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Bureau of Reclamation  
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**RE: Environmental Protection Agency, Environmental Impact Statements; Notice of Availability; EIS No. 20240024, Draft Supplement, BR, UT, Glen Canyon Dam Long-Term Experimental and Management Plan – 89 FR 28, February 9, 2024**

The Salt River Project Agricultural Improvement and Power District (SRP) appreciates its long history of cooperation with the U.S. Bureau of Reclamation (Reclamation) and Department of the Interior (DOI) on a wide variety of issues, including its Cooperating Agency status with Reclamation and the National Park Service on the Glen Canyon Dam (GCD) Long-Term Experimental and Management Plan (LTEMP) draft Supplemental Environmental Impact Statement (DSEIS). SRP is a community based, not-for-profit organization, providing affordable, reliable water and power to over two million Arizonans. SRP holds a long-term firm electric service contract for Colorado River Storage Project (CRSP) hydropower and an exchange agreement with Western Area Power Administration (WAPA) that relies on sufficient generation at GCD to facilitate the energy exchange.

Reclamation issued the LTEMP DSEIS on February 9, 2024.<sup>1</sup> SRP acknowledges the importance of protected species and recognizes the risks associated with smallmouth bass (SMB) and other non-native fish proliferation in the river reaches below Lees Ferry. However, SRP believes strongly that alternatives other than flow modification should be considered. Furthermore, the DSEIS does not include all necessary information and analyses to allow the public a full and transparent view of the potential impacts of the proposed experimental flows on GCD hydropower operations and resultant costs and reliability impacts to SRP and many other federal preference power contractors in the West who rely on GCD hydropower as part of their overall portfolio. GCD plays an integral role in grid reliability, and the proposed flow options create a critical concern that the same level of reliability, particularly at summer peak conditions, will not be maintained.

Flow Alternatives and Experiment Metrics

Generally, this proposal to manage non-native aquatic species below the Dam is not the first of its kind. Deliberations on impacts of non-natives on humpback chub populations have occurred repeatedly, including relating to rainbow and brown trout, green sunfish, and most recently here with SMB entrained through GCD. Further, it is not the first review of tailoring releases to disadvantage these species or advantage humpback chub.<sup>2</sup> However, previous flows were expressly contemplated and analyzed in the

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<sup>1</sup> [Federal Register/Vol. 89, No. 28/Friday, February 9, 2024/Notices](#)

<sup>2</sup> See generally Trout Management Flows, low summer flows (to achieve warmer river temperatures), and low steady weekend flows (“bug flows,” to test whether the flows increase insect abundance and improve the aquatic food base).

context of a comprehensive management and mitigation plan: in the LTEMP process and in the 2019 Expanded Non-native Aquatic Species Management Plan,<sup>3</sup> among others. These analyses included gathering robust datasets and establishing comprehensive control actions and conservation measures based on tiered, metric-driven triggers, in addition to flow actions. While first considered by the Glen Canyon Dam Adaptive Management Program (GCDAMP) in its “Non-native Fish Strategic Plan,”<sup>4</sup> which proposes such a paradigm, scrutiny of these experimental flows stands alone in this DSEIS.

Given the proposed flows are experiments,<sup>5</sup> metrics should be assigned to determine their effectiveness. To fully inform the analysis of their effects (direct, indirect, and cumulative), experiments must include a *description of the proposal*, its implementation *time or frequency*, and *triggers or other conditions that must be met prior to implementation*. They must also include a description of *hypotheses that will be tested and benchmarks or other identifiable criteria* that will allow the Secretary and interested parties to assess the experiments’ *success (or lack thereof)*, and *when an experiment or action must be terminated because of specifically defined unacceptable impacts* to the threatened humpback chub or other legally protected resources. The experiments also fail to describe *any* monitoring included in an implementation plan or experimental design, which is paramount to the LTEMP’s principles of adaptive management. The Description of Alternatives (Chapter 2) should be revised to include these elements.<sup>6</sup>

