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*City Attorney*

ROB PATTERSON

March 13, 2024

Sent Via Email only – [LTEMPSEIS@usbr.gov](mailto:LTEMPSEIS@usbr.gov)

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

Subject: GLEN CANYON DAM LONG-TERM EXPERIMENTAL AND MANAGEMENT PLAN (LTEMP) DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (DSEIS) – 89 FR 28, February 9, 2024

On behalf of the Manti City, we appreciate the opportunity to provide comments on the DSEIS, issued February 9, 2024. In addition to our comments, we support and agree with the comments presented by Utah Municipal Power Agency (UMPA). Our city is one of the six member utilities of UMPA. We also agree with the comments and concerns submitted by the Colorado River Energy Distributors Association (CREDA).

Manti City operates a not-for-profit municipal electric utility serving over 1,400 residential and commercial customers. We aim at providing reliable, affordable, and sustainable electrical service to our citizens. Our electric utility is a critical driver in promoting the economic welfare of the community.

By contract with Western Area Power Administration (WAPA), we receive over 20% of our power resources from these federal facilities. Any cost increases or power reductions have a significant impact on our community. This clean and renewable hydroelectric energy supports our efforts to meet our carbon-free and renewable goals in the community. Over the past years, we have been impacted by drought conditions in the upper Colorado basin leading to lower energy production and higher costs.

The DSEIS acknowledges that power generated through Glen Canyon Dam would need to be replaced and lays that responsibility onto WAPA for solutions. However, it does not address and considers the scarcity in energy generation faced by utilities. We express serious concerns regarding the draft SEIS's failure to sufficiently analyze the impact that the flow options will have on hydropower production and the risk that reduced hydropower production may have on

the ability for utilities to provide power to the Utah region during the summer. Currently the energy market is being strained and a further reduction of hydroelectric generation will add to constraint energy market with scarcity and higher prices. The DSEIS fails to reflect impacts in our market area and only examines the Palo Verde trading hub.

We acknowledge the importance of protected species and recognizes the risks associated with smallmouth bass (SMB) proliferation in the river reaches below Lees Ferry. Many years of good science and multi-millions of dollars have been invested in protecting endangered fish species and improving the habitat of the river. Although Reclamation has well intention in drafting the SEIS, it has been rushed and lacks a thorough and comprehensive examination of other alternatives other than use of the bypass tubes. Maintaining a higher elevation in Lake Powell should have been examined.

We recognize the challenge for Reclamation in balancing the priorities and complex issues related to operating the dam. We do support these efforts to address the interests of protecting the hydropower resource in balance with other social, cultural, tribal, and environmental purposes. We strongly urge further studies to avoid reduction of hydropower generation and the impact to reliability and affordability in the region. In summary, we urge you to adopt the "None-Bypass Option" to avoid these significant risks to power supply.

Sincerely,

A handwritten signature in black ink that reads "A.C. Bigelow". The signature is written in a cursive, flowing style.

Alfred C. Bigelow  
Mayor  
Manti City

Cc: Layne Burningham, UMPA  
Kevin Garlick, UMPA