Data Submitted (UTC 11): 9/6/2022 7:00:00 AM
First name: Stanley
Last name: Lutz
Organization: Salt River Project
Title: Senior Attorney
Comments: Kara M. Montalvo, DirectorEnvironmental Services Mail Stop PAB359 |P.O. 52025Phoenix, AZ 85072-2025P: (602) 236-5256Kara.Montalvo@srpnet.comSeptember 6, 2022Via Electronic Comment Submittal:https://cara.fs2c.usda.gov/Public/CommentInput?Project=51592Attn: Michiko Martin, Regional Forester and Objection Reviewing Officer, Southwestern Region, U.S. Forest Service333 Broadway Blvd SE Albuquerque, NM 87102Re: Salt River Valley Water Users' Association and Salt River Project Agricultural Improvement and Power District's Objection under 36 C.F.R. [sect] 219.54 to the Tonto National Forest Final Land Management Plan, Final Environmental Impact Statement, and Draft Record of Decision; Nos. MB-R3-12-13, MB-R3-12-14, and MB-R3-12-15 (Neil Bosworth, Responsible Officer, Tonto National Forest Supervisor)Dear Ms. Martin:Pursuant to 36 C.F.R. [sect] 219.54, the Salt River Valley Water Users' Association ("Association") and the Salt River Project Agricultural Improvement and Power District ("District"), hereinafter collectively ("SRP") submit this objection to the Tonto National Forest Land Management Plan ("Forest Plan"), Final Environmental Impact Statement ("FEIS"), and Draft Record of Decision for the Tonto National Forest Land Management Plan ("Draft ROD").1 SRP is one of the nation's oldest federal reclamation projects and a significant portion of SRP's water and power infrastructure is situated within a corridor of lands in the Tonto National Forest ("TNF"). This corridor, along the Salt and Verde Rivers, which the Secretary of the Interior withdrew for reclamation purposes ("Reclamation Withdrawn Lands"),2 is critically important to SRP in meeting its responsibility to the United States to care for, operate, and maintain the Salt River Federal Reclamation Project ("Reclamation Project").SRP acknowledges the TNF's considerable effort to develop a Forest Plan that provides a balanced direction for the management, protection, and use of the forest. SRP is supportive of a Forest Plan that "fulfill[s] its stewardship responsibilities to best meet the current and future needs of the people and communities" of Arizona. Nevertheless, SRP objects to TNF's selection of the Coronado Mesa Recommended Wilderness Area ("CMRWA") as suitable for Congressional wilderness area designation. The CMRWA is located adjacent to the Reclamation Project and Reclamation Withdrawn Lands, downstream of Roosevelt Dam.3 As discussed below, designation of this site as recommended wilderness will inhibit future Reclamation Project operations.SRP is currently investigating the potential to increase the amount of long duration energy storage capacity (known as pumped storage) for the Reclamation Project to meet future power demand with renewable power sources such as solar and wind resources. In a 2014 study, Reclamation identified a site called "Alternative Apache 1B" ("Apache Lake PSP Site") as valuable for the development of pumped storage hydropower infrastructure ("2014 Reclamation PSP Study" attached hereto as Attachment B).4 The Apache Lake PSP Site is located in the CMRWA. Development of a pumped storage project at the Apache Lake PSP Site would allow SRP to: (1) reliably provide power for future demand in an energy scarce environment; (2) replace existing fossil fuel generating resources with renewable power; and (3) meet its goals to reduce its carbon emissions. The TNF designation of the CMRWA in its final Forest Plan would frustrate SRP's efforts to investigate and eventually develop a pumped storage project at the Apache Lake PSP Site. The removal of this area from potential carbon-free power facility development is not in the best interest of the American public. Given the critical importance of the CMRWA to future pumped storage hydropower development, SRP requests that the Forest Service revise the Forest Plan to exclude the CMRWA from its recommendations for wilderness designations. SRP is supportive of recommended wilderness areas in other areas of the TNF that are in the public interest and do not adversely impact SRP's obligations for the care, operation, and maintenance of the Reclamation Project.A. SRP's Objection is Founded in and Supported by, its Participation in Each Step of the Forest Plan Revision Process, Including in Person Meetings and the Submission of Written CommentsSRP has participated in each step of the Plan Revision Process and has submitted comments to the TNF on eight occasions.5 In those comments, SRP urged the TNF to consider the operation and maintenance needs of existing and future SRP water and power infrastructure within the Forest. As required by 36 C.F.R. [sect] 229.54, a summary of the subject matter of our previous comments is set forth here.[bull] SRP first submitted comments on May 18, 2017, in response to TNF's Notice of Intent ("NOI") to revise the Forest Plan and prepare an Environmental Impact Statement ("EIS").6