Under these experimental releases, flow changes and decreased temperatures may make some habitats less favorable for spawning. However, fish by nature will seek other habitats to spawn; as temperatures become disadvantageous, SMB will move, as would any species, to find suitable habitats. There are many backwater/off-channel areas other than the -12 River Mile (RM) slough that would provide spawning opportunities. These flows may push smallmouth (and other non-native warm water species) farther downstream into warmer, more suitable habitat—closer to the species they were crafted to protect. Further, proposed flow fluctuations intended to disrupt guarding behaviors of male SMB will likely have no effect on nest success (i.e., on survival of eggs/larvae). Conditions arising from the duration of low-flow components contemplated in this proposal would be temporary and given the territorial nature of SMB, they will likely return; the absence of a nest guarding male SMB also does not guarantee a decrease in nest success. Again, there is no metric to determine this.

While some of the below actions have been affirmed in other compliance analyses and enacted in other cases, the DSEIS fails to address viable means to programmatically consider SMB presence (i.e., taking a “tier-based approach” to first implement lower-impact actions) like the processes cited above, to include:

- Mechanical removal (electroshocking and an SMB incentivized harvest program, like for brown trout)
- Continued targeted rotenone treatments
- Preventing the risk of continued entrainment (a barrier net or thermal curtain)<sup>7</sup>
- Steps to address SMB and other non-native fish spawning and habitat in the -12 RM slough.

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<sup>3</sup> [National Park Service Expanded Non-native Aquatic Species Management Plan and EA](#). GCDAMP Wiki.

<sup>4</sup> [Invasive Fish Species Below Glen Canyon Dam: A Strategic Plan to Prevent, Detect, and Respond](#). GCDAMP Work Product.

<sup>5</sup> **Experiment**; noun. “An operation or procedure carried out under controlled conditions in order to discover an unknown effect or law, to test or establish a hypothesis, or to illustrate a known law.” Merriam-Webster.

<sup>6</sup> See “[Adaptive Management – The US Department of the Interior Technical Guide](#)” Williams, B. K., R. C. Szaro, and C. D. Shapiro. 2009. See also [United States Department of the Interior Environmental Statement Memorandum No. ESM 13-11](#), 2013.

<sup>7</sup> Spawning opportunities and species proliferation have the highest potential in Lake Powell—perhaps where the highest cost-to-benefit can be achieved.



Given the hypotheses and relationship between SMB, humpback chub and temperature, it is imperative to link the tools employed to analyze impacts and make decisions and disclose the results in the DSEIS. Technical review of the preliminary model and its assumptions is necessary prior to issuance of a Final SEIS. “A detailed evaluation of model uncertainties, such as how available habitat changes under different alternatives, the influence of turbidity, prey resources, and the entrainment rate of smallmouth bass would help to characterize *uncertainty of the model*.”<sup>8</sup> “These modeling efforts for the Colorado River ecosystem below Glen Canyon Dam are not completed, thus, they are not included in this evaluation.”<sup>9</sup>

The LTEMP notes that a tiered and adaptive approach identifies safeguards for adjusting or terminating condition-dependent flow and non-flow treatments *if they prove ineffective or result in unacceptable adverse impacts on other resources*— “hydropower and energy” being an explicit resource area therein. Associated tiers, trigger, and off-ramps “balance the need to use the most effective methods necessary, while avoiding deleterious methods unless necessary, by demonstrating lower tiers being ineffective.”<sup>10</sup> Whether a determination of SMB management effectiveness is possible absent applying bona fide metrics to these “boutique flows,” and given that any assigned success metric may not be discernable given fish are currently being entrained through GCD, SRP’s concerns relating to the hydropower resource and what in its opinion constitutes “unacceptable adverse impacts” are laid out below. Further detailed comments as to the DSEIS can also be found as *Attachment 1*.

