



Date: March 25, 2024

To: LTEMP SEIS Project Manager, Bureau of Reclamation (ltempseis@usbr.gov)

From: John Dillon, Executive Director, Grand Canyon River Outfitters Association

Re: Draft Supplemental Environmental Impact Statement for the Glen Canyon Dam LTEMP

To Whom It May Concern:

Thank you for allowing us to submit these comments and suggestions on the Draft Supplemental EIS for the Glen Canyon Dam LTEMP, as per the Federal Register notice on Feb 9, 2024.

The Grand Canyon River Outfitter Association (GCROA) is the nonprofit trade association comprised of the sixteen professional river outfitting companies exclusively operating multi-day whitewater rafting trips on the Colorado River through Grand Canyon National Park. Together, we are the only commercially contracted, licensed, and authorized rafting concessioners of the National Park Service in Grand Canyon. We have a long history in the Canyon, for some extending back to the beginnings of river-running, decades before the dam was built. Our river stakeholders are charged with providing these incredible world-class river running experiences in Grand Canyon to nearly 22,000 commercial clients annually. We have a vested interest and keen responsibility to act as caretakers and defenders of all the resources and values that make the Colorado River experience so profoundly unique. We employ over 1000 river guides and support personnel who are considered the very "best in the business". We also proudly represent the river-running industry, which generates tens of millions of dollars per year – a significant economic driver for our region and the state of Arizona, supporting goods, services, and jobs. By way of franchise fees, we also pay the Grand Canyon National Park millions of dollars which directly supports the National Park Service operations each year.

We all recognize that native fish of the Colorado River are under dire threat from the smallmouth bass (SMB) and other non-native species invasion due to lowering lake levels in Lake Powell, which allow this highly predatory warm water fish to pass through Glen Canyon Dam in ever greater numbers and spawn below the dam. If we fail to act immediately, the core population of the federally listed Humpback Chub could be lost, putting the species as a whole in peril of extinction. Scientific evidence has shown that if establishment of the smallmouth bass continues, at a certain point, it could simply be too late to save this emblematic fish that has evolved over the last 3.5 million years. We are also keenly aware of the significantly higher cost burden to try to manage rather than prevent small mouth bass establishment and an associated population explosion.

At the same time, GCROA would like to express our grave concerns about the continued viability of the recreational resources - including the diminishing camping beaches and sandbars along the 277 miles of the Colorado River between Lees Ferry to Pearce Ferry. We share the ongoing concerns of climate change

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and the viability of consistent flows on which our multi-day whitewater rafting excursions can even occur. As passionate stewards of the Grand Canyon, we are the only contracted companies authorized to share this national resource with the general public. Not only do we have very specific contracts which govern our access and operations, but per the Concessions Act, they allow each business the opportunity for a reasonable rate of return on their investment made. These recreational businesses and guest experiences must also be considered in all management decisions as required in the Grand Canyon Protection Act. Large changes to the LTEMP could potentially have unintended consequences causing material changes to the outfitters long-term contracts in place with the National Park Service and Department of Interior. They could also dramatically alter the structure of the Colorado River Management Plan. We urge the Bureau to continuously consult with the National Park Service (GCNRA, GRCA, and LAKE) and the concessioners to ensure this does not happen.

While the Draft SEIS does not specifically designate an agency preferred alternative, we definitely have an opinion on what not to do! The Non-Bypass Alternative has so many fundamental flaws, including potential of flows as low as 2000 cfs, that we strongly oppose this alternative in its entirety. We recognize the complexity of all the proposed alternatives, but in general we oppose any alternative that would limit river flows below 8000 cfs at any time during the commercial rafting season. Any cuts to flows resulting in less than 8000 cfs must be considered only under the most extreme emergency conditions. They should be minimal, temporary, and should require a sufficient advanced notification in order for outfitters to prepare accordingly! Our river trips in mid to late September 2023 were greatly affected when the BOR made radial cuts in flows well below 8000 cfs without sufficient notification. Safety of all stakeholders on the river at all times should be top priority in any action the Bureau takes. Other stakeholders have eloquently explained the many other scientific reasons the Non-Bypass Alternative should not be considered. We won't reiterate them here but agree with all of them!

We support the continued exploration and implementation of the other four experimental alternatives which allow for the maximum flexibility of cool mix or cold shock with flow spikes. These alternatives could also potentially help extend cooler water and spawning disturbance downriver below the Glen Canyon reach. These could be the best, most effective tool for benefitting multiple resources and inhibiting the establishment of smallmouth bass and other non-native invasive species. Naturally timed, cooler water high flow releases can disrupt the spawning of these species - a strategy that has proven effective on the Green River below Flaming Gorge Dam.

By the same token, we caution that especially under low water and sediment depleted conditions, multiple flow spikes may further erode the sediment resource that is key to the health of the Colorado River ecosystem, as well as an absolute necessity for the river recreation industry in Grand Canyon. Therefore, in sediment depleted conditions we urge that flow spikes be as low, short, and few as possible. We also urge that regular monitoring of resource conditions, especially after each proposed flow action component concludes, must be conducted in order to provide the data necessary to ensure that the

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purpose and need of the EIS is being met, as well as the resource goals of the Long Term Experimental and Management Plan, and the mandates of the Grand Canyon Protection Act. The Adaptive Management approach is best, and the decision-making matrix and implementation plan must be based on current science to ensure that proposed actions are actually benefitting resources, while minimizing any adverse effects to the extent possible.

We support the revision of the annual sediment accounting period and High Flow Experiment (HFE) implementation. We are seeing firsthand the severe erosion that can make camping extremely difficult, or in some locations impossible. Abundant scientific evidence supports the use of HFE's as the primary tool for sustaining shoreline habitats for native CRE fish and wildlife, and for rejuvenating recreational sandbars and camping beaches. Natural historical floods occurred during in the spring/summer months, and CRE species and processes are adapted to a springtime flood cycle. We strongly support spring/summer HFE's when trigger conditions are met. We also urge the Bureau to reconsider the membership makeup of the HFE decision-making Planning and Implementation (PI) Team. The PI team should be broadened to include other stakeholders, including representatives of the recreation industry and tribal nations that have previously been excluded from this process.

A river trip through Grand Canyon has the ability to impact people's lives in profound and lasting ways -- a wilderness experience that is unequalled in few places on earth today. Our guests fall in love with Grand Canyon and become lifelong stewards and advocates. Taking the broader view, people all over the world demand that Grand Canyon be protected in perpetuity, whether they have visited the national park or not.

Thank you for allowing us to submit these comments and suggestions. We are so grateful to all those involved for their countless hours and dedication to these efforts, especially all the agency professionals who grind through these issues on a daily basis. As your partners, we stand by willing and able to assist in the process.

Submitted respectfully,

John Dillon – Executive Director
GRAND CANYON RIVER OUTFITTERS ASSOCIATION