



April 1, 2024

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

The City of St. George Energy Services Department (SGESD) appreciates the opportunity to provide comments on the DSEIS issued on February 9, 2024. SGESD, a municipal utility since 1942, serves approximately 35,000 meters. Our customer base includes residential and commercial customers. SGESD has received power from the Colorado River Storage Project (CRSP) since 1966. The power rates assessed for energy from CRSP include the cost of funding environmental projects and experiments including a longstanding participation in the Upper Colorado River Endangered Fish Recovery Program.

Through our membership in the Colorado River Energy Distributors Association (CREDA), St. George has participated in all NEPA processes associated with LTEMP and DSEIS. It is our position that the DSEIS is legally inadequate to allow the decision maker and the public to understand what is proposed or to make a reasoned choice among alternatives. The DSEIS should be revised to include ALL necessary information and analyses and reissued for public comment prior to issuance of a final SEIS, Record of Decision, or Implementation of any experiments.

The fundamental premise behind the proposed action is based on the smallmouth bass data and models. Although data has been collected it has not been analyzed. The DSEIS states “(s)pecific data on these fish have been collected but are not available or citable at this time” (p.3 -68). Based on the relationship and hypotheses related to smallmouth bass, humpback chub and temperature, it is important that the tools used to analyze impacts and make decisions be linked with the results disclosed in the DSEIS. It is critical that a technical review of the preliminary model and the assumptions is done prior to issuance of the final SEIS.

SGESD appreciates the opportunity to provide comments and also urges Reclamation to update and reissue a public draft SEIS. Given the potential direct and immediate impact of actions

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being considered in the DSEIS to CRSP electric service customers, SGESD supports CREDA's recommendation that all LTEMP Cooperating Agencies be afforded the opportunity to participate in any decision-making/recommendation process associated with actions under this DSEI. SGESD supports the comments from both CREDA and UAMPS.

Sincerely,



Michele Randall, Mayor

