexibility Alternative has the fewest modeled negative impacts on recreation and park resources for some metrics.
- Under these conditions, the increased shortages of up to 4.0 maf are the mechanism that improves its performance when water supply is critically low.

### **Alternatives with the Most Negative Impacts to NPS Resources and Recreation**

Modeling indicates that future operations under the No Action, Basic Coordination, and Supply Driven alternatives would result in more frequent negative impacts to park resources and user access, particularly under the Dry and Critically Dry hydrological scenarios. Under these conditions and given the lower initial starting conditions for reservoir levels this year, these alternatives would likely result in significant negative impacts, reducing the current park visitation levels of over 15 million visitors/year and the over \$2 billion in regional economic output that the gateway communities rely on around these park units. When water levels drop below the bottom of the motorized boating infrastructure in these park units, it negatively impacts visitor access, small businesses, and commerce in gateway communities. If water levels significantly drop at Glen Canyon NRA, Grand Canyon NP and Lake Mead NRA, the management complexity and costs of addressing all NPS legal obligations will increase concurrently with decreasing park revenues at these park units.

#### 1. **No Action Alternative**

- Performs the worst of all alternatives for NPS mission based on the modeling results. Under Dry-- or Critically Dry—future hydrologic scenarios, both Lake Powell and Lake Mead reservoir levels have a high likelihood of falling below the bottom of the current boat ramps, thus losing the ability to remain open and accessible to motorized boat recreation.
- Modeling also indicates the potential for more significant negative impacts to federally-listed and other native fish based on increased invasive predators; less frequent peak flow processes resulting in loss of beaches for river users and exposure of cultural and paleontological resources in the river corridor; reduced water quality in reservoirs; increases in exposed shorelines that expose cultural and paleontological resources; and increases dust which reduces air quality and may result in public health impacts and recreational closures.

#### 2. **Basic Coordination or Supply Driven Alternatives**

- Under Dry or Critically Dry future hydrologic scenarios, Lake Powell has a high likelihood of falling below the bottom of the current boat ramps, thus losing the ability to remain open and accessible to motorized boat recreation.
- These alternatives would have fewer impacts on Lake Mead than the No Action alternative but would still create significant resource issues at Glen Canyon NRA and Grand Canyon NP including those listed above for the No Action alternative.

### **Potential for States' Agreements and a Hybrid or Modified Preferred Alternative**

The evidence from the modeling in this DEIS indicates that the Enhanced Coordination and Maximum Flexibility alternatives are the alternatives that maximize user access while simultaneously meeting the NPS mission to protect park resources. However, the NPS recognizes that water-use reductions or new conservation mechanisms under most alternatives rely on the seven Basin States developing additional agreements, which have not yet occurred.

Our understanding is that the Basic Coordination alternative may be selected if States are unable to reach an agreement. If that is the case, the NPS urges the States to continue to negotiate and consider incorporating additional reductions and conservation mechanisms into the Basic Coordination alternative for the final EIS.

Modeling suggests that 1.48 maf in reductions may still not be enough, even for a shorter period such as 5 years, to stop the reservoir elevations from falling further, especially given that the initial conditions for reservoir elevations are lower now than what was used in modeling in the DEIS. If States can agree that 1.48 maf can come from reductions from the States alone, and continue negotiations with Mexico for additional reductions, then the total reductions may be sufficient for a five-year period to prevent further decreases in reservoir levels. Incorporation of the Near-Term SEIS section 6e mechanism to allow for annual releases from Glen Canyon Dam below 7.0 maf would also improve the performance of the Basic Coordination alternative, particularly if this mechanism was triggered at the 3525' elevation at Lake Powell to mirror the PIP trigger. Under the Grand Canyon Protection Act and the Endangered Species Act, there may also need to be consideration of continuing mitigations that were put in place under the LTEMP SEIS to address warmer river temperatures that may increase smallmouth bass reproduction below Glen Canyon dam. Consideration of additional constraints on PIP releases would also improve this alternative to minimize impacts in the Upper Basin if PIPs are constrained from happening too frequently or at very large volumes.

If the States are unable to agree on an alternative that performs better at maintaining reservoir levels than Basic Coordination, then keeping Glen Canyon NRA, Grand Canyon NP, and Lake Mead NRA fully open and accessible could become costly and logistically difficult for the NPS. NPS management would be more complex and likely require greater resources to meet legislative mandates. Under the No Action, Basic Coordination, and Supply Driven alternatives all three park units could see significant reductions in annual visitation and associated regional economic output over a twenty-year period.

Sincerely,

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(For) Randolph Lavoisier  
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