

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](mailto: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

Summary:

On behalf of Utah Associated Municipal Power Systems (“UAMPS”) and the 50 municipally and community owned electric utilities that we represent, we thank the U.S. Bureau of Reclamation (“BOR”) for the opportunity to serve as a cooperating agency for the Glen Canyon Dam Long-term Experimental and Management Plan Draft Supplemental Environmental Impact Statement (“LTEMP DSEIS” or “DSEIS”). In 2016, UAMPS served as a cooperating agency for BOR’s Final Environmental Impact Statement for the Glen Canyon Dam Long-Term Experimental and Management Plan, and we hope to participate meaningfully in the process, including by providing these comments on the LTEMP DEIS.

The information contained in the LTEMP DEIS is insufficient for UAMPS to reach a preference for any of the alternatives presented. UAMPS is concerned about the increased rate pressure that will result from the LTEMP DEIS, especially considering it is proposed to be in place through operating year 2027 and does not appear to be a proven technique for reducing small mouth bass populations. Considering the increased power costs and increase in fossil fuel generation that will result from any of the Cool Mix Alternatives, it is unwise to proceed with a plan that lacks sufficient scientific support. UAMPS also seeks clarification and alignment on several items raised in the LTEMP DSEIS.

UAMPS’ Interest in the LTEMP DSEIS:

UAMPS is an interlocal agency and political subdivision of the State of Utah formed to provide comprehensive wholesale electric energy services, on a not-for-profit basis, to community-owned power systems throughout the Intermountain West. UAMPS membership consists of 50 municipally and other community-owned electric utilities located in seven western

states. Thirty-seven UAMPS members are located in Utah. Most UAMPS members own and operate a local electric utility system that provides integrated retail electric service to residential, commercial, and industrial customers. UAMPS partners with its members to ensure that electricity is affordable and reliable.

UAMPS currently manages 16 separate projects that provide power supply, transmission, and other energy services to participating members. One of these projects is the Colorado River Storage Project, named after the Colorado River Storage Project (“CRSP”) authorized by the 1956 Colorado River Storage Project Act, which provides power generated by the Glen Canyon Dam (“GCD”). UAMPS serves as a single purchasing agent for our 34 members that have a firm allocation of CRSP capacity and energy. In the aggregate, CRSP provides 642,994 MWh of contract power to 228,253 end use customers. Additionally, UAMPS and its members regularly purchase power off the grid and are therefore sensitive to market and regulatory forces that impact electricity affordability and reliability.

Flows from GCD that do not generate power affect UAMPS members in two very concrete ways: (1) They receive less power, which they must replace; and (2) the replacement power usually nearly always costs more than power from CRSP, especially when the need for additional power is unpredictable or at peak times. The increased costs are passed on to customers at a time when many Americans are already struggling financially.

#### UAMPS Comment on LTEMP DSEIS Need, Purpose and Scope:

First, UAMPS seeks clarification from BOR on the “Purpose of and Need for Action” in the LTEMP DSEIS. The LTEMP DSEIS states: “The need is to *disrupt* the establishment of the smallmouth bass below Glen Canyon Dam.”<sup>1</sup> This section uses the word “disrupt” rather than “prevent,” which was the word used in the preliminary draft UAMPS received in January. It is unclear to UAMPS whether the additional flows are designed to disrupt an already present population or prevent the arrival of the population, and it would seem that the success criteria would change depending on which circumstance applies. UAMPS requests BOR provide more information on the objectives of the DSEIS with respect to smallmouth bass populations, and how they will know if those objectives are being met.

