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July 30, 2020

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426

Re: Pumped Hydro Storage, LLC; Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications for:  
**Project # 15024-000 – Big Canyon Pumped Storage Project**

Dear Secretary Bose,

Grand Canyon River Guides, Inc., (GCRG) founded in 1988, is unique in that it provides a unified voice for river guides and river runners in defense of the Colorado River through Grand Canyon. Our non-profit educational and environmental 501(c)(3) organization is comprised of over 1,700 individuals who are passionately dedicated to the continuing preservation of this national icon. Consequently, Grand Canyon River Guides' goals are to:

*Protect the Grand Canyon  
Provide the best possible river experience  
Set the highest standards for the guiding profession  
Celebrate the unique spirit of the river community*

As passionate defenders of the Colorado River through Grand Canyon and the surrounding region, Grand Canyon River Guides respectfully submits our comments in opposition to the above referenced permit application (P-15024-000) for the following reasons:

**Cultural Concerns:**

- This project would be located entirely on Navajo land, yet the developer, Pumped Hydro, LLC, has not consulted with nor received permission from the Navajo Nation, the

Cameron Chapter, local residents who reside near the dam sites, or ranchers with grazing permits in the area. In fact, on June 8, 2020, representatives of the local grazing district voted to oppose the Big Canyon Pumped Storage Project. Without consent of land owners, the developer will not be allowed access to conduct feasibility studies.

- The entire Little Colorado River drainage, of which Big Canyon is an integral part, is a rich cultural landscape, sacred to not only the Navajo Tribe, but also to the Hopi, Zuni, and the other eight affiliated tribes of Grand Canyon. Consequently, *all* affiliated tribes should be consulted on a nation-to-nation basis.
- Petroglyphs, archeological sites, ceremonial practices, and traditional cultural properties could all be negatively affected.

#### **Groundwater, Springs:**

- Since Big Canyon is dry most of the year, the primary source of water for this project is ancient groundwater that would be pumped from three wells sunk into the Redwall/Muav aquifer. This aquifer in turn supplies the seeps and springs that feed the Little Colorado River.
- The Big Canyon Pumped Storage Project would be a terrible waste of ancient water in the hot, dry desert, where every drop is precious and necessary to sustain life.
- The massive amount of groundwater pumped from three wells, the significant evaporation loss from the reservoirs, and the leakage from the fractured rim rock/Kaibab Limestone, could adversely affect the base flow of the Little Colorado River.

#### **Native Fish:**

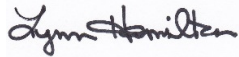
Because of the direct hydrological connection between Big Canyon and the Little Colorado River, there are serious ramifications for native species. The endangered Humpback Chub (HBC) is a native fish endemic to the Colorado River that evolved around 3-5 million years ago. The largest population of this endangered fish is found in Grand Canyon, primarily in the Little Colorado River and its confluence with the Colorado River. Please note:

- The endangered humpback chub spawn in the Little Colorado River where warmer water and suitable spawning habitat is available, while water released from Glen Canyon Dam in the Colorado River is too cold for successful reproduction.
- **Any change to the key conditions of the Little Colorado River (such as flow, temperature, chemical composition, turbidity, etc...) could profoundly affect the recovery goals/plan for HBC by disrupting a spawning population that is critical to the survival of this ancient, endemic species.**
- This permit application fails to include the following relevant “political subdivisions that there is a reason to believe would likely be interested in, or affected by, the application,” namely:
  - U.S. Fish and Wildlife Service
  - U.S. Department of the Interior
  - Bureau of Reclamation

As we have expressed here, Grand Canyon River Guides vigorously opposes the Big Canyon Pumped Storage Project (P-15024-000) because of the profound cultural, hydrological, and ecological impacts to Big Canyon, the Little Colorado River, and ultimately, to Grand Canyon itself. Furthermore, we respectfully request that FERC consider extending the comment period by another 60 days in consideration of the tragic impacts of COVID-19 within the Navajo Nation.

Thank you for your time and consideration.

Respectfully,  
**Grand Canyon River Guides, Inc.**



|                   |                    |
|-------------------|--------------------|
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| Zeke Lauck        | Director           |
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