



ARIZONA MUNICIPAL POWER
USERS' ASSOCIATION



GRAND CANYON STATE ELECTRIC
COOPERATIVE ASSOCIATION



ARIZONA POWER
AUTHORITY



IRRIGATION & ELECTRICAL DISTRICTS'
ASSOCIATION OF ARIZONA

Draft

Reclamation 2007 Interim Guidelines
SEIS Project Manager
Upper Colorado Basin Region
125 South State Street, Suite 8100
Salt Lake City, UT 84138
CRinterimops@usbr.gov

November 6, 2023

Re: Near-term Colorado River Operations – Revised Draft SEIS (October 27, 2023)

Dear Regional Director Pullan:

On behalf of Public Power Interests in Arizona, the Arizona Municipal Power Users' Association (AMPUA), Arizona Power Authority (APA), Grand Canyon State Electrical Cooperative Association (GCSECA) and Irrigation and Electrical Districts Association (IEDA) submit the following comments in response to the Revised Draft Supplemental Environmental Impact Statement published in the Federal Register Notice on October 27, 2023.

AMPUA is an association of Arizona public and consumer owned power entities including irrigation districts, electrical districts, electric cooperatives, municipally owned electric systems, Salt River Project, and Central Arizona Project. The majority of our members have contracts for federal hydropower.

The APA is a corporate and political body of the State of Arizona. The Authority is the designated contractor for the entitlement of the State of Arizona in electric capacity and energy associated with the Hoover Dam. The Authority markets and schedules this entitlement to 63 power customers throughout the state of Arizona, consisting of tribes, cities and towns, irrigation and electrical districts, and the Central Arizona Water Conservation District.

GCSECA is a membership trade organization consisting of six Electric Distribution Cooperatives and the Arizona Generation and Transmission Cooperatives who collectively serve approximately 450,000 rural residents across 12 counties in Arizona. GCSECA's member cooperatives are rural, not-for-profit utilities that are owned and governed by the people they serve.

IEDA represents 25 members, some of whom receive water and all of whom receive power generated from the hydroelectric plants on the Colorado River. IEDA has been in existence since 1962, with the primary purpose of protecting the federal hydropower contracts of its members.

We appreciate the Bureau of Reclamation's withdrawal of the Draft SEIS and revision based on the Lower Basin States' proposal and the revised hydrology. We found the previous alternatives presented in the April SEIS too narrow in scope to support, and the inequity between the Upper and Lower Basin states regarding conservation measures was alarming.

We applaud the Lower Basin's proposal and would support this alternative with the caveat that if there is significant snowpack in 2024 and 2025, that conservation in 2026 be eliminated.

The Draft SEIS was thorough, but we identified a major deficiency with regards to hydropower, that we wish to highlight. There is a glaring misrepresentation that the "Proposed Alternative" outperforms the "No Action Alternative" with regards to hydropower. This is only true in 2024 for Glen Canyon Dam (GCD). Subsequent years at GCD have mixed results, and the cumulative impact of the "Proposed Alternative" is negative, compared to the "No Action Alternative" except for the minimum condition in 2026 (Table 3-49). In the final report, please fix this representation to be wholistic to the impacts to all the dams, not just Glen Canyon.

While we appreciate the "Total Annual Economic Value of Power" tables (Table 3-71 & Table 3-75), the socioeconomic impact should highlight the cost of replacement power for lost generation due to persistent drought conditions and the "Proposed Alternative." Therefore, we find that this report has provided an insufficient analysis of the "Proposed Alternative." We therefore request that a more thorough analysis be completed prior to a final determination.

We find the Draft SEIS also failed to analyze aspects of the Western Grid including replacement power availability and scarcity pricing impacts in a capacity deficient market.

We also question the continued insistence of High Flow Experiments (HFEs) as the only option for building beaches. HFEs have been proven to increase beaches for a limited time (3-6 months), washing sediment downstream in the process. The main reason is that the angle of repose for wet sand is so much greater than dry sand. Erosion occurs from flow fluctuations, but the beaches return to their natural state after the sediment is deposited because river hydraulics haven't changed. If you wish to improve beaches for camping, please consider removing the invasive tamarisk. We have long advocated for armoring of beaches to help in prevention of future erosion so HFEs wouldn't be necessary.

Tamarisks were introduced to the Colorado River by the federal government during the 19th century. They have spread downstream (and continue to be transported by HFEs) and are choking out native vegetation and consuming precious water resources. Part of the Inflation Reduction Act (IRA) passed in June 2023, includes funds for eco-system restoration. Funding for removal should be pursued by the Bureau of Reclamation (Bureau) to restore riverine habitat. This could be achieved via mechanical removal, which could also serve the dual purpose of building beaches. Dredging is allowed downstream of Hoover Dam, and should be considered downstream of Glen Canyon.

The report also highlighted the cost borne by federal hydropower preference customers. This accounts for over 10% of the budget at Hoover Dam, and a higher percentage at Glen Canyon Dam. It was mentioned in the Post-2026 scoping report to use federal hydropower as a revenue source for unfunded mandates. Federal hydropower customers cannot continue to bear the costs of burdensome programs. We oppose this proposed funding mechanism. Therefore, we encourage the Bureau to unload the costs associated with these programs away from hydropower customers and not obligate our customers with additional costs in the Near-Term SEIS process or Post-2026 process.

Finally, in reviewing the Draft SEIS, there are discrepancies or questions that need to be resolved for the final report to consider:

- If Lake Powell is in the Lower Elevation Balancing Tier (3525'-3370'), can the system infrastructure at Glen Canyon Dam accommodate the 7.0-9.5 MAF release requirements?
- How does this reconcile with the 6.0 MAF release if Lake Powell goes below 3,500'?
- The critical elevation at Lake Mead appears to be referenced both as 1,000' and 1020' in the report, which is it?
- Was the Salton Sea part of the 2007 Interim Guidelines, if not, why is it added now?
- Will HFEs transport Smallmouth Bass and other non-native predators downstream into the federally protected Humpback Chub habitat?
 - The Adaptive Management Work Group should study the migration downstream of non-native fish due to HFEs.
 - We appreciate that HFEs will not be allowed if the elevation of Lake Powell goes below 3,500'.
- Why does the "Proposed Alternative" indicate that more than 1.5 MAF will be delivered to Mexico in 2026?

We appreciate the opportunity to comment on and participate in this process, and look forward to continuing to work with the Bureau in the future.

Sincerely,

Russell Smoldon
AMPUA

Jordy Fuentes
APA

Dave Lock
GCSECA

Ed Gerak
IEDA