



CREDA
Colorado River Energy Distributors Association

December 13, 2022

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts Association

Navajo Tribal Utility Authority
 (also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

CORE Electric Cooperative

Holy Cross Energy

Platte River Power Authority

Tri-State Generation & Transmission Association, Inc.
 (also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
 (also Colorado)

NEVADA

Colorado River Commission of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

UTAH

City of Provo

City of St. George

Heber Light & Power

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

Bureau of Reclamation
 Smallmouth Bass EA
 Project Manager – Sarah Bucklin
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The Colorado River Energy Distributors Association (CREDA) appreciates the opportunity to provide informal comments by December 15, 2022, following Reclamation’s stakeholder meeting held December 1, 2022, addressing Reclamation’s preparation of an environmental assessment (EA) regarding smallmouth bass (SMB) at Glen Canyon Dam (GCD). As a member of the GCD Adaptive Management Work Group (AMWG) and Adaptive Management Program (AMP), CREDA is one of the representatives of contractors who purchase federal hydropower and resources from the GCD, a primary feature of the Colorado River Storage Project (CRSP). CREDA members serve over 4.1 million consumers in the Colorado River basin states of Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming, and represent the majority of the firm electric service customers of the CRSP. As such, CREDA and its members have a unique interest and role in issues associated with Colorado River operations, specifically GCD operations. CREDA and CREDA members Tri-State G&T, UMPA (identified as Known Stakeholders in the SMB EA Project Management Plan p. 9) and UAMPS and SRP (as LTEMP cooperating agency subject matter experts) are prepared to collaborate closely with you as SMB EA project manager and WAPA and Reclamation as federal interdisciplinary agencies, through this EA process.

In response to your request for input on the December 1 materials, as well as information that is important to CREDA and its members and to this EA process, CREDA offers the following and looks forward to working with Reclamation on this important issue and associated processes.

PURPOSE AND NEED

- 1) The draft Purpose Statement as presented is extremely broad. It is not clear what “respond to smallmouth bass” means. Please consider narrowing the statement to be consistent with the Directive from the Secretary’s Designee that begins with “to help prevent.....”.
- 2) The Need Statement includes “various” alternatives. The four proposed alternatives may not be diverse enough to be considered “various” if the alternatives are not capable of providing disruption from Glen Canyon Dam down to the confluence of the Little Colorado River, as stated in the Need Statement.

SCOPE OF THE EA AND PROPOSED ALTERNATIVES

- 3) It is unclear whether this “Targeted/Focused” EA is intended to address threats *only* to Humpback Chub (HBC) or will cover impacts to other native fishes. It is important to understand whether, and to what extent, the

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measures being considered by Reclamation, will also impact other native fishes even if that means expanding the scope of the EA.

- 4) A quantitative analysis of the impacts to hydropower is needed to determine whether they are significant. As indicated on the webinar, CREDA agrees that WAPA should perform the hydropower impacts assessment, which would include hydropower customer impacts assessment, such as they did for the High Flow Experiment EA (as well as multiple EIS processes in the Colorado River Storage Project). As indicated at the beginning of this letter, CREDA and its members who have subject matter expertise in this area are prepared to provide assistance in this specific and unique area.
- 5) The May 2022 Secretary's Designee directive included a requirement to minimize impacts to other resources. None of the presented alternatives include an attempt to minimize impacts to the hydropower resource, as did an alternative presented to the SMB Ad Hoc Group. Yet, on the webinar, it was stated that direction was given to "include flows to benefit sediment." This direction appears to conflict with the purpose and need statement, as sediment is not a resource targeted for improvement or mitigation. Considering the impact on sediment and not other resources seems inconsistent with a "single purpose," or "Targeted/Focused EA, if addressing the impact of SMB on the threatened HBC is the target/focus.
- 6) CREDA would like to understand what screening tools/metrics were used to eliminate a non-bypass alternative? To be consistent with the Directive, and in an attempt to meet the objective of being able to issue a Finding of No Significant Impact (FONSI), at least one alternative that does not include bypass operations should be considered and analyzed. See for example, Alternatives 4 and 5 as described in the November 18, 2022, WAPA correspondence. Finally, the Project Management Plan (p.5) presented to AMP stakeholders on 10/14/2022, directs that a "minimum of four" operational alternatives should be anticipated.

COMMENTS ON THE SLIDE "CONSIDERATIONS FOR DEVELOPING FLOW OPTIONS"

- 7) The "Regulatory/1500 cfs" is related to grid operations. Impacts to grid operations must be considered in analyzing each alternative, and off-ramp/mitigation measures established (see item 12)C. below).
- 8) "Maintenance schedule" and "bypass coating" relate to some of the structural elements of Glen Canyon Dam. The impacts assessment must take into consideration the volume and duration of proposed bypass flows, to assess physical capabilities and impacts to the tubes. The SMB Ad Hoc Group and the Technical Work Group (TWG) have heard presentations regarding scheduling and timing of a specific project to recoat the bypass tubes, and how the original GCD design and current operations do not contemplate frequent or continued use of those facilities. Timing of that maintenance project is just one aspect that must be considered in this EA. Timing, duration, and frequency of flows utilizing those facilities must be analyzed to assess feasibility without undermining the structural integrity of the tubes, and any physical impacts must be mitigated.
- 9) The Secretary's Designee Directive considered the potential of alternatives "outside ROD" operations; but the "Considerations" slide limits alternatives to *within* existing ROD operations. CREDA would like to understand how the determination was made to deviate from the Directive and limit the scope. Disturbance/fluctuations are related to this issue.

