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October 31, 2023

Bureau of Reclamation  
Attn: LTEMP SEIA Project Manager  
125 South Street, Suite 800  
Salt Lake City, UT 84138  
Via Email only – LTEMPSEIS@usbr@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 FR191, October 4, 2023

**Wyoming Municipal Power Agency (WMPA Member Interests)**

Wyoming Municipal Power Agency (WMPA) appreciates the opportunity to comment on the NOI that was issued on October 4, 2023.

**WMPA's Members and Customers**

WMPA is a not-for-profit entity, that was formed to provide cost-based wholesale power to the municipalities of Cody, Fort Laramie, Guernsey, Lingle, Lusk, Pine Bluffs, Powell, and Wheatland. These rural communities serve 24,000 Wyomingites.

Inflation has negatively impacted every household in America. Rural areas, which often have no public transportation available, have been disproportionately impacted by the enormous increase in the cost of fuel. As a result, the retail customers that WMPA serves are already facing financial challenges.

WMPA is a Colorado River Storage Project (CRSP) customer. WMPA uses the power from CRSP and other sources to serve its loads. Glen Canyon Dam (GCD) comprises approximately 80% generation of the CRSP contract.

### **Purpose and Need**

The Purpose and Need statements and the Proposed Action should be broadened to address short-term, medium-term, and long-term prevention and management of the Small Mouth Bass population. Using only flow actions doesn't seem comprehensive enough to address the need.

### **Alternatives for Consideration**

Chemical treatment and electrofishing were used in 2023 to prevent establishment of the SMB. Yet, the SMB population grew. Thus, considering other options seems prudent.

The slough has been an issue for several years and has proven to produce significant numbers of green sunfish, and current monitoring for SMB appears to show that this non-native invasive species is following the trajectory of the green sunfish. This summer, the SMB population in this area grew significantly. Addressing the slough seems like a wonderful opportunity for controlling non-native fish populations.

Physical barriers should also be considered as a long-term solution.

### **Other Serious Impacts Should be Considered**

#### **1) Grid Reliability Concerns**

Dispatchable generation, such as coal, hydro, nuclear, and gas, keep the power grid reliable. Dispatchable generation must equal non-dispatchable generation, such as solar and wind, minus customer usage. When there is not enough dispatchable generation on the grid, customers' power is turned off to maintain the frequency, which is necessary to keep the grid interconnected.

The American people depend on electricity. Most people do not have alternative methods to supply the water that they need, manage their sewage, or keep their food safe without electricity. In addition, the heat in the southwest can be so extreme that human life can be at risk without air conditioning.

In September 2022, California once again called upon the generation at GCD for an electricity emergency. Without GDC, many Californians may have suffered harm.

Removing dispatchable generation is a very serious concern.

**2) Financial Impacts to other users of the Colorado River/Glen Canyon Dam**

Primary users of the system may be negatively impacted by the alternatives that are considered. These impacts should be clearly identified and mitigated. Please keep in mind that this is a multiple purpose, shared resource and the alternatives need to consider the impacts to all users as work is done to mitigate the SMB population.

Respectfully,

A handwritten signature in blue ink that reads "Rosemary Henry". The signature is written in a cursive style.

Rosemary Henry  
Executive Director

Cc: WMPA Board