



November 3, 2023

Attn: LTEMP SEIS Project Manager
125 South State Street, Suite 800
Salt Lake City, UT 84138

Re: Comments on the Glen Canyon Dam/Smallmouth Bass Flow Options Notice of Intent To Prepare a Supplemental Environmental Impact Statement

On behalf of the National Parks Conservation Association (NPCA) and our 1.6 million members and supporters nationwide, thank you for the opportunity to submit comments concerning the Glen Canyon Dam/Smallmouth Bass Flow Options Supplemental Environmental Impact Statement (SEIS). Founded in 1919, NPCA is the leading citizen voice for the national parks. Our mission is to protect and enhance America's National Park System for present and future generations. We are a national nonprofit with headquarters in Washington, D.C. and 27 field offices across the country, including our Arizona Field Office in Tucson.

Grand Canyon National Park is already dealing with invasive smallmouth bass entering the lower Colorado River Basin through Glen Canyon Dam because of low water levels and allowing warmer water from the upper levels of Lake Powell to pass through the penstocks. The National Park Service (NPS) has done the best it can to respond to this crisis, but ultimately the Bureau of Reclamation (BOR) must take action to remedy this situation as required by the Grand Canyon Protection Act of 1992, as well as a legal obligation under the Endangered Species Act (ESA), to not only prevent smallmouth bass from entering the Grand Canyon, but also from reproducing there.

Grand Canyon National Park should not become an ecological sacrifice zone by allowing current operations to continue under the “No Action” preliminary alternative. Instead, BOR must take the preliminary proposed action to lower temperatures in the Colorado River below the Glen Canyon Dam—this will help reduce the reproductive potential of invasive fish like smallmouth bass that have already managed to enter the lower Colorado River Basin. It is crucial to saving the ecosystem and protecting the native fish species like the humpback chub, which was recently downlisted from endangered to threatened under the ESA because of its successful restoration within the Grand Canyon.

NPCA believes that the preliminary proposed action of reservoir releases with various temperature and flow velocity combinations is the best solution to protect the native fish species and ecology of the Grand Canyon. This mirrors Alternative B: Cool Mix with Flow Spikes from the Draft Environmental Assessment (EA). Cooler water releases have the highest certainty of preventing the establishment of new warm-water invasive fish through lowering the water temperature. This should be done through

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the release of water from the bypass tunnels in combination with the release of water from the penstocks. We understand that the use of the bypasses will have a negative impact on the hydropower production unless modifications are made to compensate for the loss of power. However, both the flow spikes and the use of the bypasses are essential for ecological restoration purposes and protecting the Grand Canyon's critical ecosystem.

In addition, sediment flow and the restoration of beaches should also be prioritized when considering flow spikes or high flow experiments (HFE). BOR has proposed analyzing sediment accounting periods and implementation windows associated with the HFE protocol. The sediment accounting periods should be reviewed and modified to better reflect the reality of the river system, including variation in sediment sources and climate change. For example, accounting periods need to consider and monitor rollover of sediment and reflect changes in seasonal inputs. Sediment-enriched flows are needed to ensure the restoration of beaches, which is important not only for the ecology of the Grand Canyon but for the economy as well. Grand Canyon tourism, including river guides, outfitters, and the 22,000 people who float down the river every year, will all benefit from the restoration of beaches and sandbars along the Colorado River.

Lastly, lower water levels in Lake Powell are the main cause of the issue as they have allowed smallmouth bass to pass through the Glen Canyon Dam. These low reservoir levels must also be restored to higher levels. With projections of increased drought conditions, Lake Powell water levels need to be addressed more broadly and long-term solutions, including passthrough prevention, need to be considered to not only prevent the smallmouth bass from entering the Grand Canyon but to protect the entire Grand Canyon ecosystem. We look forward to ongoing participation in the BOR's National Environmental Policy Act Processes around Glen Canyon Dam and the Colorado River.

Thank you for your work and for the opportunity to comment. We look forward to continued engagement.

With gratitude,

Sanober Mirza
Arizona Program Manager