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Re: Grand Canyon River Guides' (GCRG) Comments re: the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft EIS

Date: February 27, 2026

To whom it may concern,

Grand Canyon River Guides, Inc. (GCRG) was founded in 1988 to provide a unified voice in defense of the Colorado River corridor through Grand Canyon. Our non-profit 501 (c)(3) educational and environmental organization is made up of over 1,700 river guides and fellow travelers who are dedicated to the preservation of this national icon and all of its precious resources. Without a doubt, the Colorado River is in profound crisis and resolving the supply/demand imbalance is imperative to avert a future human and ecological catastrophe. At this grave inflection point, Grand Canyon River Guides respectfully submits the following comments regarding the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft EIS prepared by the Bureau of Reclamation (BOR).

GCRG recognizes the extraordinary circumstances under which this Draft EIS has been prepared, specifically the lack of consensus amongst the Basin States coupled with the dire hydrologic conditions that drove application of the Decision Making under Deep Uncertainty (DMDU) analytic approach. We commend the BOR in its efforts to explain the potential impacts of a handful of future scenarios absent the essential framework of how water shortages will be accommodated between the Basin States. As a consequence, the BOR is left in a challenging

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predicament acknowledged by its disclosure ‘should a consensus emerge following the publication of this Draft EIS, Reclamation anticipates that such an agreement will incorporate elements or variations of these Draft EIS alternatives and will be fully analyzed in the Final EIS.’ The prospect of any such agreement incorporating elements of this document is optimistic, and perhaps misleading. BOR should expand upon this short but profound statement to explain the criteria under which this DEIS would need to be substantially revised, or re-issued should an agreement be reached and substantive changes be needed.

As the recreational river running stakeholder for the Glen Canyon Dam Adaptive Management Program, GCRG is especially concerned with the future of whitewater boating in the Grand Canyon between Lees Ferry and Pearce Ferry. As part of the analysis summarized in Section TA14 of the DEIS, Figure TA 14-5 paints a bleak picture for motorized travel under the Enhanced Coordination and Maximum Flexibility Alternatives. Simply put, motorized trips would become more dangerous in the future unless the Supply Driven or Basic Coordination Alternatives are selected. We support the continuation of motorized travel as embodied in the Colorado River Management Plan because it offers an alternative means to access the Grand Canyon for large segments of the population who otherwise would never witness firsthand the sublime beauty and awe of the inner canyon. We believe that minimum flows of 8,000 cfs during the motor season from April 1 through September 15 each year are a necessity. Based on our experience, 5,000 cfs is not a “safe whitewater boating threshold.” This DEIS acknowledges serious boating accidents, life-threatening injuries, and damaged equipment that occurred during September 2023 after flows were reduced to 5,000 cfs. (DEIS, TA 14.2.4). GCRG would like to impress upon the BOR that every 1,000 cfs +/- makes a difference for boaters in terms of navigability and safety for the over 20,000 people who run the Colorado River through Grand Canyon each year. Maintaining a robust recreational river running industry in Grand Canyon National Park is also critical to the health of our regional economy.

As an organization, this puts us in a dilemma. While we recognize the necessity of the Basic Coordination Alternative, we are not in favor of continuing the current pattern of overuse and ‘head-in-the-sand’ thinking that underpins the Basin States inability to reach an agreement. And considering our very low starting position in Lake Powell (24.84% of Full Pool, or 3,533 feet in elevation, as of this writing), GCRG is deeply concerned that the Basic Coordination alternative, even in the short term, will not keep the reservoir from falling below 3500 feet. In other words, the 1.48 MAF reduction of the Basin Coordination Alternative is *not sufficient*, and we simply cannot count on getting a good snowpack for several years in a row, especially in light of diminishing inflows due to aridification and other factors. From the inability to conduct High Flow Experiments (HFE) to concerns about non-native fish pass-through and warmer water temps that may lead to permanent changes to resources below Glen Canyon Dam, this alternative is unworkable in its current form and must be adjusted in order to be functional.