Those comments explained SRP's longstanding interest in the Forest Plan, its relationship to Reclamation Project operation and maintenance and the importance of considering water and power infrastructure needs going forward in the development of a revised plan.[bull] On June 5, 2017, SRP submitted comments regarding the TNF's wild and scenic river eligibility process.7 SRP raised concerns regarding the criteria used to identify proposed wild and scenic river designations that would impact existing and future water and power operations and infrastructure.[bull] On October 10, 2017, SRP submitted comments regarding the TNF's wilderness recommendation process.8 The comments highlighted conflicts between the boundaries of recommended wilderness areas and existing and future water and power infrastructure. At that time, the CMRWA site had not yet been singled out for recommendation; nevertheless, SRP's comment expressed concerns about the impact of any designation on the operation and maintenance of water and power infrastructure, as well as future power development.[bull] On January 10, 2018, SRP submitted comments regarding the TNF's proposed land and resource management plan.9 SRP requested that the plan provide the needed flexibility for operation and maintenance of Reclamation Project water and power infrastructure. SRP expressed concerns regarding restoration of natural flow regimes and water-based recreation and took issue with aspects of the plan affecting access to water and power infrastructure, wildfires, and utility corridors. Finally, SRP requested that the plan consider SRP's ongoing commitments to conserve species and habitat pursuant to incidental take permits issued to SRP under Section 10(a)(1)(B) of the Endangered Species Act. This letter also summarized SRP's participation in the planning process to date.[bull] On February 12, 2018, SRP submitted comments regarding the TNF's draft evaluation map.10 SRP identified conflicts between recommended wilderness areas and water and power infrastructure and access roads.[bull] On May 22, 2018, SRP submitted comments regarding the TNF's wilderness recommendation process, after meeting with the agency in person to voice concerns about how the recommendations might interfere with present and future water and power operations and infrastructure development.11 Through its written comments, SRP requested that the TNF recognize existing land use authorizations, including Reclamation Land Withdrawals and other areas within the project influence, for water and power infrastructure.12 Again, at the time of these comments, the CMRWA site had not been singled out by the TNF as a recommended wilderness area.13[bull] On March 12, 2020, SRP submitted comments regarding the TNF's Draft Land Management Plan and draft EIS.14 The draft EIS included alternatives that proposed, for the first time, that the CMRWA site be recommended for wilderness designation. SRP's comments on the draft EIS expressed concerns regarding proposed special management areas and the direction of the Forest Plan and specifically requested that the CMRWA be excluded from the recommended wilderness areas.[bull] On May 24, 2022, SRP submitted an objection under 36 C.F.R. [sect] 219.54 to the final TNF Forest Plan, EIS, and Draft ROD.15 SRP's objection expressed concern that the inclusion of the CMRWA site in the National Wilderness Preservation System in the Draft ROD would inhibit the Reclamation Project's ability to achieve Congressionally authorized purposes, including the addition of long duration and low carbon energy storage assets necessary to support a transition to renewable energy sources. SRP's objections specifically requested that the CMRWA site be excluded from Alternative B, as selected in the Draft ROD, and replaced with alternative TNF lands meeting the wilderness criteria outlined in the TNF planning documents.B. Statement of InterestSRP and TNF have a longstanding, mutual interest in and responsibility for ensuring that Forest management activities do not frustrate Reclamation Project purposes, including the development of pumped storage hydropower resources such as on the Apache Lake PSP Site. The following sections describe the respective roles and responsibilities of TNF, Reclamation and SRP, and briefly summarize the laws and agreements that necessitate collaborative decision-making among these entities regarding Forest management. Chief among these agreements is the Management Memorandum among SRP, the Forest Service, and Reclamation dated April 27, 1979 ("Tri-Party Agreement"), discussed in Section B.3, below.1. The Reclamation Project was Authorized by Congress to Provide Reliable, Sustainable Water and Power Supplies to Central Arizona Through the Construction, Care, Operation and Maintenance of Infrastructure that is Largely Situated on TNF Lands.SRP is one of the nation's largest public power utilities and one of the largest raw-water suppliers in Arizona. The Association is a private corporation formed in 1903 under the laws of the Territory of Arizona by local farmers within the Salt River Valley to contract with Reclamation for the construction and repayment of the costs incurred in building and acquiring the works of the Reclamation Project. The District is an agricultural improvement district organized in 1937 under the laws of the State of Arizona for the purpose, in part, of providing financial support to the Association.16 Under contract