### Affected Environment and Environmental Consequences Energy & Power, Reliability Risks

SRP is a significant contributor to regional reliability, and GCD hydropower is a unique and critical part of its power portfolio. In addition to its CRSP contract, SRP holds an exchange agreement with WAPA that compounds SRP’s exposure to GCD hydropower generation availability during critical hours, up to 350MW directly and over 600MW pending transmission availability. It is likely this reliable capacity could become stranded in Colorado and New Mexico under certain scenarios in the DSEIS, exposing SRP to significant reliability risks and financial burdens. While the DSEIS implies that a power emergency may allow for full availability of GCD generation, it is not certain SRP would be able to recover the dependent exchange agreement capacity. Stated plainly, the potential compounded loss of capacity from GCD and dependent exchange power unacceptably increases regional risk to resource availability, the ability to serve electrical load, and the potential for rolling blackouts if remaining regional capacity is insufficient.<sup>11</sup>

Hydrogeneration is one of the most reliable power sources on the system with the least exposure to events that might disrupt its availability such as weather events, fuel disruption, and auxiliary system issues. An absence of GCD generation would change the dynamics of regional power markets and may challenge the ability of SRP and others to procure adequate capacity for emergency system needs in advance or in real time. SRP’s power generation resource needs are increasing at an unprecedented pace, driven by significant growth in its service territory and commitments to retiring coal generation facilities. The western power grid is expanding, as well, and lacks surplus capacity due to the same drivers: load growth, resource retirements and delays in replacement resources created by supply chain and other

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<sup>8</sup> DSEIS, Pg. 3-97 (emphasis added).

<sup>9</sup> *Ibid*, Pg. 3-135.

<sup>10</sup> [Biological Opinion and Concurrence for the Glen Canyon National Recreation Area and Grand Canyon National Park Expanded Non-native Aquatic Species Management Plan](#). United States Fish and Wildlife Service. March 04, 2019.

<sup>11</sup> The scarcity of capacity has been validated by third party studies, including a recent study: E3, [Resource Adequacy in the Desert Southwest](#), February 2022.

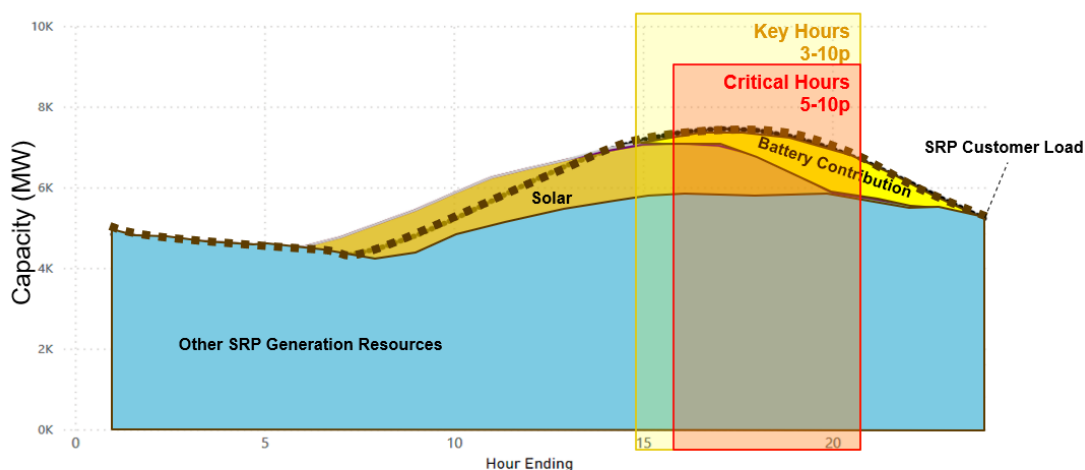


challenges. As a result, SRP will not be able to count on the market to provide replacement capacity.<sup>12</sup> To implement a change as impactful to hydropower generation as the proposed bypass flow alternatives less than three months before the summer season would result in an unacceptable risk that SRP may not have sufficient resources to reliably serve customers.<sup>13</sup>

Additionally, SRP and other balancing authorities in the region, such as WAPA, are obligated to prevent emergencies and were not provided enough information in the DSEIS to evaluate the impacts of the experiment’s implementation during emergency situations. The DSEIS identifies the option to utilize emergency provisions but does not define what constitutes an emergency, nor the procedure to enact those provisions. Examples of omitted relevant information include: clear definitions of what constitutes an emergency condition; a procedure for communication between GCD operators and power customers to notify dependent parties of an emergency; and the anticipated actions and timeline of a response from GCD operations.