From the initial filling of Lake Powell to the early 1990's, pre-ROD flow fluctuations limited rainbow trout (RBT) reproduction to the point that the fishery had to be sustained through stocking. The scientific literature suggests that SMB are more sensitive to flow fluctuations than RBT. This would suggest that daily flow fluctuations like those used during the pre-ROD period could help prevent establishment of SMB in the tailwater and since daily fluctuation waves travel all the way through the Grand Canyon to Lake Mead, they may be more effective at preventing establishment of SMB in the Grand Canyon than trying to reduce release temperatures with bypass. Fluctuating flows (including "outside ROD" levels) should not be discounted or dismissed as being effective to help prevent SMB establishment.

- 10) See comment 1) above – a Goal of the Flow options should be to *help* prevent establishment of SMB. There is no certainty and no actual experience that *any* flow option alone will achieve prevention of establishment of SMB. Hence the need to rapid response actions, as well as long-term strategies and physical treatments (in addition to potential flow treatments). In other words, the EA cannot assume that flows are the panacea.

GENERAL QUESTIONS/RESPONSE TO INPUT SOUGHT:

- 11) CREDA would like to understand the term/duration of the EA. At one point in the webinar, a comment was made that it may need to go into summer 2024. If that is the case, the impacts assessment will likely prevent issuance of a FONSI, based on very preliminary assessment of the GCMRC-developed alternatives presented to the TWG.
- 12) The webinar asked for "things that you think are most important, either positive or negative." The following listing is an initial list of information CREDA has identified at this point, given the brief comment period.
 - A. The CRSP hydropower community is significantly disadvantaged by not knowing how much hydropower generation is going to be impacted BEFORE we have to offer comment. WAPA has provided some analysis but only of the "original" four alternatives presented to the SMG Ad Hoc Workgroup. Since those alternatives have been modified, CREDA's ability to offer quantitative input is inhibited. However, we predict that including a range of alternatives that *all* include bypass operations will result in significant impacts to the hydropower resource and its community of customers. Quantitative impacts analysis is required to confirm (or not) that prediction.
 - B. Alternatives as presented that are tied solely to a temperature trigger of 16 degrees are unworkable. Utilities cannot just have generation removed on short notice when the temperature hits 16 degrees Celsius. A reasonable amount of notice is needed so that utilities can plan for the loss of the generation, particular in resource limited, high demand summer months. Having a defined window and knowing what that window is earlier rather than later is necessary for planning and required to meet customer electrical loads. A significant loss of generation from GCD is likely to have a measurable financial impacts on WAPA and WAPA's customers. WAPA's analysis of the alternatives should be broad enough to quantify the impact of customers having to replace GCD generation with other resources. The analysis should include the impact on those customers that count their CRSP generation toward meeting their resource adequacy requirements, as well as include their CRSP generation in their greenhouse gas and Renewable Energy Certificates (RECs) reporting. Reduced and/or bypassed generation at GCD/CRP has implications and impacts

to both direct contracts of that/those resources as well as exchange agreements that rely on the output of that/those resources. Consideration of resource adequacy requirements, replacement resource availability, and contractual impacts impacting utilities' obligation to serve customers are essential elements that must be addressed in the EA's effects analysis. On September 29, 2022, CREDA submitted comments to Reclamation regarding potential fall experiments under LTEMP. These comments apply to every experiment or changed operation that may be considered for CRSP generating units. This EA, as well as any other proposed operation or experiment considered during the pendency of the LTEMP ROD, must evaluate and consider *hydropower production*, as well as WAPA's assessment of the Basin Fund. (ROD section 1.3).

- C. Section 1.2 of the LTEMP ROD calls out the need for flexibility to address and consider "... hydropower-related issues, adjustments may occur to address issues such as electrical grid reliability, actual or forecasted prices for purchased power, transmission outages, and experimental releases from other Colorado River Storage Project dams." The Western grid faces increasing shortages and reliability risks, particularly during the summer months. The reduction of available hydropower in the Colorado River system during those months further exacerbates those risks and adds related challenges. WAPA's analysis should consider the impact of losing GCD generation on WAPA's ability to transmit power and respond to regional emergencies. In addition, WAPA's analysis should include an assessment on the reliability of the electric grid, including the adequacy of purchased power resources and the potential impact on regional market power prices.
- D. Societal and environmental justice analysis must include the impacts of increased cost and rate increases to CRSP firm electric service customers as they replace bypassed generation on the open market. Impacts to the 53 CRSP tribal customers are unique: Many tribal customers receive the benefit of the federal hydropower through benefit or bill crediting. These customers can use that benefit in a manner determined by the tribe to best suit the community. When that power is not available or reduced, that credit is diminished. This means that tribes may be impacted not only from a financial standpoint, but from a quality-of-life standpoint as well. Operations and experiments that include water bypassing generators exacerbate these impacts.

CREDA appreciates the opportunity to provide comments on the approach for the EA. As our concerns above indicate, the scope of impacts may be significant, thereby triggering the fuller analysis required by an Environmental Impact Statement (EIS). In considering the issues noted above, we encourage Reclamation to consider carefully whether the impacts of the action are significant and an EIS is required.

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Cc: CREDA Board

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