



Scott J. Cameron
Acting Commissioner
Bureau of Reclamation: Sent via email to crbpost2026@usbr.gov
March 2, 2026

Re: Post-2026 Colorado River Reservoir Operations Draft Environmental Impact Statement (DEIS)

Dear Mr. Cameron,

On behalf of the National Parks Conservation Association (NPCA) and our nearly 1.9 million members and supporters nationwide, we submit the following comments on the Bureau of Reclamation's Draft Environmental Impact Statement (DEIS) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

Founded in 1919, NPCA is the leading independent voice for national parks. Our mission is to protect and enhance America's National Park System for present and future generations. We maintain field offices across the country, including in the Upper and Lower Colorado River Basin states of Colorado, New Mexico, Arizona, Utah, and California, representing thousands of residents who depend on the Colorado River and value the protection of national parks connected to it.

There are ten national park units affected by Colorado River management decisions—Rocky Mountain National Park; Dinosaur National Monument; Black Canyon of the Gunnison National Park; Curecanti National Recreation Area; Arches National Park; Canyonlands National Park; Glen Canyon National Recreation Area; Rainbow Bridge National Monument; Grand Canyon National Park; and Lake Mead National Recreation Area. Their continued protection is inseparable from river management decisions.

Given the complicated, technical nature of this process along with the lengthy DEIS document and extensive reach of potential impacts to multiple national park units from the management decisions flowing from this process, NPCA is disappointed in the extremely short comment period provided to stakeholders. It is important for the Bureau of Reclamation (Reclamation) to weigh comments from diverse perspectives, including within

the environmental community. However, a month and a half is not nearly enough time for the general public and many stakeholders to adequately review and provide comprehensive comments on a document of over 1,000 pages of in-depth, technical detail.

An overarching concern for NPCA in this process is with the overall reduced runoff and potential for long-term aridification within the Colorado River Basin. That reality coupled with an imbalance in water supply and demand of the Colorado River will intensify ecological and cultural resource degradation leading to significant management challenges across multiple national park units. In addition to diverse cultural and natural resources, the National Park Service (NPS) manages riverine ecosystems and landscapes, not solely ESA-listed species. The Post-2026 Operating Guidelines should therefore analyze broad ecological impacts to affected NPS units and address the threats with the full weight and clarity they deserve.

We outline our specific concerns with the DEIS and recommendations below:

I. Climate Change and Basin-Wide Aridity

The emerging climate reality is a warmer, drier Colorado River basin with less runoff, more evaporation, and increased water quality challenges. Reclamation and the Basin States must move toward certainty and provide for resilient ecosystems, not perpetuate operational systems that rely on emergency actions, unsustainable borrowing from upstream reservoirs, or unrealistic hydrologic assumptions. The Basic Coordination alternative of the DEIS, which will likely be the Preferred Alternative given the Basin States have not come to a consensus agreement, understates the magnitude of climate-driven aridity and the imbalance between supply and demand. None of the alternatives meaningfully positions the system for resilience without substantial, shared reductions across Basin States.

II. Gaps in Purpose and Need Statement and Geographic Scope

The DEIS fails to acknowledge or explicitly discuss the environmental needs of the river system in its Purpose and Need section. In addition, the geographic scope of the DEIS excludes the re-emerging landscapes around Glen Canyon NRA and Canyonlands National Park despite substantial ecological, cultural, geomorphic, and recreational opportunities and challenges occurring in the re-emerging areas. This includes the re-emerging river rapids at the far upper end of Lake Powell and within Canyonlands National Park along with other parts of Glen Canyon NRA such as Cathedral in the Desert, Gregory Natural Bridge, and other important riparian ecosystems. The overall changes—such as a shifting and narrowing river channel, vegetative encroachment, exposed archaeological and cultural

resources, new and changing recreational opportunities and challenges, and the restoration of previously submerged ecosystems —warrant full analysis.

III. Concerns About Modeling Assumptions and Upper Basin Operations

The DEIS excludes an environmental analysis of upstream Powell Infrastructure Protection (PIP) releases from Upper Basin CRSP units, despite the explicit likelihood that these tools could be used frequently under the DEIS’s modeled hydrology. This omission is inconsistent with the reality that upstream operations can significantly affect riverine ecosystems, native and non-native species, sediment transport, reservoir health, and water-based recreation. This puts parks including Dinosaur National Monument, Black Canyon of the Gunnison National Park, Curecanti National Recreation Area, and Canyonlands National Park at greater risk and facing significant management challenges.

Reclamation states that modeling assumptions for Upper Basin CRSP units are not intended to constrain the Secretary’s operational authority. However, the DEIS simultaneously assumes operations will always remain within existing Records of Decision—an assumption inconsistent with anticipated climate conditions and the agency’s stated discretion.