One of the most significant impacts of the DSEIS’s proposed alternatives is the hydropower generation capacity reductions anticipated during the most reliability-sensitive times of the year for the desert southwest region. Reliable power is critical to human health and safety during summers in the Phoenix area—where temperatures exceeded 110 degrees *every day* of July 2023, for example. Most of the reliability risk that SRP and other desert southwest utilities manage occurs from 3pm to 10pm over summer months when ambient temperatures are peaking, demand is at its highest and solar production is waning or no longer available (see Figure 1). Despite considerable mitigation efforts, these hours will continue to drive most of the risk.

**Figure 1: Relative risk of resource insufficiency in the Desert Southwest throughout the day**



The risk to SRP’s reliability is driven by available capacity from 3-10pm (HE15-HE22):

- Peak Load Hours, Limited Available Capacity
- Solar contribution maximizes then drops off rapidly

<sup>12</sup> “...hydro resource availability will have impacts on wholesale markets, and critical conditions could reduce these utilities opportunities for short-terms transactions that may be needed in real-time operations to maintain reliability.” (E3, *Resource Adequacy in the Desert Southwest*, pg. 84).

<sup>13</sup> “The effects will vary by utility depending on the role of hydro in their portfolios. Utilities in the region who rely on these resources for a share of their capacity needs should plan proactively for the full range of future outcomes, lest they be caught unprepared and without recourse to cure a deficiency caused by” loss of hydropower generation at GCD. (E3, *Resource Adequacy in the Desert Southwest*, 6.3 Hydro Availability, pg. 84).

Regarding impacts to hydropower, the DSEIS should include provisions to establish a process to prevent emergency provisions before they are necessary.<sup>14</sup> The process should define conditions of unacceptable risk and a communication procedure between operators, schedulers and off-takers before bypass operations commence, and again after the summer to re-evaluate. At a minimum, Reclamation should work with WAPA and its contractors to develop a protocol for planning and coordinating bypass experiments that includes assessment of expected power supply availability, pricing, and demand expectations for the period the specific bypass event is being considered. This should include an assessment of grid conditions and an appropriate period of time in advance of a specific bypass operation. Summer is an especially dynamic time for grid conditions, which necessitates a continuous and periodic assessment of grid conditions prior to the start of a planned bypass. Inclusion of a daily assessment during a bypass event to evaluate grid conditions for the following day's planned bypass should be identified as part of the protocol to avoid creating emergency situations. Any protocol for these experiments must ensure grid reliability as a key component.

The DSEIS is disappointingly lacking in the analysis of potential impacts to grid reliability. It also does not provide adequate information for SRP to perform an in-house analysis. Relevant data not provided include expectations of hydropower generation for each alternative in units of power (e.g., MW on an hourly basis), impacts to CRSP firm electric service customer allocations, and the probability of alternate operations occurring in given hours, weeks, or months. The DSEIS does not include impacts to the compounded loss of capacity SRP will experience due to the exchange agreement, nor the potential impacts to transmission stability as a result of reducing GCD output to a minimum during high-demand time periods. As a result of a lack of available surplus capacity for the reasons listed above, SRP and other utilities that rely on GCD in their portfolio will not be able to count on the market to provide the capacity that is needed. The "hydro resource availability will have impacts on wholesale markets, and critical conditions could reduce these utilities' opportunities for short-term transactions that may be needed in real-time operations to maintain reliability."<sup>15</sup>

While SRP has taken steps to plan for uncertainty in future years based on hydrologic conditions, SRP does not have near-term solutions to replace GCD's capacity for year-over-year near-term proposed policies. If GCD is not generating the anticipated amounts of power during peak summer months at critical hours in a region that is already without surplus capacity, SRP does not anticipate replacement power to be available for purchase during those times.