between the Association and the District, and approved by the United States, the District and the Association collectively and collaboratively operate the Reclamation Project.In 1917, the United States turned over the care, operation, and maintenance of the Reclamation Project to the Association.17 The United States continues to hold title to all Reclamation Project facilities and has a supervisory role over such facilities. The Reclamation Project includes dams, reservoirs, a diversion dam, canals and laterals, and other associated facilities. Reclamation Project Dams include Roosevelt, Horse Mesa, Mormon Flat, and Stewart Mountain Dams on the Salt River; Horseshoe and Bartlett Dams on the Verde River; and C.C. Cragin Dam on East Clear Creek. Reservoirs include Roosevelt, Apache, Canyon and Saguaro on the Salt River; Horseshoe and Bartlett on the Verde River, and C.C. Cragin on East Clear Creek. The Granite Reef Diversion dam is located on the Salt River below its confluence with the Verde.18 Hydroelectric generation facilities are located at Roosevelt, Horse Mesa, Mormon Flat and Stewart Mountain Dams. The hydropower generating facilities at Horse Mesa and Mormon Flat dams include pumped storage capability that have been used for safe and reliable energy storage since the 1970's.Water stored in Reclamation Project reservoirs drains from the 13,000 square mile Salt and Verde River watershed and the 70 square mile East Clear Creek watershed. A majority of the Verde River watershed and portions of the Salt River and East Clear Creek watersheds are located within the TNF. These watersheds supply water to the Reclamation Project that is delivered to agricultural lands and municipal water treatment plants that serve potable water to millions of people throughout the Phoenix Metropolitan area and Northern Gila County.SRP also provides electric power, including hydropower produced by the Salt River Dams, to more than one million residential, commercial, industrial, and agricultural customers in the Phoenix Metropolitan area and northern Pinal County, as well as large mining, commercial and industrial customers in east-central Arizona. In addition, SRP operates, and maintains 380 miles of high voltage transmission and distribution lines, including substations, communications sites, microwave sites, radio towers, as well as an extensive array of stream monitoring gages, precipitation gages, and snow monitoring equipment on National Forest System ("NFS") lands related to its power and water operations. A significant portion of the Reclamation Project's power transmission infrastructure is located within the TNF. Authorization for the construction, operation, and maintenance of these facilities on TNF-managed lands has been pursuant to congressional legislation, license, agreement, and Special Use Permits. For more than a century, SRP has collaborated with the TNF to access, maintain and operate these critical systems in a manner consistent with the multiple use management objectives of the Forest Service.2. TNF was Created by President Theodore Roosevelt in Furtherance of the Water and Power Supply Purposes of the Reclamation Project.The creation of the Reclamation Project, pursuant to the Reclamation Act of 1902 ("Reclamation Act"), led to the creation of the TNF.19 It was one of Reclamation's first multipurpose undertakings, designed to provide flood control, water storage, and hydroelectric power. Prior to the creation of the TNF, the U.S. Secretary of the Interior withdrew certain Reclamation Withdrawn Lands under Section 3 of the Reclamation Act encompassing the Salt and Verde Rivers for the benefit of the Reclamation Project.20 Following these Reclamation Land Withdrawals, on October 3, 1905, President Theodore Roosevelt withdrew lands for the purpose of establishing the Tonto Forest Reserve, the precursor to the TNF.21 The withdrawal was made subject to a savings clause that specifically omitted the Reclamation Withdrawn
Lands previously withdrawn for the Reclamation Project.22 Twelve years later, on February 5, 1917, the United States issued Water Power designations. Among them, Water Power Designation No. 8 reserved for water power development and hydroelectric use the area that encompasses the lower Salt River dams, including Apache Lake and upstream to Roosevelt Dam.The fundamental purpose of the Tonto Forest Reserve is to protect the water supply of the Reclamation Project.23 The Forest Plan itself recognizes that "[t]he Tonto National Forest was created in 1905 to protect the Salt River Watershed[hellip]and the creation of the national forest to protect [the Reclamation Project] and provide water to Phoenix and Mesa were critical elements in the political process that gave statehood to Arizona."24 Over a hundred years later, the TNF continues to be an important source of water for communities within the Salt River Valley served by the Reclamation Project. Today, the TNF produces an average of 350,00 acre-feet of water each year, while the Reclamation Project has capacity to store more than 2 million acre-feet.25 In 2015, 56 percent of the water used by the City of Phoenix came from the Salt and Verde Rivers, and the Tonto National Forest.26 In keeping with its purpose, the TNF must be managed to maximize the productivity of the watershed, facilitate ongoing Reclamation Project operations and maintenance and enable SRP to meet water and energy supply needs and challenges through the development of innovative