PIP releases are projected in conditions where Lake Powell approaches 3,500 feet. Under DEIS modeling, this could occur frequently, requiring substantial releases from Flaming Gorge and Curecanti. The EIS should analyze the cumulative impacts of near-annual PIP releases, associated water quality risks (including harmful algal blooms) when reservoirs are drawn to low levels, the ecological consequences of consistently reducing future peak flows, and the unsustainable burden this places on Upper Basin water supplies, river channel morphology, recreation, native vegetation and wildlife habitat, and native fish habitat. It is also important for Reclamation to be clear about how any releases that may happen outside of the existing RODs will be repaid to those Upper Basin storage units. If PIP releases are used as frequently as implied by the DEIS, the impacts on many Upper Basin national park units will be significant and long-lasting.

IV. Operational Impacts and Environmental Trade-offs for Grand Canyon National Park and Glen Canyon NRA

According to the Grand Canyon National Park Foundation Document¹, the purpose of the park is to preserve and protect “*the natural and cultural resources and ecological and physical processes of the Grand Canyon along with its scenic, aesthetic, and scientific values for the benefit and enjoyment of the public*”. It exists for many reasons including its

¹ https://www.nps.gov/grca/learn/management/upload/GRCA_OV_2017_508.pdf

incredible geology created by the Colorado River, its diverse wildlife, fish and plant species, and its significant human history. Similarly, the purpose of Glen Canyon NRA is to provide *“for public enjoyment through diverse land- and water-based recreational opportunities, and protects scenic, scientific, natural, and cultural resources on Lake Powell, the Colorado River, its tributaries, and surrounding lands”*². It was established for the values that Lake Powell provides, but also for resources and values in all of the NRA, including the Colorado River and tributaries. It is therefore important to recognize that in determining how to manage the Colorado River within these two national park units, there will be inevitable environmental, cultural, and recreational tradeoffs. It's important for Reclamation to fairly and objectively describe for the public both sides of the tradeoff of what values will be lost at Glen Canyon NRA if Lake Powell is kept higher along with what might be lost at Grand Canyon if and most likely when Lake Powell goes very low. There are environmental, cultural, and recreational values on both sides of that equation and it is important for the public to understand and weigh those tradeoffs.

V. Alternatives Analysis

It is alarming that none of the alternatives presented meet the purpose and need of the proposed action to prevent Lake Powell or Lake Mead from crashing. Nearly every alternative still projects scenarios where Lake Powell and Lake Mead drop below minimum power pool and deadpool. The Enhanced Coordination and Maximum Flexibility alternatives perform the best under dry scenarios but rely on substantial conservation and reductions by Basin States. The Enhanced Coordination alternative maintains higher elevations at Lake Powell, supporting Grand Canyon native fish and high flow experiments. The Maximum Flexibility alternative is more adaptive for rapidly changing climate conditions or long-range planning and more significant reductions during extreme dryness.

The Basic Coordination alternative is not a viable alternative for protecting NPS resources and recreation within the Colorado River Basin national park units. It would trigger emergency reductions along with large and frequent withdrawals from Upper Basin CRSP units, leading to severely degraded Upper Basin ecosystems and NPS managed resources. It would allow smallmouth bass passage into Grand Canyon, threatening the humpback chub population and place the system in the most operationally damaging range for the environment.

VI. Recommendations for Glen Canyon Dam and Infrastructure

² <https://www.nps.gov/glca/learn/management/foundation-document.htm#:~:text=This%20%EE%80%80Foundation%EE%80%81%20%EE%80%80Document%EE%80%81%20has%20been%20prepared>

As Colorado River basin flows continue to diminish, Glen Canyon dam increasingly limits downstream adaptability. NPCA strongly recommends that Reclamation initiate a comprehensive study of Glen Canyon Dam’s infrastructure, including how design constraints may limit operational flexibility under critically low reservoirs. This analysis should incorporate the ecological and cultural importance of Glen Canyon’s reemerging landscapes into modeling and operational decision-making.

VII. Tribal Consultation and Cultural Resource Protection

Given their historic exclusion in the process, Tribes must have meaningful engagement in the analysis of all operational scenarios—including how reservoir fluctuations may affect cultural resources, access, sacred sites, and water deliveries. This would include any analysis related to releases to Upper Basin CRSP units and emerging and changing landscapes around Glen Canyon, Canyonlands and Upper Basin national park units as well as any modifications to Glen Canyon dam.

Conclusion

The Colorado River system is at an inflection point. The EIS must meaningfully address climate realities, ecosystem health, Tribal sovereignty, upstream-downstream equity, and operational sustainability. A future defined by emergency actions, unsustainable reservoir drawdowns, and environmental degradation is unacceptable. Reclamation and Basin States must commit to long-term sustainable management of the Colorado River and its resources. With shared reductions, adaptive operations, and full consideration of ecological and cultural resources, Reclamation, the National Park Service, and Colorado River stakeholders can chart a more resilient path forward.

Thank you for considering these comments.

Sincerely,



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