Second, UAMPS seeks clarification from BOR on the purpose and scope of the DSEIS. The stated purpose of the DSEIS is to “analyze additional flow options at Glen Canyon Dam in response to nonnative, invasive smallmouth bass and other warmwater nonnative species recently detected directly below the dam.”<sup>2</sup> But BOR also states that the scope and the assumptions behind the proposed alternatives “may vary depending on the specific resource being considered.”<sup>3</sup> Indeed, BOR states that it “would like the flexibility to implement temperature-based flow options to target smallmouth bass, depending on where they are found in the river.”<sup>4</sup> BOR relies on temperature changes at river mile 15 and river mile 61. UAMPS seeks clarification as to the exact scope of the DSEIS. Is it an area directly below the GCD or is it the

---

<sup>1</sup> LTEMP DSEIS p. 1-6 (February 2024) (emphasis added).

<sup>2</sup> LTEMP DSEIS p. 1-6 (February 2024).

<sup>3</sup> *Id.* at p. 1-7

<sup>4</sup> *Id.* at p. 2-3.

entire area below the dam and up to and including river mile 61? Is it targeting smallmouth bass only, or all nonnative predatory fish? UAMPS believes that clarity and alignment on the purpose and the scope of the DSEIS will ensure that the objectives of the DSEIS are met.

UAMPS Comment on LTEMP DSEIS Timing:

UAMPS disagrees with BOR's comment that "[e]ven with a compressed schedule, the information used in this analysis is sufficient,"<sup>5</sup> especially given the relatively long implementation timeline – through operating year 2027. BOR should be required to substantiate the need for additional flows considering the adverse impact on UAMPS members from reduced power generation. The additional flows anticipated in the proposed alternatives would occur at a time when UAMPS members are actively seeking to develop new resources to meet load and replace retiring resources. To lose valuable hydropower for nearly four years when UAMPS members are facing upward rate pressure should require better supporting documentation from BOR supporting the need and effectiveness for the additional flows. Though BOR acknowledges that "[m]ore information may become available to evaluate particular resources as the NEPA process develops,"<sup>6</sup> UAMPS believes that the real and negative effects that the LTEMP DSEIS will have on hydropower means that BOR should gather further data regarding our understanding of smallmouth bass populations before allowing an experimental solution.

UAMPS Comment on Smallmouth Bass Data Generally:

UAMPS requests that BOR provide the smallmouth bass data that they relied upon to inform the DSEIS. To be specific, UAMPS would like BOR to clarify what they meant when they state that "[s]pecific data on [smallmouth bass] have been collected but are not available or citable at this time."<sup>7</sup> Related to that inquiry, UAMPS would also like to understand what BOR meant when it stated that "The smallmouth bass model does not link at this time to other population models, such as the humpback chub integrated model."<sup>8</sup> It is because UAMPS takes seriously its obligations as a stakeholder along the Colorado River, UAMPS would like to better understand what data is not being cited to as part of this DSEIS. Further, and as it relates to the overall need and purpose of the DSEIS, it is necessary to understand how the smallmouth bass population impacts other native species like the humpback chub. Especially if BOR is proposing specific additional flows that would impact hydropower production, UAMPS feels it is important for UAMPS members and the public to understand what data is being examined, and also how this data will be utilized to determine whether or not any of these flows will have a meaningful impact.

UAMPS Comment on Directed Removal of Smallmouth Bass:

UAMPS seeks clarification on the results of direct removal efforts of smallmouth bass in general. As stated in the DSEIS, "[i]n September 2022 and August 2023, the [National Park

---

<sup>5</sup> LTEMP DSEIS p. 1-8 (February 2024).

<sup>6</sup> *Id.* at 2-3.

<sup>7</sup> *Id.* at 3-68.

<sup>8</sup> *Id.*

Service] began to deploy the EPA-approved fish piscicide rotenone to kill [smallmouth bass].”<sup>9</sup> BOR also states that this is a practice that can take place where smallmouth bass have been identified in the Colorado River, and UAMPS would like to know the results of these directed removal efforts. UAMPS highly encourages BOR and the National Park Service (“NPS”) to explore directed removal efforts that would accomplish the goals of DSEIS in a more efficient and targeted manner than adjusting flows at GCD.

