



PRESIDENT'S PREROGATIVE

TO: IEDA Board
FROM: Glen Vortherms
RE: LTEMP Draft Supplemental Environmental Impact Statement
DATE: March 24

The President's Prerogative is a new initiative to attempt to educate members and increase engagement. This issue will serve as a test case, as it has essentially run its course. We will take time to discuss this issue as a way to enhance participation in the future.

Issue

Nonnative fish were introduced into the Colorado River prior to construction of the dam, with multiple species (trout & walleye) likely finding their way into the mainstream after construction of the dam.

Smallmouth bass were introduced into Lake Powell in 1982 and first discovered downstream of Glen Canyon Dam (GCD) in 2003. Green sunfish have existed downstream of GCD for 35 years, but it wasn't until 2015 that multiple green sunfish were found near Lee's Ferry, likely making their way through the turbines from Lake Powell.

There exists a particular spot, the slough, downstream of the dam at RM-12. This slough is fed by a warmwater spring and creates a perfect condition for establishment of warmwater, nonnative fish.

In 2015, green sunfish were detected in the slough. The National Park Service rotenoned (poisoned) the fish, but they continue to be prolific downstream

of the dam. Another species, the smallmouth bass, has also been detected downstream of the dam in abundance in 2022.

The rationale for the problem is that the lake levels are too low, and the penstocks are drawing from the warmer level of the lake where the fish reside. Higher lake levels resulted in drawing colder water, where most fish don't frequent.

This set in motion a series of efforts to lower water releases to cool the water so that nonnative fish aren't able to spawn/get established. The irony is that humpback chub benefit from warmer water.

Draft Smallmouth Bass EA

In February, 2023, DOI/USBR released a Smallmouth Bass EA with a 14 day comment window. There were four alternative, but it did not include the WAPA Non-Bypass alternative. Some of the alternative would have resulted in 5 months of bypass at GCD, reducing generation by 21%. Their estimates showed an \$81M impact, which I believe was only half of the true impact. IEDA commented, along with approximately 7,000 others, but the majority of thoughtful letters all supported hydropower (@350 letter). Thanks to these letters showing such a dramatic impact (and the benefit of a wet water year), it was decided to make this a full SEIS.

LTEMP Draft SEIS

The LTEMP Draft SEIS, is basically the Smallmouth Bass EA with the addition of the WAPA non-bypass alternative. IEDA drafted comments and received support (willing to sign on) from AMPUA, APA & GCSECA.

The issues identified in the comment letter include; concerns with the limited "purpose and need", deficiencies in the alternatives, questions regarding the temperature (warm water helps humpback chub and cool/cold water benefits trout), HFEs (and their transport of nonnative fish downstream), the fact that the nonnative fish (and tamarisk) were introduced by the federal government prior to construction of the dam, and the flawed hydroelectric modeling.

Revised impacts, in the report, are up to \$19.4M over 3.75 years. Much less than the Smallmouth Bass EA, but true impacts are hard to determine due to WAPA not completing their full analysis until 3/15/2023.

The bias pervasive in the document was highlighted as to why this process is flawed.

Despite a majority of IEDA members having CRSP contracts, there has been no response to the letter from members.

Options

1. IEDA (or in partnership with other AZ entities) draft a letter to combat this initiative.
2. IEDA assist in members drafting letters of support from member.
3. IEDA could send in a support letter to CREDA's position.
4. Have special called meeting to brief members of the issues.
5. Engage AZ delegation to delay the process.
6. Other thoughts?