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March 25, 2024

U.S. 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: Draft Supplemental Environmental Impact Statement (DSEIS) for Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) (89 Fed. Reg. 9,148 (February 9, 2024)) (EIS No. 20240024)

Statewide associations of electric cooperatives from the states of Wyoming, Nebraska, Utah, Colorado, Arizona, and New Mexico appreciate the opportunity to provide comments on the DSEIS which was issued on February 9, 2024.

60 Years of Power Generation

This year marks the 60th anniversary of power generation at the Glen Canyon Dam (GCD).¹ Both the vision and sacrifices made by previous and current generations make it possible to now provide over five million retail customers from across seven western states² with access to affordable, reliable, and clean power. Large parts of the Colorado River Storage Project (CRSP) customer area include rural, remote, and even underserved or disadvantaged communities.

GCD is a clear example of human ingenuity and adaptability. It harnesses a natural energy source and converts it into an always available power resource which is vital for the health, safety, and welfare of all CRSP retail customers. Any proposed experimental actions resulting in reduced power generation at GCD must scrutinize the probability of any perceived desirable results from those experimental actions by weighing the full impacts on the human environment. The longevity of GCD and its hydropower operations must always be a priority. The solvency of CRSP depends upon GCD hydropower operations. Most importantly, lives in the West depend on GCD to keep the lights on for generations to come.

¹ <https://www.usbr.gov/newsroom/news-release/4747>

² Power Generated at GCD is provided primarily to seven states which are part of the Colorado River Storage Project (CRSP) customer area. However, GCD is part of the Western Power Grid and may provide power to the Western Area Power Administration's (WAPA) 15-state region as was done in in 2000, 2001, 2020, and 2022 when emergency power was provided to California.

DSEIS Proposed Action

The Bureau of Reclamation (Reclamation) has concluded that the potential threat which smallmouth bass pose on threatened and endangered species below GCD is an unacceptable risk which necessitates immediate actions to prevent smallmouth bass from becoming established downstream from GCD. The DSEIS contemplates six alternatives to address the smallmouth bass risk. Four of the six proposals include changes in operations at GCD regarding flow option alternatives aimed at reducing the river temperature below 15.5 degrees Celsius. This would theoretically disrupt smallmouth bass spawning.

Specifically, the flow option alternatives contemplate bypassing water through the river outlets and reducing releases through the penstocks which is where power generation occurs. Thus, each bypass flow option would reduce power generation at GCD. The DSEIS attempts to address the economic impacts to hydropower if flow options are implemented. However, this analysis fails to provide accurate and complete economic impacts caused by the power generation reductions.

Such gross inadequacies prevent a decision maker and the public from being able to make a fully informed decision regarding the proposed actions. Reclamation should work closely with WAPA to amend the energy and power section (Section 3.3) of the DSEIS, so that complete and accurate information can be weighed prior to issuing a final SEIS.

Impacts to Hydropower and CRSP

The National Environmental Policy Act (NEPA) requires federal agencies to take a hard look when preparing environmental impact statements. This “hard look” standard means federal agencies must thoroughly assess the cumulative effects of their proposed actions on the human environment.³ This also includes consideration of economic factors.⁴ Then the information must be disclosed to the public before making decisions.

The methodology implemented in the DSEIS misapplies the use of averages by including when experimental flow options would not be triggered. This flawed methodology drastically minimizes the actual impacts which the experimental flow options would have on hydropower.

Moreover, the DSEIS should include a complete analysis of the proposed actions’ impact on hydropower and CRSP. This would include, at a minimum, consideration of components included in the LTEMP FEIS in 2016. Such components included impacts to the Basin Fund and CRSP operations, changes to marketable capacity, availability of replacement power, effects on regional energy prices, effects on WAPA wholesale prices, and effects on retail rates for the millions of CRSP retail customers.

Reclamation must work with WAPA to ensure that all foreseeable impacts on hydropower are included within any final SEIS. This will allow for decision makers to weigh complete and accurate information. It will also allow for full consideration of the impacts on CRSP and the millions of CRSP retail customers who will bear the costs associated with the proposed actions within the DSEIS.

³ C.F.R. § 651.16 (2024).

⁴ C.F.R. § 1502.16 (2024).

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We appreciate the opportunity to provide comments on this critical issue on behalf of the electric cooperative member-owners who are also CRSP retail customers.

Respectfully,



Shawn Taylor
Executive Director
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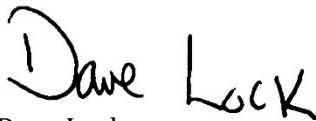
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