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Therefore, should the BOR lean towards this the Basin Coordination Alternative, *even as a short term fix*, GCRG urges more reduction than the 1.48 MAF this alternative specifies, as well as the integration of the 6E stipulation from the Near Term SEIS ROD that reads in part “Reclamation will consider all tools that are available during the interim period to avoid Lake Powell elevation declining below 3,500 feet.”(new section XI, G.6.E.) And in fact, we would suggest strengthening that 6E stipulation to trigger at 3,525 feet rather than 3,500 feet (in other words, please take action more quickly). The Basic Coordination Alternative could also be blended with the Enhanced Coordination Alternative to perform better in the short term.

Similarly, we’re concerned that the Supply Driven Alternative performs poorly compared to the Enhanced Coordination and Maximum Flexibility Alternatives as demonstrated in the likely outcomes of Dry or Critically Dry conditions represented in Figure ES-5. Whether the current hydrologic conditions are described as ‘an unprecedented drought’ or aridification, the Operating Guidelines should give greater consideration and weight to these Dry or Critically Dry conditions because the risks are too great to be unduly optimistic that the ‘drought’ will end.

For GCRG, dead pool at Lake Powell is a non-starter and both the Maximum Flexibility and Enhanced Coordination alternatives do the best at protecting Lake Powell from dropping below 3,500 feet under both climactic scenarios. This is further supported by the conclusions in Table ES-4 which paint a compelling picture. Simply put, only the Enhanced Coordination and Maximum Flexibility Alternatives minimize the risk of our new low precipitation reality while the Supply Driven Alternatives perform the worst. In fact it’s astounding to consider them as reasonable alternatives given that in 18 of the last 24 years – an astounding 75% of the time – there has not been enough water supply to keep Lake Powell from falling off a cliff. This is further supported in the near-term by Table ES-6 which demonstrates that choosing the Supply Driven or Basic Coordination Alternatives would in effect set us up for abject failure by 2031 – the ultimate disservice to the Basin States’ constituents.

Grand Canyon River Guides’ overarching goal of protecting Grand Canyon and the Colorado River experience also leads us to emphasize that *the Colorado River through Grand Canyon is not a pipeline, but a sacred place and living river with complex and interrelated resources and associated values that must be protected in perpetuity*. The legal obligations of the Grand Canyon Protection Act, the Endangered Species Act, the National Park Organic Act, and the National Historic Preservation Act, underpin the Long Term Experimental and Management Plan as part of the Glen Canyon Dam Adaptive Management Program. Ultimately, the ability of this Post D2026 DEIS to conduct periodic High Flow Experiments (HFE) under sediment-enriched conditions for the benefit of downstream resources necessitates retaining sufficient water in Lake Powell. The Maximum Operational Flexibility Alternative and the Enhanced Coordination alternative perform best with respect to geomorphology and sediment. (Chapter 3, p 3-65).

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As an organization, GCRG is caught between favoring an alternative that is best for our specific recreational interests versus an alternative that is best for protecting downstream resources in Grand Canyon, the overall Colorado River system, and over 40 million people relying on the over-tapped Colorado River. Our conundrum exemplifies the many difficult tradeoffs inherent in the Post 2026 DEIS for the Operational Guidelines and Strategies for Lake Powell and Lake Mead. Nevertheless, and with the caveat that the BOR should consider ways to mitigate the negative impacts to recreation to the extent possible (and remembering that there are boaters in the bottom of Grand Canyon who will be directly affected by this new operating plan), we feel strongly that the Enhanced Coordination or Maximum Flexibility Alternatives are the appropriate alternatives despite the fact that the ultimate arbiter will be whatever agreement the Basin States can deliver.

Respectfully,

Lynn Hamilton, Executive Director, Grand Canyon River Guides, Inc.

David Brown, AMWG Member

Ben Reeder, TWG Member

and the Officers and Directors of Grand Canyon River Guides, Inc.

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