IG SEIS – WAPA CRSP Comments 11Dec2023

CRinterimops@usbr.gov

Comment 1: Page 3-10 to 3-11 Cumulative Impacts
Cumulative impacts are insufficiently identified and considered for the hydropower resource. One of the most important results that we see from this proposed action is that to keep from going below MPP the reservoir will likely remain lower in elevation (without dropping below MPP) which is good for power directly, however because of the Smallmouth Bass issue, it may result in the reservoir remaining, on average, in a cautionary zone below about 3575" where bypass is likely under BOR's proposed cool mix bypass option. Keeping elevations above MPP creates value in this analysis, but that could then put the reservoir in just the wrong elevation range to result in required bypass under the LTEMP SEIS. This is a critically important concept that should be evaluated and discussed as a cumulative impact and potentially would negate any potential hydropower benefit described. For example, if you keep elevations just above MPP to avoid going below and reduce flows, that would result in a positive economic value in this analysis. However, given what is likely under the LTEMP SEIS that would be below 3575' and have a very high likelihood of requiring substantial bypass amounts for SMB, and thus for hydropower it might be "as if" going below MPP. The only way around this that seems reasonable is an alternative that keeps summer elevations above 3575' and from analyses that WAPA has done on the initial hydrologic data from BOR would eliminate about 90% of the instances of needed bypass for SMB as triggered by temperatures at the LCR.

Comment 2: Page 3-272

Suggest removing the following paragraph as it is not accurate. We do not have a suggested re-write at this time as we are still working to determine what the requirement would be for regulation and reserves:

Remove "At Glen Canyon Dam, flows are required to be approximately 1,000–2,000 cfs above the minimum flows, as outlined in the LTEMP, for ancillary services to continue. As a result, flows must be 9,000–10,000 cfs during the daytime and 6,000–7,000 cfs at nighttime to reliably support ancillary services. The Glen Canyon Powerplant typically holds approximately 40 MW in regulation".

Comment 3: Page 2-249,

The last paragraph under Surcharges and Ancillary Services needs to be revised as it combines various services between Glen Canyon and Hoover, and the language is difficult to understand what the intended meaning actually is. The sentence "Reserves are used to …" is the only sentence we would recommend leaving in of that paragraph that continues into the next page.

Comment 4: Page 3-261, The sentence:

> "For example, the total difference in economic value under typical hydrologic conditions shows the No Action Alternative outperforming the Proposed Action by $8,554,000; this

would only be a 4.8 percent decrease in the annual revenue from the SLCA/IP annual revenue from 2021 (WAPA, 2021)."

Please delete the underlined portion of the sentence as it is inaccurate to say that these changes would result in less revenue, and in this manner. Since CRSP must meet its revenue requirements, this would potentially have rate impacts but would not reduce the revenue, and even if it did affect the rate those values are financial and not these economic values provided. Thus, delete the underlined portion.

Comment 5: Page 3-268, Figure 3-76

This figure is a bit confusing. The Composite rate numbers are correct for no action an proposed action, but under the next two columns, there should only be one set of "difference" values for the whole table and they are repeated and should not be. Perhaps delete the top 4 lines of each difference and percent difference and just leave the bottom 4 lines.

Comment 6: General

A critical analysis that should be added is a better description of how the alternatives would or would not result in bypass by going below MPP and how that affects hydropower. The reason is because that is the primary driver of economic value and downstream impacts, yet being either above or below MPP is a condition that appears lost in the data. There is some treatment of this in Section 3.6 and in Figure 3-6 as a percentage, but what would be helpful is to see the number of instances per year of going below MPP and the amount of bypass volume by year.