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Bureau of Reclamation  
Attn: LTEMP SEIS Project Manager  
125 S State, Suite 800  
Salt Lake City, UT 84138  
[LTEMPSEIS@usbr.gov](mailto:LTEMPSEIS@usbr.gov)

**Re: Comments to the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) Draft Supplemental Environmental Impact Statement (DSEIS)**

The Roosevelt Irrigation District (RID) appreciates the opportunity to provide comments on the important issues in the DSEIS. The RID provides electric service to customers in Maricopa County, Arizona west of Phoenix. RID is a long-time Firm Electric Service contractor with Western Area Power Administration (WAPA) for capacity and energy provided by the Colorado River Storage Project (CRSP). RID endorses the breadth of comments submitted by CREDA, IEDA and SRP.

The limited view of the impacts of the alternatives are disappointing. The DSEIS must be revised to consider accurate evaluations of a wider range of solutions to prevent the establishment of smallmouth bass and other nonnative warm water invasive fish. The DSEIS omits reasonable alternatives that could disrupt the establishment of smallmouth bass below GCD without flow modifications that diminish GCD electric generation. More critically the DSEIS fails to adequately assess the environmental and public safety effects that the alternatives will impose on the ultimate electric customers that are served from this resource.

The DSEIS does not consider non-flow alternatives to disrupt smallmouth bass populations, rather it leaves this analysis for future NEPA actions. Such non-flow options have already been identified by IEDA, SRP and the GCD Adaptive Management Work Group. This narrow focus of alternatives indicates a bias for a particular outcome.

The DSEIS analysis does not properly evaluate the impacts to electric generation. The costs of the replacement power and transmission are grossly underestimated and the proposed flow modifications will directly impact reliability. Loss of delivery to our communities due to

reliability issues will threaten public safety. The costs of the flow-based alternatives need more rigorous analysis.

Reclamation must critically analyze available alternatives to disrupt smallmouth bass populations below GCD include nonflow options. The inclusion of one non-bypass flow alternative is insufficient to fully address the requirements of an EIS. More critically the DSEIS fails to mitigate the effects on regional grid reliability caused by the loss of GCD generation or the costs of replacement power and transmission. Please revise the DSEIS such that it meets all applicable requirements.

Sincerely,



Donovan L. Neese  
Superintendent