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of Water Resources**

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770 Fairmont Avenue, Suite 100
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November 3, 2023

via e-mail LTEMPSEIS@usbr.gov only

LTEMP SEIS Project Manager
Bureau of Reclamation
125 South State Street, Room 800
Salt Lake City, Utah 84138

Re: Supplemental Comments Provided by the Lower Colorado River Basin States on the Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the December 2016 Record of Decision Entitled Glen Canyon Dam Long-Term Experimental and Management Plan

Dear LTEMP SEIS Project Manager:

The Lower Basin States' Representatives submit the following comments regarding the Bureau of Reclamation's (Reclamation) Notice of Intent (NOI) regarding the preparation of a Supplemental Environmental Impact Statement (SEIS) for the December 2016 Record of Decision (ROD) entitled "Glen Canyon Dam Long-Term Experimental and Management Plan" (LTEMP) published in the Federal Register on October 4, 2023.

Arizona, California, and Nevada, the Lower Colorado River Basin States, have provided comments in a separate letter from representatives of the Seven Colorado River Basin States indicating unanimity in the need for the actions being considered in the SEIS. This letter is intended to supplement the comments included in the letter from the Basin States.

In addition to the comments provided in the Basin States' letter, the Lower Colorado River Basin States request Reclamation analyze a potential term for the nonnative fish flows extending through 2036, the duration of the LTEMP ROD.

As discussed in "Invasive Fish Species Below Glen Canyon Dam: A Strategic Plan to Prevent, Detect, and Respond," a variety of tools are needed to help prevent establishment of smallmouth bass below Glen Canyon Dam and protect the federally listed humpback chub. Should the alternatives prove to be useful in helping to prevent the establishment of smallmouth bass or other invasive fish species, this tool may become a crucial component of adaptive management below Glen Canyon Dam. Analyzing the potential for the experimental flows to continue through the duration of the LTEMP will identify potential benefits and barriers to providing this flexibility and would coincide with the duration of analysis of the amendments to the HFE Protocol. Furthermore, if these experimental flows prove to be effective, completing an analysis for the remainder of the LTEMP period now will likely save time and planning resources later.

The Lower Basin States expect the continued use of the Planning and Implementation Team, which is outlined in the LTEMP ROD and requires discussion and recommendation of each experiment prior to implementation. This process is designed to ensure changes in dam operations are meeting the needs of the Glen Canyon Dam Adaptive Management Program and remain in compliance with existing law.

While the Lower Basin States are requesting the alternatives be analyzed for the duration of the LTEMP, this additional analysis should not come at the expense of completing the necessary work to make these experimental flows administratively available by the proposed spring/summer 2024 deadline.

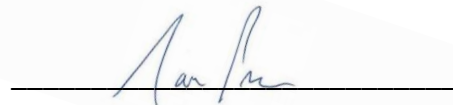
We also recognize these tools may ultimately not fully address the smallmouth bass issue. In the long run, the Lower Colorado River Basin States also encourage Reclamation to address the need for developing a long term, permanent solution over the duration of the Glen Canyon Dam Adaptive Management Program.

The Lower Colorado River Basin States appreciate Reclamation's consideration of these comments and look forward to continuing to work together as the SEIS moves forward.

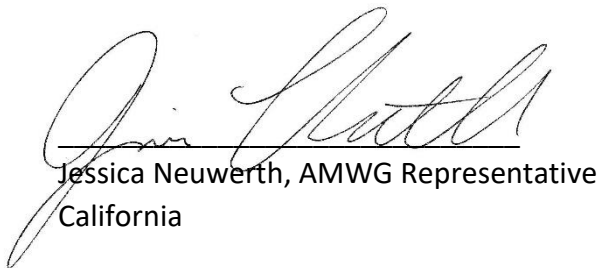
Sincerely,




Clint Chandler, AMWG Representative
Arizona



Sara Price, AMWG Representative
Nevada



Jessica Neuwerth, AMWG Representative
California



Colby Pellegrino, Deputy GM - Resources
Southern Nevada Water Authority