



December 12, 2022

Ms. Sarah Bucklin  
Project Coordinator, Bureau of Reclamation

Re: Response to the Bureau of Reclamation's "Request for Input on the Glen Canyon Dam/Smallmouth Bass Environmental Assessment"

Dear Ms. Bucklin:

On behalf of American Rivers, thank you for allowing us to provide input on the Bureau of Reclamation's "*Glen Canyon Dam/Smallmouth Bass Environmental Assessment*" as described in a webinar you hosted on Thursday, December 1, 2022.

We appreciate the opportunity to help inform and shape the process for evaluating new Colorado River management strategies and operations to disadvantage smallmouth bass reproduction and vitality after passing through Glen Canyon Dam into Grand Canyon through this environmental assessment under the National Environmental Policy Act.

The risk of smallmouth bass penetrating Glen Canyon Dam poses significant risks to the downstream Colorado River ecosystem. AR appreciates the focus and effort around how to best manage this condition going forward. Unfortunately, this is not the only issue of immediate concern within the Colorado Basin. The 20+ year drought accelerated by climate change is posing problems and creating emergencies in multiple parts of the Basin. As such, it is important for this EA to not be done in isolation. To be meaningful, it should consider how the actions considered will fit within actions being considered under the Drought Response Operations Agreement of 2019 and the most recent investigation under the Supplemental EIS to the Interim Guidelines for Lower Basin Shortages and Coordinated Operation of Lakes Powell and Mead. Only by including and considering the operational activities that will influence the conditions at and releases from Glen Canyon Dam can the EA process fully address the risk of smallmouth bass in a meaningful way.

We also would like to encourage Reclamation to remember that any of the actions contemplated within this EA process should consider and comply with both the Long-Term Experimental Management Plan (LTEMP) under the Record of Decision, as well as compliance with the Grand Canyon Protection Act of 1992.

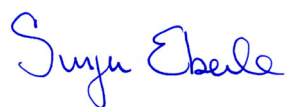
In addition to the alterations and adjustments of flows being contemplated to disadvantage smallmouth bass in the Canyon, we are also concerned about the impacts to other elements of the ecology and ecosystem within the Grand Canyon itself due to the changes in the flow regime that these systems have adapted to over the past 50

years. As such, we would encourage Reclamation to work with and allow involvement on the evaluation of various alternatives from the Grand Canyon Research and Monitoring Center (GCMRC) and the Adaptive Management Work Group/Technical Work Group under the Glen Canyon Dam Adaptive Management Program (GCDAMP.) GCMRC has some of the best, world renowned scientists and modeling experts who could create and model various scenarios pertaining to how elements of environmental resources within the Canyon may be impacted or react to the different proposed alternatives. We are most interested in expertise from a few different categories within GCMRC's current Project Elements, including Project A (Streamflow, Water Quality, and Sediment Transport), Project B (Sandbar and Sediment Storage), Project C (Riparian Vegetation), and Project G (Humpback Chub Population Dynamics.) Additionally, we encourage study of the impacts to water quality in Lake Powell from the potential alternatives, likely through Bridgett Deemer's work via the ad-hoc committee studying water quality in Powell. We feel that GCMRC and AMWG/TWG are best positioned to inform Reclamation of the key resources, impacts to those resources, and possible mitigation strategies related to modifying flow-related operations at Glen Canyon Dam, and that Reclamation should provide ample opportunity for both GCMRC and AMWG/TWG to inform the impact analysis and develop effective mitigation strategies for each alternative presented in the Environmental Assessment.

In contemplating the actual flow alternatives presented by Reclamation, we would like to state our support most notably for Option B: Cool Mix with Flow Spikes, followed closely by Option D: Cold Shock with Flow Spikes. With the body of evidence around how positively impactful High Flow Experiments are to the health of the overall ecosystem within Grand Canyon, especially around sediment transport and sandbar building and maintenance, as well as inhibiting unfettered encroachment of vegetation on sandbars and beaches, we feel strongly that flow spikes must be part of the equation when it comes to determining the most advantages alternative to the ecosystem. Ideally under either alternative, the Flow Spike would be the maximum length possible, as the volume of sand in the system from the past two monsoon seasons would be beneficial to move as far downstream as possible.

We value the opportunity to inform the processes for developing the NEPA analyses for the Glen Canyon Dam/Smallmouth Bass Environmental Assessment. We look forward to working together to inform the actions being considered to confront this challenge in a manner that considers all who are concerned with the future of the Grand Canyon and the fragile ecosystem that thrives within it.

Sincerely,



Sinjin Eberle  
American Rivers Southwest Communications Director &  
GCDAMP-TWG Environmental Representative