water and hydropower solutions.3. The Agreements among SRP, TNF and Reclamation are Intended to Ensure that the Purposes of the Reclamation Project will be Furthered, Integrated with, and Not Compromised by Forest Management Activities.The 2017 Master Interagency Agreement Number 86-SIE-004 between Reclamation and the Forest Service ('2017 Master Agreement") requires that the TNF and Reclamation collaborate on planning, developing, operating, and maintaining Reclamation projects and related programs located on or affecting lands and resources administered by the Forest Service.27 The 2017 Master Agreement further provides for Forest Service planning and implementation of activities on NFS lands within the total area of Reclamation project influence.28 The Tri-Party Agreement likewise requires the TNF, Reclamation and SRP to collaborate regarding forest management.29 The specific purpose of the Tri-Party Agreement is to set guidelines for coordinating the activities of SRP, Reclamation, and the TNF, and thereby ensure that multiple uses, public recreation, aesthetic protection, enhancement of wildlife, planning,
management, environmental compatibility, public access and use, and security of Reclamation Project works, will be undertaken and maintained consistent with the responsibilities of each of the parties.In its previously filed comments, SRP urged the TNF to refrain from encumbering withdrawn or adjacent lands with management designations that would preclude Reclamation and SRP from exercising their authority under the Reclamation Act, the 1917 Agreement, or the Tri-Party Agreement in furtherance of Reclamation Project purposes. As we noted in our comments, Reclamation Project infrastructure and facilities located within withdrawn and adjacent areas are essential to the reliable and sustainable operation of water storage facilities and electric power generation and transmission. Unencumbered access to these areas is essential to performing these functions and will only become more important in the coming decades as the Reclamation Project facilities on the Salt River enter their second century of service.SRP appreciates the Forest Plan's exclusion of withdrawn lands within the TNF from wilderness recommendations and "wild and scenic" classifications. At the same time, the Forest Plan recommends the CMRWA site as wilderness. The recommendation does not properly consider the importance of these "adjacent areas" to the fulfillment of the Congressionally authorized Reclamation Project purposes. As explained in this objection, we remain concerned that the recommendation of the CMRWA site as "wilderness" will interfere with the maintenance of Reclamation Project facilities. Equally important, the recommendation imposes insurmountable obstacles to the Reclamation Project's development of power infrastructure that would increase the generation of renewable and carbon free energy. The recommendation conflicts with the original intent of Congress in authorizing the Reclamation Project and would hinder the ongoing efforts of the White House, U.S. Department of Agriculture ("USDA"), Forest Service, Reclamation and SRP to reduce carbon emissions.4. The Continued Development of Hydropower and Power Infrastructure is Critical to the Fulfillment of the Congressionally Authorized Reclamation Project Purposes, particularly at a Time When Arizona's Water and Power Resources are in Short Supply and Climate Change is Worsening this Shortage.The water and power industry in Arizona and the Southwest is constantly evolving. Reclamation and SRP need flexibility to access, operate, and maintain Reclamation Project facilities on TNF-managed lands. Increased demand for renewable energy generation, coupled with projected growth in SRP's reservoir district will require SRP to upgrade and replace aging infrastructure or develop new infrastructure. Moreover, expansion of Reclamation Project infrastructure, including the potential development of additional pumped storage capacity, on "adjacent" lands managed by the TNF should be expected. SRP is committed to working with the TNF and other stakeholders to ensure that the Reclamation Project's essential water storage and power generation functions will serve Arizona's resource needs. However, SRP is concerned that the Forest Plan will restrict SRP's ability to develop, operate, and maintain hydropower generation and power infrastructure necessary to meet the growing population and changing climate of Arizona in the future.As SRP transitions to renewable generation resources, the expansion of the Reclamation Project to incorporate larger capacities of pumped storage is crucial. Reclamation has recognized that pumped storage is "one of the most useful methods for regulating intermittent renewable generation resources such as wind and solar."30 Wind and solar energy sources are subject to natural variability that can create challenges for integration into the larger power grid. Wind and solar generation can change suddenly which affects moment-to-moment power output and increases the balancing requirements of dispatchable resources. Peak wind and solar generation also typically occur during off-peak demand periods and are not sufficient during the hours of SRP's peak load. Pumped storage is an efficient means to store energy when power is available and to generate power with the stored energy when it is needed. The Reclamation