#### Economic Value & Regional Cost Impacts

The DSEIS fails to include scarcity pricing related to regional capacity shortages resulting in an under-representation of the replacement cost of power. "A shrinking surplus and corresponding tight conditions in energy markets marked by high prices and low liquidity leave little room for error in planning for Resource Adequacy – the likelihood that a neighbor's surplus may be available to cure a deficiency is shrinking."<sup>16</sup> The DSEIS description of hydropower's "economic value" is inconsistent with the LTEMP and its Appendix K, which states the economic value is "measured in terms of changes in the value of regional power system capacity (the power system comprised of Western's long-term firm electric service

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<sup>14</sup> See generally *supra* at 10, Pg. 5: "a tiered and adaptive approach ... identified safeguards for *adjusting or stopping if unacceptable or unanticipated adverse impacts are observed or projected to occur.*"

E3, *Resource Adequacy in Desert Southwest*, pg. 84

<sup>16</sup> *Ibid*, pg. 18



customers) and overall system-level electricity production costs (the entire Western Interconnection).” The second analysis (presented in Section K.2) studied how system resources and operations under LTEMP alternatives affect the wholesale electricity rates paid by utility entities that receive federal preference power produced by GCD. The third analysis (presented in Section K.3) studied the effects of alternatives on electricity rates paid by retail customers.<sup>17</sup> For this reason, the DSEIS should be revised to include analysis undertaken by WAPA, using its GTMax model, consistent with the analysis and impacts described in the LTEMP. The DSEIS’s effects analysis must include thorough assessment of the impacts to replacement power availability and grid reliability.

Assessment of such impacts resulting from implementing this experiment during the summer months is an essential part of the DSEIS analysis. From a financial perspective, impacts to the Upper Colorado River Basin Fund (Basin Fund) are not assessed or disclosed. In the event that WAPA must purchase power to replace hydropower generation lost due to the implementation of bypass operations for non-native fish control, these costs should not be borne by the Basin Fund or the hydropower customers. Additionally, the DSEIS does not address the potential financial impacts to the region. Basin Fund revenues are not a proxy for regional cost impacts.

Impacts to SRP and other CRSP firm electric service customers, in their capacity as electric service providers obligated to provide reliable electricity to retail customers, must be added to the DSEIS’s effects analysis. These impacts are distinct from impacts to WAPA and the Basin Fund. And for all the unacceptable impacts to grid reliability and monetary loss, including to the Basin Fund, it is uncertain whether the proposed experimental flow actions will have any effect on SMB spawning.

#### Impacts to Carbon-Free Initiatives

All proposed LTEMP scenarios will result in more extensive losses of carbon-free power and associated renewable energy credits (RECs) than the original analysis indicated for all entities, with varying degrees of severity. Based on current allocations of GCD hydropower, possible REC impacts to SRP alone range from a *minimum* annual loss of approximately 25,000 RECs in Scenario 2.8, to as high as approximately 150,000 RECs in Scenario 2.6. This means, under Scenario 2.6, SRP and its customers stand to lose upwards of 600,000 RECs throughout the flow period’s duration. This is a substantial volume of RECs that SRP and its customers rely upon for achievement of corporate goals, meeting stakeholder commitments, and advancing decarbonization in the Southwest. Loss of these RECs will result in added costs for SRP and any customers who need to procure replacement RECs to meet aggressive sustainability targets and will reduce the effectiveness of GCD as a reliable decarbonization resource.

#### Conclusion

SRP believes that other methods are likely to be more effective in disrupting SMB proliferation than changes in flow. Absent well-defined metrics to gauge its effectiveness, this proposal adds an idiosyncratic tool to the toolbox of experimental flows—one whose potential benefits are unmeasured against its readily apparent (yet in the DSEIS not fully analyzed) costs and impacts.

