



May 20, 2025

USBR Upper Colorado Region
Manager, Western Colorado Area
ATTN: Mr. Louis Warner
445 West Gunnison Avenue, Suite 221
Grand Junction, CO 81501

TRANSMITTED VIA ELECTRONIC MAIL TO: lwarn@usbr.gov

Re: Request Resource Management Plan Revision to Allow Seaplane Operations on Navajo and McPhee Reservoirs

Dear Mr. Warner:

At the request of Mr. Wayne Pullan, Director of the US Bureau of Reclamation (USBR), Upper Colorado Region (UCR), and the Colorado Seaplane Initiative (CSI), we the undersigned state and national aviation advocacy organizations respectfully **request that you initiate a Resource Management Plan revision to allow seaplane operations on Navajo and McPhee Reservoirs.**

Collectively we represent hundreds of thousands of aviators and thousands of seaplane pilots and are unified in our request for your reconsideration of seaplane operations on the Navajo and McPhee Reservoirs. We ask that you seriously consider adding these public waters to the thousands of other bodies of water in the US where seaplanes operate safely and responsibly every day.

Seaplanes have been in public service for over 110 years. Allowing them to renew operations on these reservoirs opens the door for a myriad of uses benefiting the non-flying public to include but not limited to firefighting, life-saving search and rescue, emergency transportation, fish stocking, and recreation. Recreational seaplane flying is also enjoyed across our great country and embraced as an accepted and safe form of recreation just as other tax paying user groups enjoy access to our nation's waterways for recreational purposes.

From a safety perspective and through formal training, seaplane pilots are always cognizant of other waterway users and believe in accepting the responsibility for conflict avoidance with respect to other traffic on waterways. Colorado experiences an average of 13.7 boating-related fatalities per year, which is approximately double the annual average of seaplane fatalities ***nationwide***. This demonstrated "accepted" risk tolerance by policy makers regarding boating operations far exceeds the risk that seaplane operations would represent on the same waterways within the state of Colorado. Statistics don't lie and in waterways that seaplanes and boaters operate together, the greatest threat to boaters is the same as those that do not allow seaplane operations – other boaters.

Seaplane pilots also take seriously the very real risks that various aquatic invasive species pose to our Nation's waterways. In fact, the Seaplane Pilots Association has developed a seaplane-specific aquatic [invasive species inspection and decontamination training](#) program that is available to all seaplane pilots and the public. Also, seaplanes represent a tiny fraction—fewer than 1%—of the boating population. Example: Colorado currently has approximately 507,000 registered boats and fewer than 1,000 seaplane pilots and 200 seaplanes, which even without our proactive AIS best practices and protocols being taken into consideration translates to 0.005% of the risk factor posed by the boating community. Even with mandatory boat inspections in place, the potential of a missed aquatic hitchhiker either through evasion of inspections or human error, far exceeds the risk potential represented by a small number seaplane pilots applying similar AIS inspections protocols used to inspect other watercraft.

Despite overwhelming evidence that seaplanes operate safely and responsibly on thousands of our Nation's waterways, seaplane flying is the only recreational activity that USBR/UCR has outright prohibited. The evidence does not support continued discrimination against seaplane operations at Navajo and McPhee Reservoirs and, therefore, we the undersigned request that you initiate a RMP revision to consider allowing seaplane operations to resume on Navajo and McPhee Reservoirs.

Respectfully,



Brad Schuster, Northwest Mountain Region Manager
Aircraft Owners and Pilots Association



Steven McCaughey Executive Director
Seaplane Pilots Association

///SIGNED///

Robert Hackman, Vice President, Government Affairs
Experimental Aircraft Association

///SIGNED///

Adrian Nye, President
Colorado Pilots Association