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Bureau of Reclamation
Attn: LTEMP SEIS Manager
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Via Email Only – LTEMPSEIS@usbr.gov

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

Wyoming Municipal Power Agency (WMPA) formed by a Joint Powers Board Agreement due to the community's needs for power to supplement their federal hydropower contract with the United States Bureau of Reclamation (USBR) (now Western Area Power Administration - WAPA). In the early 1970s, Reclamation informed communities with federal power allocations that the hydroelectric resources had been fully utilized. Thus, communities had to evaluate other options for future power supply. The Wyoming communities of Cody, Fort Laramie, Guernsey, Lingle, Lusk, Pine Bluffs, Powell, and Wheatland established WMPA to provide all the electricity necessary for the communities. WMPA currently provides electricity to approximately 24,000 Wyomingites.

The Joint Powers Board Agreement states that WMPA is to provide electricity in the most economic and feasible manner. Additionally, WMPA's mission is "to provide Wyomingites with affordable, reliable electric power while being good stewards of the natural resources and land." WMPA's long term federal hydroelectric contracts have been an important aspect of meeting its mission and fulfilling its obligation under the Joint Powers Board Agreement.

While WMPA understands that the purpose and need must be defined to meet certain NEPA requirements of the LTEMP DSEIS, broader implications and potential unintended consequences should also be considered. From WMPA's perspective, the impacts on human lives should be considered. Affordable, reliable electricity is vital to human life. Wyoming, as a state with abundant natural resources and with citizens whose livelihoods depend on their land and environment, is uniquely positioned to understand the importance of carefully balancing actions that have vast implications for the environment and the people who live there.

The importance of available, affordable electricity can be illustrated by one Wyomingite who sent a message to WMPA asking for help. The substance of the message was that this person lives on a fixed income and was unable to pay for both groceries and the electricity bill. As it was winter, this person faced the dilemma of choosing between having a hungry child or frigid child. This message exemplifies the importance of managing WMPA's resources and electric costs. Certainly, there are federal and state programs that assist people, but that fact doesn't mean that this person's financial struggle should be ignored. WMPA ratepayers pay WMPA's cost based rates. Entities such as Reclamation that make decisions that impact WAPA's and WMPA's costs need to keep firmly in mind the impacts to the lives of the people that pay for electricity.

The ratepayer's perspective needs to be considered in the discussions of how to mitigate the smallmouth bass threat because the ratepayer ultimately pays for these mitigation efforts, whether it be directly or indirectly. Generally, Wyomingites have a strong desire to maintain balance in the ecosystem. They know this balance better than most because so many Wyomingites work outside directly in their ecosystems. Often, they have a connection to the environment that can't be duplicated by studying the environment from a climate-controlled building. Most Wyomingites want to protect threatened and endangered species because of their connection to the environment and their firsthand knowledge of ecosystems. Many Wyomingites benefit from hydropower generation as well as enjoy fishing and outdoor recreation. Determining the best solutions and managing costs is vital. While many entities are interested in mitigating the smallmouth bass threat, the DSEIS does not state how that mitigation will be funded. It should be funded by federal non-reimbursable appropriations, not by WAPA or its customers.

WMPA is concerned about unintended consequences due to the desire to act quickly without considering the optimal long-term goals regarding non-native fish. The very presence of smallmouth bass in the Colorado River is an unintended consequence of stocking smallmouth bass in the river several decades ago. Now, it is easy to see this as an error, but unfortunately, people didn't understand the risk in the past. This unintended consequence also underscores WMPA's recommendation about funding mitigation, because hydropower customers didn't stock smallmouth bass in the river and should not bear the obligation to mitigate for their presence.

WMPA is concerned that the -12 mile slough is not addressed in this draft. The slough is a spawning location for non-native fish like the green sunfish and smallmouth bass. This slough issue has been discussed for years and solutions have been proposed, but no action has been taken to mitigate this problem. WMPA strongly believes that removing this smallmouth bass spawning area is very important to the long-term success of mitigating threats from non-native fish.

Additionally, WMPA is concerned that temperature control through changing the flows from the dam are the only options considered in the current draft. The DSEIS states that "(s)pecific data on these fish have been collected but are not available or citable at this time." As temperature control is the main premise and the sole mitigation action

considered in the DSEIS, WMPA is concerned that this experimental attempt at temperature control will not have the desired effect. Additionally, based on Reclamation's recent 24-month study, the temperature triggers may not occur this summer. Given that information, WMPA believes that other options such as physical barriers and slough modification should be considered and undertaken as soon as possible. The DSEIS should be modified to include other than flow-only actions.

Reliable electricity is essential to human life and livelihoods. From a social justice perspective, providing reliable electricity is a moral obligation. Providing reliable electricity is WMPA's highest priority. Generally, electricity is generated exactly when humans want it because electricity is expensive and relatively difficult to store. Dispatchable generation, such as hydroelectric, gas, coal, nuclear, and diesel, produce power based on when people want it. Non-dispatchable generation, such as solar and wind, produce power based on weather conditions. Dispatchable generation is vital to providing reliable electricity. WMPA is deeply concerned about the reduction of dispatchable generation from Glen Canyon Dam when the generators are bypassed. As dispatchable generation becomes more scarce, WMPA is concerned about the availability of replacement power. Also, from an environmental perspective and as noted in the DSEIS, it is likely that most of the replacement power will come from sources with more carbon emissions than hydropower.

Additionally, WMPA strongly believes that WAPA should be the federal agency to provide the hydropower and grid reliability studies for the DSEIS. While other agencies can create models, WAPA, as a grid operator, has decades of practical experience. It's important that peer-reviewed, published models, such as those used by WAPA in the original LTEMP EIS and other Reclamation NEPA processes be used in the DSEIS for clarity and consistency. WMPA also recommends that any untested experiment must include specific implementation triggers and offramps that incorporate species as well as financial and grid considerations.

WMPA is a member of the Colorado River Energy Distributors Association (CREDA) and supports CREDA's very in depth and thorough comments.

WMPA appreciates Reclamation holding three public webinars and the opportunity to comment. Given a significant amount of incomplete and missing information in the DSEIS, WMPA asks that Reclamation provide a redrafted SEIS for public review and comment prior to issuing a final EIS.

Respectfully Submitted,



Rosemary Henry
Executive Director