



Department of Energy
Western Area Power Administration
Colorado River Storage Project
1800 South Rio Grande Avenue
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June 3, 2024

ELECTRONIC DELIVERY

Russel Callejo
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Dear Mr. Callejo,

Western Area Power Administration's (WAPA) Colorado River Storage Project (CRSP) Management Center appreciates this opportunity to comment on the Bureau of Reclamation's (Reclamation) Colorado River Basin Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (Post-2026) National Environmental Policy Act process. CRSP supports the inclusion of the joint concept alternatives (letter dated April 29, 2024; hereafter JA), submitted by the National Park Service (NPS) and the Fish and Wildlife Service (USFWS), in the Environmental Impact Statement (EIS) for post-2026 operations for Lake Powell and Lake Mead.

CRSP is a WAPA division responsible for marketing power from the CRSP hydroelectric plants and its participating projects, as well as from the Provo River Project and Olmstead Project in Utah, and the Falcon-Amistad Project in Texas. CRSP operates and maintains over 2,300 circuit miles of high voltage transmission lines and related facilities in Arizona, Colorado, New Mexico, Utah, and Wyoming. Glen Canyon Dam is the most significant generating asset within the CRSP system and produces approximately 80 percent of power CRSP markets as part of the Salt Lake City Area Integrated Projects. Reclamation and WAPA operate the CRSP hydroelectric power plants and transmission system according to the CRSP Act of 1956 and related federal reclamation law authorities. This includes the CRSP Act's requirement to operate the project "to produce the greatest practicable amount of power and energy that can be sold at firm power and energy rates," and the mission stated in the Grand Canyon Protection Act of 1992 "to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established." 43 U.S.C. § 620f; Pub. L. No. 102-575, 106 Stat. 4600, at § 1802(a).

When developing alternatives, it is important to also consider the cumulative impacts between this EIS and the Long-Term Experimental and Management Plan (LTEMP) Record of Decision. The Final Supplemental EIS for LTEMP, released on May 30, 2024, analyzes experiments that are designed to be a temporary solution to non-native fish and the threat to the humpback chub. It is critical that the Post 2026 Operational Guidelines consider sustainable solutions to the threat to listed species while fulfilling CRSP Act requirements.

The concepts included in the NPS and USFWS JA include actions to benefit fish and wildlife, hydropower resources, and infrastructure, while maintaining sustainability of the project. The JA addresses the root cause of the non-native fish threat in the Grand Canyon and meets Reclamation's purpose and need statement (9 BOR 2023, 88 FR 7535). CRSP supports including these options when developing alternatives, recognizing the cumulative impacts between this EIS and the LTEMP Record of Decision.

- Target Lake Powell elevation to be at or above 3,570 feet on October 1. The objective is to minimize entrainment of nonnative smallmouth bass through the dam and to reduce the likelihood of warmwater releases. This will help protect downstream populations of threatened humpback chub, avoid unsustainable bypass flows at Glen Canyon Dam for smallmouth bass, and help to avoid the likelihood of going below minimum power pool at Glen Canyon Dam.
- When practicable, manage the system to maintain the Pearce Ferry rapid fish barrier to help prevent non-native fish from entering western Grand Canyon.
- Consider a combined storage approach between Lake Mead and Lake Powell to determine annual release volumes, surpluses, and shortages.
- Revise the annual accounting period at Lake Powell to begin April 1. This will increase certainty in managing release volumes throughout the water year, which is expected to improve the value of hydropower and other managed resources.

CRSP looks forward to working with Reclamation and other stakeholders to develop and analyze alternatives for the Post-2026 EIS process, including the concepts in the JA.

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