Project currently includes a 119 MW pump-back storage unit at Horse Mesa Dam and a 57 MW pump-back storage unit at Mormon Flat Dam. However, increasing the pumped storage capacity on the Reclamation Project would allow SRP to increase the use of renewable energy to meet customer energy demands, replace existing fossil fuel generating facilities, improve grid reliability, and avoid potential interruptions in energy supply.In the 2014 Reclamation PSP Study, Reclamation sought to identify locations at Reclamation- owned reservoirs where a pumped storage project may be technically, environmentally, and economically viable and could contribute to meeting renewable energy and greenhouse gas reduction objectives in the future. The study identified two locations within the TNF utilizing Apache Reservoir, including the Apache Lake PSP Site as a top ranked option. The Apache Lake PSP Site has the potential to generate between 1,100 and 2,200 MW of pumped storage hydropower capacity for an energy storage duration of 10-12 hours. Reclamation owns 348 reservoirs across 17 western states. Reclamation first screened the 348 reservoirs for potential pumped storage projects based on the size of the active storage pool and topography. Reclamation identified 203 alternatives at 60 sites and developed conceptual layouts, cost opinions, operational, regulatory, and environmental screenings, and economic evaluations for 108 alternatives. The Apache Lake PSP Site, which is located in the CMRWA, was ranked third out of 108 alternatives (See Figure 1, below). SRP urges the TNF to adopt a plan that enables Reclamation and SRP to evaluate and, if feasible, develop pumped storage infrastructure at the Apache Lake PSP Site, to support the reliable expansion of renewable energy for central Arizona. As discussed in Section C, these efforts would stall if the CMRWA site is retained in the TNF Plan as recommended wilderness.Figure 1 depicts the general location of the upper reservoir for the Apache Lake PSP Site (Apache 1B pump storage configuration considered by Reclamation in the 2014 Reclamation PSP Study. Portions of the Apache Lake PSP Site and surrounding area necessary for access fall within the CMRWA.5. SRP Shares the Goals of the White House, USDA, Forest Service, and Reclamation to reduce Carbon Emissions over time as a Strategy, in part, to address the Impacts of Climate Change; Areas such as the CMWRA are key to SRP meeting those Goals.The Biden Administration has placed a high priority on interagency efforts to reduce carbon emissions and increase resilience to the effects of climate change through the deployment of "clean energy technologies and infrastructure."31 In keeping with that prioritization, the recently passed Inflation Reduction Act incentivizes stand-alone energy storage projects such as the pumped storage project under
consideration.32 Responding to these directives, the Department of the Interior continues to prioritize the decarbonization of the nation's economy and the full transition to a clean energy future.33 The USDA has expressed similar intentions to increase climate resiliency in the West by improving watersheds and water supply in rural areas. 34 Likewise, the Department of Energy has recommended an analysis of incentives for modernizing the "existing hydropower fleet, powering non-powered dams, and development of pumped storage hydropower" to aid in the clean energy revolution.35Cohesive climate action across multiple agencies markedly intersects with SRP's longstanding hydroelectric power production. SRP is committed to expanding its renewable energy resources and to reduce its fossil fuel energy resources to reduce carbon emissions in ways consistent with this comprehensive federal agenda addressing the climate crisis. SRP expects to transform its power generation resource portfolio over the coming decade and beyond to address climate challenges and achieve the sustainability goals established by SRP's Board of Directors. SRP's sustainability goals include reducing carbon intensity of its generation portfolio by 90% from 2005 levels by the year 2050, reducing waste and improving sustainability of its supply chain, and enhancing customer programs and options while maintaining grid reliability and customer satisfaction. In addition to addressing sustainability concerns, the anticipated changes to SRP's power resource portfolio are driven by the significant increase in demand expected in SRP's service territory.SRP will achieve these twin objectives through multiple initiatives, including the retirement of aging carbon-emitting generation resources and the coordinated deployment of renewable generating resources and grid-scale energy storage. To date, SRP has retired 1,300 MW of baseload coal generation from its portfolio, and SRP has committed to retiring an additional 1,300 MW by 2032. SRP's latest Resource Plan also includes nearly 7,000 MW of solar generation and over 6,000 MW of 4-hour battery storage online by 2033 to ensure grid reliability. As SRP retires baseload resources and adds significantly more solar to its power system, there will be a need for longer-duration energy storage to conserve excess solar generated during the day and dispatch it overnight, thereby ensuring reliable electric service around the clock. SRP hydroelectric generation in the TNF through the implementation of pumped storage projects thus furthers the mutual interests of the Reclamation Project and the

