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Ben Burr, Executive Director

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Bureau of Reclamation
Attn: LTEMP SEIS Project Manager
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Salt Lake City, UT 84138

BlueRibbon Coalition is writing to provide feedback for the Supplementary Environmental Impact Statement for short term management of the Colorado River. BRC 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.

We represent tens of thousands of Lake Powell and Glen Canyon Recreation Area users. Glen Canyon National Recreation Area is a significant national treasure as well as a spectacular producer of revenue. In order to keep water flowing to the Lower Basin users Lake Powell has depleted its storage of water and the level of the lake has dropped to the point that it has at times precluded any recreational (economic) activity on its north end. This began December 2, 2021 and continues to this point in time with only limited operational capabilities. During periods of 2021-2023, its south end was compromised to the point that recreational utilization, and its attendant revenue, almost vanished. While we recognize the importance of water deliveries and

hydroelectric power generation, it is important to recognize the economic benefits of recreation use of these waters is comparable to the economic benefits of the other uses and vitally important to the communities that rely on these benefits. The negative impacts of lost recreation access disproportionately impact Navajo Nation tribal communities on the southern border of the GCNRA, as well as Page, Arizona. BRC supports a modified Alternative 6 – the Non-Bypass Alternative – as it best addresses the concerns of BOR. We also believe that BOR should time releases based on whether lake levels in Lake Powell currently provide access to important amenities on the lake. For example, BOR should delay experimental releases, if doing so would impact access to the Castle Rock Cut. The timing of releases should be taking recreation into consideration. BOR should also not be implementing releases if nests and smallmouth bass are not detected beneath Glen Canyon Dam.

As non-consumptive users, our rights will not interfere with any of the other users of Colorado River water. For 60 years Lake Powell has stood as the guardian and fulfilled its role as a management tool for adequate Basin State water allocation. It is now time to rethink those original policies and include other stakeholders in future policy considerations.

We feel that recreationists have a right to access and use stored water. As a natural resource, water is to be used for the benefit of all of us. It is in the public interest to allow recreational use of our natural resources that leads to no adverse effect or depletion of those assets. Colorado River water belongs to us all and we encourage any move in a direction that enables the benefits of this water to be enjoyed by the greatest number of users.

Economic Considerations

BOR should analyze the full impact of recreation opportunities with releases and experimental flows. In 2023 Glen Canyon NRA had an all time high visitation record of 5.2 million. Economic impact reports from NPS released last year showed that Glen Canyon had lost over \$200 million in economic benefit to the region surrounding the lake during the two years of low water levels. When developing future plans potential economic loss needs to be considered. This is why the timing of releases is so crucial as it could cost GCNRA millions of dollars in economic benefit. In 2022 GCNRA economic output was \$372,677,000.¹ That is more than \$7 million per week. The Bureau of Reclamation needs to consider the full impact of water levels and releases on the economy when selecting an alternative and making a decision. Releases that cause lake levels to drop for an extra week or two cost 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. The low water years at Lake Powell were nothing short of a wipeout that cost

their local economies over \$300 million in two years. We now know that the low-water levels cost the area surrounding Lake Powell hundreds of millions of dollars in direct economic benefit. In 2022, Glen Canyon NRA showed a \$207 million dollar decline. Those numbers are big enough they should be factored into this decision.

In 2019 both GCNRA and Lake Mead generated more economic output confirming that higher water levels support economies. According to the Bureau of Economic Analysis, outdoor recreation boosted the economy by \$1.08 trillion in 2022.² “Boating/fishing was the second-largest conventional activity for the nation at \$32.4 billion”

Conclusion

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non motorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

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,



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² <https://www.bea.gov/sites/default/files/2023-11/orsa1123.pdf>