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**COLORADO RIVER COMMISSION  
OF NEVADA**

November 3, 2023

Bureau of Reclamation  
Attn: LTEMP SEIS Project Manager  
125 South State Street, Suite 800  
Salt Lake City, UT 84138

Via Email only – LTEMPSEIS@usbr.gov

**RE: 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 (NOI) – 88 FR 191, October 4, 2023**

Dear LTEMP SEIS Project Manager:

The Colorado River Commission of Nevada (CRCNV) submits the following comments regarding the Bureau of Reclamation's (Reclamation) Notice of Intent regarding the preparation of a Supplemental Environmental Impact Statement (SEIS) for the December 2016 Record of Decision entitled "Glen Canyon Dam Long-Term Experimental and Management Plan" published in the Federal Register on October 4, 2023.

The CRCNV is required to protect and safeguard the State of Nevada's allocation of Colorado River water and power resources granted to it by Congress. CRCNV has a significant interest in water matters impacting the Colorado River as well as hydropower resources from the Boulder Canyon Project, the Parker-Davis Power Project, and the Salt Lake City Area Integrated Projects. The CRCNV provides hydropower from these projects to 23 contractors in southern Nevada including electric utilities, municipalities, educational institutions, Nevada state agencies, and companies that produce goods and services.

The CRCNV has worked closely with our Basin States colleagues to identify and synthesize shared comments. While we have found numerous opportunities for shared comments (see seven Basin States letter), the CRCNV offers the following additional comments concerning the scope of the SEIS.

**Identify operating conditions when bypass for non-native fish control or High Flow Experiments (HFE) should be avoided.** The CRCNV appreciates that Reclamation has incorporated a hydropower flow option that does not include the use of bypass to control invasive species. As Reclamation develops scoping parameters, it is important to recognize that hydropower remains a critical energy resource. Electrical demand throughout the Western Interconnection is rising rapidly due to growth and the electrification of the transportation industry. Utility managers are struggling to keep up with demand due to supply chain constraints that have severely slowed the construction of new resources. During certain times of the year, federal hydropower is needed as a tool to keep the electrical system operating and keep the lights on. Although bypass is one tool for controlling invasive species populations, the CRCNV urges Reclamation to avoid using it when certain conditions are present.

The same can be said for HFE's that are used to distribute sediment. Extending the sediment accounting period and implementation window for HFE's could cause HFE's to be conducted during peak power months which could, at times, have a detrimental impact on the hydropower community and the electric grid.

The scope of the SEIS should identify operating conditions when it is simply inappropriate to use bypass to control non-native species or conduct HFE's because doing so could unnecessarily impair the electric grid or create economic hardship for Western Area Power Administration customers throughout the region. Operating conditions such as declared system emergencies, forecasted extreme weather events, natural disasters in the region, major equipment outages, and extraordinarily high market prices which indicate scarcity of resources are all conditions when using bypass or conducting HFE's may be too impactful to the energy sector and the many communities they serve. The scope of the SEIS should identify the framework for determining when these conditions are present so that the instances of bypass and HFE's can be limited to when those conditions are not present.

**Conduct a robust analysis of hydropower impacts and identify sources of mitigation.** Any loss of hydropower is impactful to the hydropower community even if such impacts last only for a few days or a few hours. Reclamation must fully evaluate the impacts to hydropower from the four bypass flow options and changes to the sediment accounting window.

It is important that Reclamation's analyses of these impacts be as robust as possible and that the analyses be conducted over a wide range of market conditions and operating assumptions. Assumptions about system demand, availability of resources, the magnitude of market prices, variations in market prices throughout the day, etc. will all influence model outcomes and estimates. The CRCNV believes that Reclamation's scoping process should identify the method it will use to conduct the impact analyses and describe the key assumptions underlying the analyses.

In addition to identifying the impacts, the scope of the SEIS needs to address methods of mitigating those impacts either operationally or economically. Whenever WAPA must purchase power to replace resources that are lost due to bypass for non-native fish control or HFE's, these costs should be considered non-reimbursable and should not be borne by WAPA's hydropower customers. Potential sources of funding, other than hydropower customers, should be identified during the scoping process.

**Measure success in the short-term and identify the path forward for the long-term.** The CRCNV appreciates the difficult task that lies ahead and understands that controlling invasive species on the river may be as difficult as controlling the river itself. The CRCNV believes that reliance on any one technique for controlling invasive species populations may prove to be unsuccessful and multiple techniques may be needed in the short-term. The scope of the SEIS needs to include a framework for measuring whether one, or a combination of the flow options identified in the SEIS has been successful in controlling invasive species and include offramps for ceasing experiments if they have not had any appreciable impact on the problem.

In addition, Reclamation should identify the path forward for a long-term solution which can be pursued in parallel with the short-term options identified in the SEIS. At a minimum, the path forward should include a plan for further analysis of long-term solutions, the identification of one or more long-term solutions, and the timeline for implementation. The CRCNV urges Reclamation to begin working on this plan sooner rather than later in the event that the short-term solutions identified in this SEIS prove to be unsuccessful.

Sincerely,



Eric Witkoski  
Executive Director

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