federal agencies in climate resiliency and renewable energy technology.C. SRP's Objections to the Forest Plan's Designation of the CMRWA as a Special Management Area.1. The Recommendation to Designate the CMRWA as Recommended "Wilderness" Would Inhibit SRP's Efforts to Develop the Apache Lake PSP Site for Pumped Storage Hydropower in Furtherance of Congressionally Authorized Reclamation Project Purposes and Compromise SRP's Efforts to Maintain and Improve Aging Water and Power Infrastructure in or Adjacent to the Site.SRP previously submitted comments to the TNF regarding Recommended Wilderness Areas ("RWA") during the Plan Revision Process. As indicated in its previous comments, SRP generally supports the recommendation for additional wilderness areas within the TNF and the TNF's selection of Alternative B (modified) in the Draft ROD.36 However, SRP believes that the inclusion of the CMRWA in the National Wilderness Preservation System ("NWPS") would inhibit the ability of the Reclamation Project to achieve Congressionally authorized purposes, including the addition of long duration energy storage assets at the Apache Lake PSP Site. Fundamental to the TNF's purpose is the management of TNF lands to enable the fulfillment of the Reclamation Project's purpose, as provided in the 1905 Presidential Proclamation and management agreements among SRP, TNF and Reclamation. As the 2014 Reclamation PSP Study emphasizes, the Apache Lake PSP Site (located with the CMRWA) presents one of the best opportunities for pumped storage development across Reclamation's 348 reservoirs in the western United States. SRP also believes there are strong alternative TNF lands to the CMRWA site that meet the criteria for wilderness outlined by the TNF planning documents. For these reasons, SRP requests that the TNF revise the Draft ROD to exclude the CMRWA site from selected Alternative B (modified). TNF may consider adding alternative Wilderness Area recommendations considered through the Forest Planning Process.The Draft ROD should be revised to omit the CMRWA from the selected Alternative B (modified) because inclusion of the area in the NWPS is inconsistent with the management direction of the Forest Plan.37 As described in the Forest Plan, the TNF intends to manage Recommended Wilderness Areas ("RWA") to retain or improve the wilderness characteristics of these areas if and until they are considered for designation by Congress. They are, in effect, to be managed as designated wilderness areas until such time as Congress acts on a formal designation. Given the restrictive management of RWAs, recommending the CMRWA for inclusion in the NWPS would inhibit furthering feasibility investigations at Horse Mesa within the Apache Lake PSP Site.The Multiple-Use Sustained-Yield Act ("MUSYA") and the National Forest Management Act ("NFMA") require the TNF to manage lands for multiple uses.38 The Draft ROD expresses an intention to balance multiple uses, including recreation opportunities, natural resource management, economic contributions, partnerships, and designated and recommended management areas. The inclusion of the CMRWA in Alternative B (modified) deviates from this objective. The decision to recommend the CMRWA is not in the best interest of the American public as it would frustrate SRP's efforts to increase deployment of renewable resources and reduce carbon emissions. We submit that a modification by the TNF to remove the recommendation of CMRWA site would be more consistent with the MUSYA and NFMA objectives.The Forest Plan identifies the Desired Conditions (RWMA-DC), Standards (RWMA-S) and Guidelines (RWMA-G) ("DCSGs") for the management of RWA in the TNF.39 RWMA-S-03 states that "[n]ew energy developments or authorizations shall not be permitted within recommended wilderness areas."40 And RWMA-G-08 states that "[n]ew permanent improvements should not be authorized in recommended wilderness areas unless necessary for public health and safety, resource protection, or viability of valid existing rights and authorized uses."41 If the CMRWA site is required to be managed under these constraints, the permissions required from the TNF to further investigate the feasibility of the Apache Lake PSP Site, regardless of any other considerations will be inhibited. Consequently, the direct benefits to central Arizona of such a pumped storage project in enabling large-scale solar development and the broader benefits to the