SRP has concerns that all proposed bypass flow options would impact power production at times when power is needed most (i.e., at times of peak demand), and strongly recommends that Reclamation assess alternatives that do not include bypass flows or disrupt hydropower generation—including but not limited

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<sup>17</sup> LTEMP FEIS, Appendix K, DOI 2016a, K-4



to preventing entrainment through reservoir elevation manipulation, a thermal curtain or barrier net, and habitat modifications to the -12 RM slough and others, where SMB and other invasive fish spawn. Particularly given any uncertainty as to whether the GCD river outlet works can reliably pass water volumes sufficient to (1) reach the specified temperature threshold, and (2) maintain deliveries pursuant to the Law of the River under certain hydrologic conditions, dependence on them for an uncertain outcome (with undefined metrics) should be considered carefully and accordingly.

Section 1.4 of the LTEMP Record of Decision (ROD) establishes a decision-making/recommendation process associated with experiments undertaken under LTEMP. This section explicitly states that “WAPA will provide updates on the status of the Basin Fund, projected purchase power prices, and its financial and operational considerations.” None of this information from WAPA is included in the DSEIS and has not been provided up to the present. Given the potential direct and immediate impacts to SRP and other CRSP firm electric service customers, SRP recommends that all LTEMP Cooperating Agencies be afforded the opportunity to participate in any decision-making/recommendation process associated with actions under this DSEIS.

SRP reiterates its appreciation for nearly a century and a quarter of cooperation with Reclamation and DOI, including through its Cooperating Agency status in this process. It is with that relationship in mind that it notes a need for additional information that is not yet captured in the DSEIS—which is necessary for the public to fully understand the proposal’s implications, and for decision-makers to make a fully informed decision. Particularly when it comes to issues as vital to the American Southwest as water and power certainty, the DSEIS should be revised to include all necessary information and analyses and reissued for public comment prior to issuing a Final SEIS, ROD, or the implementation of experiments. SRP recognizes that there are many considerations that Reclamation must address in this complex decision-making process. SRP is ready to collaborate with WAPA, its contractors, and Reclamation to address these considerations including experimental triggers, offramps, and other operational procedures.

Sincerely,



Angie Bond-Simpson, Senior Director  
Resource Management  
Salt River Project

## Attachment 1 Draft SEIS Detailed Comments

- 1) **1-6/1-7:** Ensure that the risk assessment and impacts analysis undertaken in the DSEIS, and any decision-making process include the contribution of the western Grand Canyon humpback chub population (estimated at between 66,000<sup>18</sup> and 97,000),<sup>19</sup> since this population was considered and factored into the recent status review of this species.<sup>20</sup>
- 2) **1-8:** Given Reclamation's recent 24-Month Study results and forecasts arguing that DSEIS temperature triggers may not occur, if at all, until late summer or early fall, Reclamation should re-evaluate its Timing Considerations, project timeline, and reissue a public DSEIS following revision of Section 3.3. Reissuance of a more complete DSEIS should result in a more complete effects analysis, including cumulative effects, as opposed to "the information used in this analysis," which merely allows a limited "comparison among the alternatives."
- 3) **1-10:** Revise Table 1-1's "Energy and Hydropower" component description when Section 3.3 Energy and Power has been revised.
- 4) **2-2:** Operational flexibility, as defined in LTEMP ROD page B-7, Section 1.2 should be included as an Assumptions Common to All Action Alternatives: "Reclamation also will make specific adjustments to daily and monthly release volumes, in consultation with other entities as appropriate, for several reasons, including operational, resource-related, and hydropower-related issues. Examples of these adjustments may include, but are not limited to, the following: ... For hydropower-related issues, adjustments may occur to address issues such as electrical grid reliability, actual or forecasted prices for purchased power, transmission outages, and experimental releases from other Colorado River Storage Project dams." In addition, specific reference to the Operating Criteria should be included.<sup>21</sup>
- 5) **2-9:** Hydropower Modeling Assumptions/GTMax should be rewritten by WAPA. The Power and Energy analysis included in the DSEIS does not appropriately disclose a full effects analysis required for either public comment or decision by the Secretary of the Interior. The GCMRC (Grand Canyon Monitoring and Research Center) section should be removed from the DSEIS. The Power and Energy analysis should be undertaken by WAPA with its protocols and models, consistent with previous Reclamation CRSP NEPA (National Environmental Policy Act) processes (Flaming Gorge, Aspinall, LTEMP). The "constrained optimization model" does not include capacity, rate, Basin Fund analysis, consistent with the LTEMP, nor does it address electric grid impacts in any manner.
- 6) The GCMRC model and results include all 30 traces from the CRSS model, whether an experiment is triggered in a specific trace and averages them. This analysis results in misinterpretation of the experiment's effects. Instead, the analysis should analyze the traces in which an experiment occurs and assess its effects, not an average of 30 traces, many of which do not include or trigger an experiment.

