



March 25, 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

Heber Light & Power's Interest in LTEMP DSEIS:

Heber Light & Power (HL&P) is a community owned Utah Services Interlocal Agency, and a Colorado River Storage Project (CRSP) preference customer with a vested interest in issues associated with Colorado River and CRSP operations. Our CRSP allocation provides power to 15,000 rural customers in Wasatch County. For our customers, access to affordable and reliable electric service is not merely a convenience but a critical necessity for their health and safety. CRSP accounts for 30% of our energy mix, making it our most significant source of power. Consequently, any alterations to the CRSP resource directly influence our electricity rates.

HL&P Supports CREDA and UAMPS' Comments:



As a member of the Colorado River Energy Distributors Association (CREDA) and of Utah Associated Municipal Power Systems (UAMPS), Heber Light & Power supports the comments submitted by UAMPS and CREDA. HL&P emphasizes the following points:

1. **Description of Alternatives:** The alternatives proposed in the Draft Supplemental Environmental Impact Statement (DSEIS) are too narrow and should incorporate a broader range of strategies beyond flow adjustments to address the establishment and management of smallmouth bass below the Glen Canyon Dam. Alternatives should not be specifically focused on flow actions alone, which are insufficient to prevent the establishment of SMB below Glen Canyon Dam. A broader set of alternatives, including structural measures, is deemed necessary to effectively address the issue. Alternatives should include structural elements and actions outlined in the Invasive Species Strategic Plan, while also emphasizing the need for comprehensive experiments with clear descriptions, hypotheses, benchmarks, and monitoring to assess impacts on threatened species and the electrical grid, as part of the Long-Term Experimental and Management Plan (LTEMP).
2. **Financial Impacts to CRSP Customer:** The DSEIS's effects analysis must include the financial and economic impacts on CRSP customers who are obligated to provide reliable electricity. The impacts are distinct from those of the Upper Colorado River Basin Fund and WAPA, therefore these impacts should be disclosed, and if possible, mitigated. As hydropower continues to be less available and reliable, HL&P is forced to seek replacement power which comes at a high cost and increases the negative environmental impacts of drought on our customers.

Reductions to CRSP hydropower production are detrimental to HL&P's customers, and reductions during the summer months are especially impactful to our rates and reliability. As a small public power utility, we operated with a lean staff and budget which makes it especially difficult to economically replace CRSP power.

Financial impacts to the Upper Colorado River Basin Fund (Basin Fund) and the programs it funds must be assessed and disclosed. Operations of hydropower are not the cause of the invasion of SMB and should not be burdened with the costs of mitigation measures. If WAPA is required to buy power to compensate for resources that are unavailable or lost due to operations aimed at controlling non-native fish or High Flow Experiments (HFEs), these expenses should not fall upon WAPA or its hydropower customers.



- 3. Energy and Power Impacts:** HL&P echoes CREDA's concerns about the adequacy of the DSEIS's analysis of power and energy impacts. CREDA emphasizes the need for a more detailed and accurate assessment of the effects on power generation, electricity rates for utility entities, and overall system-level electricity production costs. This includes the impact of experiments on replacement power and grid reliability, especially during the summer months.

Sincerely,

Jason Norlen

Heber Light & Power

General Manager