American public of reduced carbon emissions would be inhibited by the Forest Plan, which would likely prohibit TNF from authorizing SRP to construct a pumped storage project within the CMRWA or any other future improvements to the Reclamation Project itself within the CMRWA. Given the CMRWA's proximity to the Reclamation Project works on the Salt River and other facilities along the Apache Trail, this scenario is deeply concerning to SRP.Climate change, together with the growing demand for water and renewable electric power in central Arizona, are requiring SRP to evaluate upgrades of the water and power infrastructure within or adjacent to the CMRWA. The existing Reclamation Project facilities have been in operation since the first half of the 20th century and the next century of successful service will require continued maintenance and upgrade of facilities. To continue to meet the Congressionally authorized purposes of the Reclamation Project, including potential

upgrades to water and power infrastructure, such as the contemplated development of the Apache Lake PSP Site, it is likely that construction activities, infrastructure placement, and the expansion of existing rights-of-ways ("ROW"), within the CMRWA would be required.SRP recognizes that these activities could require a National Environmental Policy Act ("NEPA") process and special use permits, depending on the relationship of such infrastructure to the Reclamation
Project. However, these types of facilities already exist in the vicinity of the CMRWA and are critically important to the continued economic vitality of the Salt River Valley. Once constructed, these facilities would require regular maintenance, reconstruction, and upgrades in the future. A buffer between the CMRWA and existing infrastructure simply is not adequate to make possible the future construction of a pumped storage project to combat climate change or other expansion needs along this very essential power line corridor. Thus, SRP believes that the inclusion of the CMRWA in Alternative B (modified) is inconsistent with the decision rationale articulated in the Draft ROD and requests that the entirety of the CMRWA be removed as a recommendation.2. The CMRWA does not Support a Wilderness Recommendation Considering the Specific Information Provided Herein about the Apache Lake PSP Site and Applying the Wilderness Characteristics CriteriaSRP also suggests that TNF's evaluation of the CMRWA's wilderness characteristics should yield a different result considering the information provided about the Apache Lake PSP Site. Chapter 70 of the Forest Service Land Management Planning Handbook ("FSH") 1909.12 describes the process and criteria used by TNF to determine whether the CMRWA site should be recommended for "wilderness" designation and inclusion in the NWPS pursuant to the Wilderness Act.42 The process has four steps: (1) inventory; (2) evaluation; (3) analysis; and (4) recommendation. In Spring 2017, the TNF began an inventory of lands within the forest that "may be suitable for inclusion in NWPS." In October 2017, the TNF evaluated the areas identified in the inventory and ranked the areas based on their wilderness characteristics. The criteria used by the TNF to evaluate and rank the areas were derived from the "definition of Wilderness provided in the Wilderness Act of 1964," identified in FSH 1909.12, Chapter 70, Section 72.1. TNF also utilized input from the TNFs resource specialist and the public.43 Each polygon was assigned an "overall ranking of the wilderness characteristic it possesse[d]: HIGH, MODERATE, LOW, or NO."44 Rankings were determined using a point system based on the "apparent naturalness, opportunities for solitude or unconfined recreation, and manageability" of each polygon.45For the CMRWA (polygon 32), the TNF determined that the area had a "HIGH" level of wilderness characteristics based on a perfect score of 12 points.46 SRP submits that applying such criteria to the CMRWA based on the specific information provided in this letter, including the areas the proximity to existing project works, Reclamation Withdrawn Lands, and the potential for use of the Apache Lake PSP Site for a pumped storage project, supports a conclusion that the CMRWA should not be designated as recommended wilderness.D. ConclusionSRP recognizes the tremendous effort that has gone into TNF Plan Revision Process and greatly appreciates the opportunity to comment on the Forest Plan, FEIS, and Draft ROD. The development of this Forest Plan is very important to SRP due to our operation of the Reclamation Project and the many laws and agreements that define the collaborative relationship among SRP, Reclamation and the TNF. Our objection focuses on the specific aspects of the Forest Plan that we believe would frustrate the fulfillment of Reclamation Project purposes, specifically, the development and delivery of reliable, sustainable water and power. If you or your team have any questions, please do not hesitate to contact Kara Montalvo, Director Environmental Services, at 602-236-5256 (Kara.Montalvo@srpnet.com) or Ron Klawitter, Senior Principal Water System Projects, at 602-236-2182 (Ronald.klawitter@srpnet.com) for technical questions.