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<sup>18</sup> DSEIS public webinar, February 22, 2024

<sup>19</sup> GCDAMP Annual Reporting Meeting, January 23-24, 2024

<sup>20</sup> Five Year Review of Action Triggers for Management of Humpback Chub, BOR to USFWS, December 17, 2021

<sup>21</sup> Operating Criteria for Glen Canyon Dam in accordance with the Grand Canyon Protection Act of 1992 and the Record of Decision for the Glen Canyon Dam Long-Term Experimental and Management Plan Final Environmental Impact Statement, December 2016, June 7, 2018 (WAPA and Reclamation)





- 7) Section 3.3 of the DSEIS should be revised to include analysis undertaken by WAPA, using its GTMax model, consistent with the analysis and impacts described in the LTEMP. The impact on replacement power availability and grid reliability during the summer months of the experiment must be assessed in the DSEIS analysis.
- 8) **3-17 through 3-21:** include analysis of impacts to Renewable Energy Credits (RECs)
- 9) **3-24 through 3-35:** This information should be withdrawn and revised by WAPA based on its GTMax and other modeling results. As drafted, there are incorrect statements such as “Overall, the effects described above may be most likely for power consumers in the surrounding counties and states; more severe impacts in the immediate areas around Glen Canyon Dam and less severe impacts farther away from the dam” (p. 3-31). Those statements do not reflect the contractual and operational reality of CRSP firm electric service marketing and are misleading as to power and energy effects, as well as rate impacts to CRSP firm electric service customers.
- 10) **3-219:** “end-use” is incorrect and should be revised to “wholesale”. WAPA does not market directly to end-use customers. That obligation lies with WAPA’s firm electric service customers. “benefit” should be revised to “benefit-crediting.”
- 11) **3-220:** The paragraph describing tribal benefit crediting arrangements should be revised by WAPA. Specifically, references to the types of utilities who have entered into benefit crediting arrangements should be corrected, “lower cost power” should be removed, and the last sentence attempting to describe the history of benefit crediting should be rewritten based on the public record associated with WAPA’s SLCA/IP post-2004 resource pool public process.<sup>22</sup>
- 12) **3-222:** Remove the following sentence, as it is premature to include pending outcome of rate analysis: “However, the cost of additional capacity required under the action alternatives to replace lost capacity at Glen Canyon Dam would have negligible impacts on electric bills paid by residential consumers.
- 13) Rate impacts are not assessed or disclosed. The DSEIS recognizes this omission,<sup>23</sup> but also notes that “a Cost Recovery Charge (CRC) cannot be implemented to cover non-reimbursable purchase power expenses.”<sup>24</sup> WAPA has implemented significant rate design changes since the original implementation of LTEMP. Pair this with significant hydropower resource and financial impacts posed by the DSEIS, rate impacts should be developed by WAPA and must be included in the DSEIS.
- 14) Analysis of the Upper Colorado River Basin Fund must be completed by WAPA and included in the DSEIS. The Basin Fund is the primary funding source for Reclamation and WAPA’s CRSP operations. It is used to fund operation and maintenance expenses, repays the federal CRSP investment (with interest), provides irrigation assistance, supports Colorado River Salinity Control, as well as fund the Memorandum of Agreement projects to the Upper Basin States.

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<sup>22</sup> See 64 FR 173, September 8, 1999

<sup>23</sup> DSEIS, page 3-34 “Rate Impacts”

<sup>24</sup> DSEIS, pages 3-19, 3-223

