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Regional Director  
Bureau of Reclamation, Lower Colorado Region  
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To Whom It May Concern,

Grand Canyon River Guides, Inc. would like to offer our views on the development of management strategies for Lakes Powell and Mead under low reservoir (drought) conditions. Climatic studies of the Colorado Plateau suggest that the drought may continue, on and off, over the next decade. What separates this drought from earlier ones is drastically increased water demand stemming from the huge population influx into the region. We applaud the Bureau of Reclamation for developing shortage guidelines before emergencies occur. Even should precipitation levels return to average amounts, it could take more than a decade of “average” years to refill both reservoirs.

Our diverse organization of over 1,800 individuals is dedicated to protecting the Grand Canyon, setting the highest standards for the river profession, celebrating the unique spirit of the river community, and providing the best possible river experience. Our role as the recreational stakeholder for the Adaptive Management Program, and our sharp focus on the immediate environmental issues of the Colorado River within Grand Canyon National Park and the recreational concerns therein, lead GCRG to submit the following recommendations:

- 1) Regardless of the management strategies adopted by the Bureau of Reclamation pending completion of this public comment process, navigability and boating safety of the Colorado River through Grand Canyon must be ensured. Based on our extensive knowledge of the requisite conditions for safe and successful river trips, GCRG recommends that flow levels not fall below 5,000 cfs at night and 10,000 cfs during the day, while averaging no less than 8,000 cfs.

- 2) South Cove in Lake Mead now serves as the take-out point for many river trips. River guides have experienced difficulties created by river incision and shifting channels in Lake Mead due to low reservoir conditions. Furthermore, extremely low water levels could render the South Cove ramp unusable. Under these circumstances, river trips would be forced to travel significantly farther to Temple Bar, or congestion at Diamond Creek would be drastically increased, resulting in negative impacts to the Hualapai river running enterprise. Stabilizing Lake Mead water levels may lead to a reasonably constant and safer configuration that also benefits the businesses dependent upon this disembarkation point.
- 3) Low reservoir conditions should not impinge upon nor supersede event-driven sediment experiments from Glen Canyon Dam within the parameters approved by the Adaptive Management Program. Sediment is crucial for protecting and preserving: a) endangered species dependent upon near shore habitat, b) irreplaceable archaeological resources along the river corridor, c) camping beaches necessary for continued viability of the Grand Canyon river recreation industry, and d) the natural geomorphic features of Grand Canyon as guaranteed by the National Park Service Organic Act of 1916.
- 4) River restoration and endangered species are key components of the demands placed upon these reservoir systems. This focus must not be lost in the ensuing struggle between Upper and Lower Basin States. The primary mandate of the Grand Canyon Protection Act of 1992 (section 1804) pledges that: *“The Secretary shall operate Glen Canyon Dam...to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use”*.
- 5) Water allotments for all seven basin states should be reduced by the same percentage based on the projected water deficit for each year of drought. Simplicity and equitability can minimize stakeholder conflict.
- 6) Consider options that maximize efficiency of water storage including alternatives that reduce overall evaporative loss to the system. Also, consider ways to maximize power generation and water retention while reducing the need for daily fluctuations.
- 7) Given the realities of continuing drought conditions exacerbated by ever increasing water demands, mandatory water conservation measures are an absolute necessity. Any basin state that successfully implements such measures should receive a pre-determined “water rebate” as an incentive.
- 8) Similarly, any basin state that successfully reduces its peak power demand by distribution to low peak periods or by institution of conservation and alternative energy methods should receive a “water rebate.” This would lessen reliance on environmentally harmful high daily fluctuations and reduce dependence on hydro peaking power during a period of diminishing reservoir levels.

Grand Canyon environmental and recreational issues are widely considered a model for changing demographic challenges to the river system. As our organization's strength, Grand Canyon River Guides' principle focus will remain on the operations of Glen Canyon Dam and its downstream impacts, yet we recognize this is but one critical segment of a much larger river system. Accordingly, GCRG advocates a basin-wide approach in the following majority opinion statement of our membership:

*“The U.S. government should conduct all appropriate and necessary research to compile a full-scale Environmental Impact Statement delineating the impacts of Glen Canyon Dam and its power plant operations on the Colorado River's upstream and downstream resources, including national parks, monuments and recreational areas in its watershed.”*

Initial water allotments set in the 1920s were based on data from what we now recognize as a wet cycle. Nor could policymakers envision the population explosion and societal changes experienced by the American West. The primary concern of our constituency is that the Colorado River through Grand Canyon will be “bled dry” by competing interests. We believe the American public places high value on in-stream flows, whether for recreational, environmental, hydropower, or intrinsic reasons; and additional water should not be taken from the basin to satisfy unsustainable growth of outlying metropolitan areas.

The Colorado River is a system of extremes, yet we stress that *a river without water is not a river*. Grand Canyon River Guides presents our recommendations to this public process in light of this overriding concern. Although the Colorado River Storage Project will continue to endure, all strategies must be examined equally and thoroughly in order to develop a creative and workable solution to the inherent challenges posed by ever-increasing demands on this river system.

Sincerely,

The Officers and Board of Directors  
Grand Canyon River Guides, Inc.