



IRRIGATION & ELECTRICAL DISTRICTS'
ASSOCIATION OF ARIZONA

US Bureau of Reclamation
Attn: LTEMP SEIS Project Manager
125 South State Street, Suite 800
Salt Lake City, UT 84138
LTEMPSEIS@usbr.gov

November 1, 2023

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 (Federal Register Notice, Vol. 88, No. 191, October 4th, 2023)

On behalf of IEDA, we submit the following comments in response to the Notice of Intent published in the Federal Register on October 4th, 2023.

IEDA represents 25 members, 15 of whom hold contracts with the Colorado River Storage Project. IEDA has been in existence since 1962, with a primary purpose of protecting the contracts of its members for federal hydropower.

Based on the nearly 7,000 responses to the draft EA entitled Glen Canyon Dam/Smallmouth Bass Flow Options, it is evident that there is interest in the operation of the dam. But when you review the Public Comment Analysis Report, you realize that the majority of the substantive comments relate to hydropower and how all options presented were limited to flow alternatives that negatively impacted hydropower generation. Therefore, we appreciate the inclusion of the non-bypass flow alternative in the LTEMP SEIS.

IEDA remains concerned with the lack of scientific support present in the draft EA regarding the use of flow spikes or cold-water releases for non-native fish disruption. We expect that proper rationale will be included to justify any selected alternative, especially one that negatively impacts hydropower,, especially considering the LTEMP's charge to maintain or enhance hydropower production to the greatest extent practicable....

In response to the "Need", the stated "Purpose" should be expanded beyond only flow actions to address short, mid, and long-term needs. The Invasive Species Strategic Plan approved by the Adaptive Management Work Group at its February 2023 meeting should be used in development of the SEIS.

There are multiple “tools” to consider in the prevention of non-native fish establishment downstream of Glen Canyon Dam. These include not only temperature modification, but fish curtains, disturbances, scouring, etc. Certain areas, like the -12 mile slough, should also be permanently modified to eliminate a warm water area ripe for non-native fish establishment. These actions should ultimately be included in the LTEMP SEIS, in addition to the flow actions.

Included in the NOI is consideration of adjusting the sediment accounting period to allow for more Spring High-Flow Experiments. While the current sediment accounting period has not resulted in Spring HFEs compared to LTEMP projections, how would this assist in non-native fish disruption? Could HFEs actually increase the risk to humpback chub by transporting predatory non-native fish into their habitat? Has the AMWG ever investigated the effects of HFEs on non-native fish transport downstream into humpback chub habitat?

The SEIS should consider the use of reservoir elevations to address temperature concerns, as opposed to only flow actions. Given recent hydrology and forecasted “El Nino” precipitation, the lake elevation could rise enough in 2024 that that the penstocks could be drawing colder water from below the epilimnion, where fish tend to reside.

Regarding impact analysis, the SEIS should use current replacement power pricing. There was insufficient documentation included in the EA to allow the public to understand the impacts of the proposed alternatives. The SEIS must disclose financial and economic impacts to federal hydropower contractors, as well as WAPA and the Upper Colorado River Basin Fund.

Colorado River Storage Project customers have seen the impacts of drought on Western Area Power Administration (WAPA), but the Western Interconnection includes more than just WAPA. It is forecasted that drought in the Pacific Northwest will reduce the nation’s hydropower generation by 6% this year. An abundance of hydropower generated from the Northwest is exported into WAPA’s territory. The lack of Northwest hydropower will put upward pricing pressure on an already scarce resource. The SEIS should analyze scarcity pricing based on reduced availability and recent market disruptions due to weather events. Bypass flows will further endanger the stability of the regional grid and prevent Glen Canyon Dam from responding to emergency operations requirements if called upon.

Given the disruptive events that have occurred since the LTEMP was completed, a cumulative effects analysis should be included in the SEIS.

Sincerely,

A handwritten signature in blue ink that reads "Ed Gerak".

Ed Gerak
IEDA