#### UAMPS Comment on Slough Modifications:

UAMPS finds that the discussion surrounding NPS’ ability to treat slough habitat severely lacking especially in light of the fact that BOR states in the DSEIS that “[g]reater number of small mouth bass have been capture in the Lee’s Ferry reach in 2022 and 2023 [...] [m]ost of the smallmouth bass in the Les’s Ferry reach have been caught in and near the -12-mile slough.”<sup>10</sup> UAMPS believes that treating the slough or otherwise addressing the large smallmouth bass population at the slough appear to be an efficient and targeted way of addressing smallmouth bass population growth in the Colorado River without reducing power generation. Much like the directed removal efforts, UAMPS believes that BOR should exhaust these targeted solutions first before addressing a broader and more damaging solution like additional flows from GCD.

#### UAMPS Comment on Alternatives:

UAMPS would like additional details on the effectiveness of the alternatives discussed in the DSEIS. In particular, BOR states that “[t]he effectiveness of [the Cool Mix with Flow Spike Alternative] at achieving temperature goals, given certain river outlet works availability, would be similar to those outlined in the Cool Mix Alternative.”<sup>11</sup> (BOR also states that these two would also have a similar effect as the Cold Shock with Flow Spike Alternative.) The net effect of these three alternatives with similar outcomes would be “cooling down to river mile 15 and the confluence of the Little Colorado River.”<sup>12</sup> BOR concluded that the other Cold Shock Alternative “may not be possible to reach desired target temperatures.”<sup>13</sup> In summation, the outcome of the one alternative that seems to be effective, is still effective at cooling down to river mile 15. Given these alternatives, UAMPS seeks to better understand how any of the discussed alternatives would cool the water sufficient to prevent smallmouth bass population growth beyond river mile 15.

#### UAMPS Comment on Flows to Hydropower and Energy Costs:

UAMPS is deeply concerned about the impact of additional flows at GCD will have on hydropower production and consequently energy costs. UAMPS is grateful that BOR recognized in the DSEIS that:

---

<sup>9</sup> LTEMP DSEIS p. 2-3 (February 2024).

<sup>10</sup> *Id.* at 3-68.

<sup>11</sup> *Id.* at 2-12.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.* at 2-14.

bypassing the electrical generators at Glen Canyon Dam, the experiment will reduce hydropower generation. Accordingly, WAPA will be required to purchase replacement power to fulfill its contractual obligations to customers. The experiment would markedly increase the amount of non-reimbursable costs drawn from the Basin Fund and returned to the Treasury.

The net effect of all four cold water flows analyzed in this DSEIS will financially impact ratepayers and the problem as BOR highlights is three-fold: (1) WAPA and UAMPS members will have to replace the lost power; (2) the replacement power will likely be more expensive; and (3) the replacement power will likely emit more carbon and air pollutants.<sup>14</sup> While the Basin Fund may off-set some costs, it must remain solvent. Moreover, the health of the Basin Fund is critically important as it funds important environmental and salinity programs along the Colorado River. This is all the more reason why UAMPS believes that it is crucial to get greater clarity and alignment on what this DSEIS seeks to accomplish.

UAMPS Comment on Reliability:

UAMPS requests a detailed analysis of how increased flows and the reduced hydropower that would result would affect reliability in the Western Interconnection. As an organization with members in seven western states, UAMPS is acutely aware of the lack of capacity generation in the West. Further reductions in output from GCD would be problematic to UAMPS members in fulfilling their obligations to provide essential electric service to their communities.

Conclusion:

UAMPS values the longstanding working relationship that we have with BOR, WAPA, NPS and other federal agencies with jurisdiction over areas of the Colorado River System. We look forward to working together to resolve our concerns with the LTEMP DSEIS as we collectively care for and manage such a valuable resource.

Sincerely,



Mike Squires, Esq.  
Managing Director of Government Affairs  
Utah Associated Municipal Power Systems

---

<sup>14</sup>LTEMP DSEIS p. 3-25 (February 2024).