

Submission Description: (doc-less) Motion to Intervene of Colorado River Commission of Nevada under P-14992-000.

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Dockets

P-14992-000 Application for Navajo Nation (NN) Salt Trail Canyon (STC) Pumped Storage Project (PSP) by Pumped Hydro Storage LLC

Filing Party/Contacts:

Filing Party	Signer (Representative)
Other Contact (Principal)	
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Colorado River Commission of Nevada	cguerci@crc.nv.gov

Basis for Intervening:

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On October 2, 2019, the Commission accepted for filing an Application for a Preliminary Permit from Pumped Hydro Storage, LLC (Pumped Hydro) and provided for the filing of motions to intervene within 60 days of the date of Acceptance.

The Colorado River Commission of Nevada (CRCNV) is the agency of the State of Nevada responsible for acquiring and managing Nevada's share of water and hydropower resources from the Colorado River. See NRS 538.171. The State of Nevada receives an allocation of water from the Colorado River and a share of the hydropower generated at the Glen Canyon Dam as well as other dams along the river.

The Colorado River is one of the most highly regulated rivers in the world. It flows through portions of seven states and Mexico. The Colorado River is managed and operated under numerous compacts, federal laws, court decisions and decrees, contracts and regulatory guidelines collectively known as the "Law of the River." The "Law of the River" includes primarily the Colorado River Compact of 1922, the Boulder Canyon Project Act and Arizona v. California 373 U.S. 546 (1963) et. al.

Pumped Hydro Storage LLC has applied for a preliminary permit for a proposed 2,800 MW Pumped Storage Project including dams on the Little Colorado River in Coconino County, Arizona. The confluence of the Little Colorado River and the Colorado River supports the largest remaining population of a federally protected fish - the humpback chub - in the world. The Little Colorado River is the only known spawning population of the endangered humpback chub in the Grand Canyon.

The Secretary of the Interior has appointed the CRCNV as a member of the federal advisory Glen Canyon Dam Adaptive Management Workgroup. One of the areas of concern for this group is the humpback chub. If the numbers

of adult and sub-adult humpback chub decline, actions must be taken under the Long Term Experimental and Management Plan Record of Decision (LTEMP ROD) for Glen Canyon Dam, potentially affecting the availability of water to Nevada and the production of hydropower.

Further, the dams proposed in this project have the potential to change the water temperature in the Little Colorado River so the humpback chub can no longer spawn. Any depression in humpback chub spawning could trigger required actions in the LTEMP ROD.

The Colorado River supplies ninety (90) percent of the drinking water for southern Nevada. As the responsible state agency, the CRCNV has an interest in the outcome of this proceeding that cannot be represented by other parties. Its intervention is timely filed, in the public interest and should be granted.

Document Content(s)

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