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BlueRibbon Coalition is a national non-profit organization that promotes responsible recreation and encourages a strong ethical dialogue and individual stewardship of our natural resources. We champion responsible use of public lands and waters by all recreationists through education of their responsibilities and the empowerment of our members to secure, protect, and expand shared outdoor recreation access. We are proud to work collaboratively with governments, natural resource managers and other recreationist groups.

Best Available Science

Drought and declining water levels are cited as the reason for warmer water temperatures which allow non-native species such as smallmouth bass to spawn which then result in competition for the humpback chub. However, the years of declining water levels actually lead to the humpback chub being delisted from endangered to threatened. “Following a review of the best available science, the U.S. Fish and Wildlife Service announced in 2021 that it has reclassified the humpback chub from endangered to threatened under the Endangered Species Act (ESA).”¹ Therefore, warm temperatures should not be a cause of concern for the humpback chub. When

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[https://www.fws.gov/media/humpback-chub#:~:text=Following%20a%20review%20of%20the,Endangered%20Species%20Act%20\(E SA\).](https://www.fws.gov/media/humpback-chub#:~:text=Following%20a%20review%20of%20the,Endangered%20Species%20Act%20(E SA).)

this plan was first created the Humpback Chub was listed as endangered. Water releases should reflect the change in listing as threatened rather than endangered.

BRC has concerns with all the proposed release options. If releases are based on preventing spawning by keeping water temperatures cooler by initiating “triggers” when the water reaches 60 degrees Fahrenheit then we believe these releases will be in vain. Many sources which we have included in Appendix A show conflicting science. Many studies indicate that smallmouth bass spawning can occur in temperatures ranging from 40-80 degrees Fahrenheit. However, if lower water temperatures will in fact prevent spawning of smallmouth bass then the best long term solution will be to keep water levels in Lake Powell higher.

Due to current precipitation within the Upper Colorado River Basin, water levels are predicted to rise within the reservoir which would in turn make the need for these releases due to low levels obsolete. We strongly oppose any prolonged high flow releases through the hollow jets until the reservoir is stabilized at a higher level.

It is also important to note that the Humpback Chub, the native species residing within the Colorado River, spawns best at temperatures above 60 degrees Fahrenheit. If water temperatures do in fact increase, it would only benefit the listed humpback chub species. Ultimately the best option for protecting the Humpback Chub is maintaining a higher lake level. All proposed options would immediately hurt this endangered species for a speculative benefit. Each option degrades the desired habitat for the humpback chub. For this reason, BOR should not move forward with any of the proposed options. We believe the science that justifies any high flow releases to prevent smallmouth bass spawning is weak, and we question whether any of the proposed experimental releases will have the intended effect. Periods of critical, prolonged drought are not the time to be engaging in speculative experiments.

Economic Considerations

BOR should analyze the full impact of recreation opportunities with releases and experimental flows. When developing future plans potential economic loss needs to be considered. BOR should analyze implementing releases that don't cause significant economic damages based on the time of year. Timing of releases can potentially cause hundreds of millions of dollars of economic loss whereas considerations for the reservoirs could accommodate releases and recreational opportunity. In 2022 GCNRA economic output was \$372,677,000.² That is more than \$7 million per week. Releases that cause lake levels to drop for an extra week or two cost

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<https://www.nps.gov/orgs/1207/national-park-visitation-sets-new-record-as-economic-engines.htm#:~:text=WASHINGTON%2C%20D.C.%20%2D%20The%20Department%20of,economy%20and%20supported%20378%2C400%20jobs..>

local communities millions of dollars. Its economic multiplier is 10, giving rise to over \$4 billion in direct economic value to its surrounding and regional areas.

Timing of releases in 2023 negatively impacted marinas, local communities and Navajo Nation tribal communities on the southern border of the GCNRA, as well as Page, Arizona and should be recognized in the deliberations involving these flow options. BRC believes BOR can adequately manage flows while giving proper considerations to all other users and stakeholders.

Conclusion

We recognize that the proposal only contemplates releases consistent with governing statutes and regulations. BOR should at least analyze an alternative that considers holding back more water to raise the lake level to where the temperature of water passing through the dam penstocks would achieve the purpose and need of the proposed action.

We do not support any high flow releases for long periods of time especially during consecutive years of drought and low water levels that Lake Powell is currently experiencing. In 2023, any flow scenario which contemplates high flows from May until July should be rejected.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

A handwritten signature in black ink, appearing to be 'BB' followed by a long horizontal line.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to be 'Simone Griffin'.

Simone Griffin
Policy Director
BlueRibbon Coalition

Appendix A

[Vol. III Ch. 8 Smallmouth Bass.pdf](#)

<https://tforods.com/prespawn-smallmouth-tactics-with-ben-nowak/>

<https://www.gameandfishmag.com/editorial/seasonal-smallmouth-bass-fishing-tips/190243>

<https://strikeandcatch.com/when-do-smallmouth-bass-spawn/>

<https://www.bassmaster.com/how-to/news/spawn-time-smallmouth/> : depth and moon phase

https://www.bassresource.com/fish_biology/smallmouth-seasonal-habits.html

<https://dnr.wisconsin.gov/topic/Fishing/species/smbass.html>

<https://littleriveroutfitters.com/pages/fishing/smallmouth-reproduction.html>

<https://www.tackleshare.com/resources/smallmouth-bass/>

<https://bonfirebob.com/when-do-smallmouth-bass-spawn/>

<https://www.in-fisherman.com/editorial/magic-temps-for-river-smallmouth/156196>

<https://www.northwoodsbase.com/spring-meteorology-and-smallmouth-bass/>

<https://majorleaguefishing.com/angler-columns/kevin-vandam-the-truths-about-water-temperature/>