

NPS response to Reclamation on the 2007 Guidelines 7D report outline

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Fri 5/1/2020 1:11 PM

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In response to the request for input on the Bureau of Reclamation's (Reclamation) proposed approach to the 7.D. Review of the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (Guidelines) Record of Decision (ROD), we are providing the comments below.

We appreciate your engagement with us on this important report given that the dams managed by Reclamation directly or indirectly affect the 1000 miles of riparian corridor through 11 NPS units along the Colorado River and its major tributaries. The Guidelines ROD most directly affects the reservoir and 15 Colorado River miles below Glen Canyon Dam in Glen Canyon National Recreation Area, the 277 miles of the Colorado River through Grand Canyon National Park, and the reservoir of Lake Mead National Recreation Area. The 1992 Grand Canyon Protection Act specifies that the Secretary (and Reclamation acting on his or her behalf) will manage Glen Canyon Dam to protect, mitigate adverse impacts to and improve the condition of the resources and the recreation on the Colorado River downstream of the Dam. We know, from working together with Reclamation as co-leads on the 2016 Long Term Experimental and Management Plan (LTEMP) Environmental Impact Statement (EIS), that annual volumes released from Glen Canyon Dam have a number of significant effects on the vegetation, sandbars and beaches, non-native and native fish populations, cultural resources, and recreation through Glen and Grand Canyon (see the LTEMP cumulative impacts section). Specifically, high annual volume equalization years are known to have increased beach erosion and to have increased rainbow trout recruitment. For these reasons, and because the NPS mission is to protect the resources of the parks in an unimpaired condition, we have a vested interest in the evaluation of the performance of the Guidelines, both past and future. We would like to work closely with you and the staff at Reclamation as a cooperating agency when the new EIS for this process begins.

We understand that in approaching the 7.D. evaluation, Reclamation is planning a succinct report with a narrow focus on water delivery factors and compact compliance issues for which the Guidelines were designed. We understand the need to keep a narrow focus given the number of stakeholders and the many different ways water delivery is viewed throughout the system. We have discussed with Reclamation staff our concerns about assessment of the natural and cultural resources and recreational effects from the Guidelines. Our understanding is that while they may not be the focus of this 7.D. report, there will be a thorough and complete assessment of the impacts to resources as identified in the Grand Canyon Protection Act when the new EIS process under the National Environmental Policy Act is started for post-2026 operating rules. However, we believe it is important to include some level of discussion of resource issues within the 7.D. report that recognizes that resource issues exist and are a concern.

We are very encouraged by the coordination and thoughtful engagement with us from you and the Reclamation staff and the steps that are being taken to prepare for a thorough EIS process. We appreciate the webinars and meetings made available by Reclamation regional leadership and staff and the opportunity to comment on the 7.D. report outline/approach. We look forward to more conversations with you as this 7.D. report progresses. We also look forward to working together with you and our Reclamation colleagues in the near future on the first steps when the planning of the new EIS process begins so we can work collaboratively to develop appropriate and thorough approaches for resource and recreation impact-evaluation in a timely and proactive manner.

Our sincere thanks and best of luck pulling together this difficult report.

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