FOOTNOTES

1 See Tonto National Forest Land Management Plan (March 2022); see also Final Environmental Impact Statement for the Land Management Plan (March 2022); and Draft Record of Decision for the Tonto National Forest Land Management Plan (March 2022).2 As the Forest Service is aware, before the creation of the TNF, Reclamation withdrew from public entry a corridor of lands along the Salt River for development of water and power infrastructure associated with the Reclamation Project.3 The CMRWA and its proximity to existing Reclamation Project works and Reclamation Withdrawn Lands is shown in Attachment A.4 See Reclamation-Wide Pumped Storage Screening Study, U.S. Department of Interior, Bureau of Reclamation Power Resources

Office (September 2014) ([ldquo]2014 Reclamation PSP Study, Attachment B).5 The TNF began revising its Forest Plan in 2014 using the 2012 Planning Rule for the National Forest System (herein the [ldquo]Plan Revision Process[rdquo]).6 See SRP Comments on the Notice of Intent to Revise the Tonto National Forest Land and Resource Management Plan and Preparation of the Associated Environmental Impact Statement (May 18, 2017).7 See SRP Comments on the Proposal to Provide Special Designations for Water Bodies on the Tonto National Forest (June 5, 2017).8 See SRP Comments on the Tonto National Forest Draft Inventory Map for the Wilderness Recommendation Process (October 10, 2017).9 See SRP Comments on the Tonto National Forest Preliminary Proposed Land and Resource Management Plan (January 10, 2018).10 See SRP Comments on the Tonto National Forest Draft Evaluation Map for Wilderness Recommendation Process (February 12, 2018).11 See SRP Comments on the Tonto National Forest Wilderness Recommendation Process (May 22, 2018).12 Regarding areas on the TNF [ldquo]surrounding or adjacent to[rdquo] Reclamation Project reservoirs (Roosevelt, Apache, Canyon, Saguaro, Bartlett, and Horseshoe), the comments requested that these [ldquo]be eliminated from consideration for Wilderness designation under the wilderness criteria (apparent naturalness, solitude, and manageability).[rdquo]13 A [ldquo]final evaluation map[rdquo] posted to the TNF website in May 2018 depicted more than 100 potential wilderness sites within the TNF, including the lands within the subsequently designated CMRWA. At this stage, the TNF had not yet identified which areas would be carried forward for further evaluation as wilderness. During [ldquo]Step 3[rdquo] of TNF[rsquo]s process, the agency subsequently reviewed the entirety of the evaluated sites and made internal decisions about what to carry forward into alternatives in the draft EIS. Those decisions were not revealed to the public until publication of the draft environmental impact statement ([ldquo]EIS[rdquo]) for the Forest Plan.14 See SRP Comments on the Tonto National Forest Draft Land Management Plan and Draft Environmental Impact Statement (March 12, 2020).15 See SRP Objection under 36 C.F.R. [sect] 219.54 to the Tonto National Forest Final Land Management Plan, Final Environmental Impact Statement, and Draft Record of Decision; Nos. MB-R3-12-13, MB-R3-12-14, and MB-R3-12-15 (May 24, 2022).16 See Id.17 See Contract between United States of America and Salt River Valley Water Users[rsquo] Association (September 6, 1917).18 See Id.19 See Reclamation Act of 1902, 43 U.S.C. [sect] 371 et seq. (Chap. 1093, 32 Stat. 388).20 See First Form Withdrawal on March 2, 1903 ([ldquo]the channel of [the] Salt River from the mouth of Tonto Creek to the mouth of Verde River, and all land lying within one mile thereof[rdquo] from public entry.[rdquo]; See First Form Withdrawal on July 20, 1905 (the Acting Secretary of the Interior withdrew public lands [ldquo][t]hree miles from [the] Salt River on the south side, from the mouth of Tonto Creek to the mouth of the Verde River.[rdquo]); See First Form withdrawal on July 27, 1903 (the Acting Secretary of the Interior withdrew land surrounding the Horseshoe Dam site; See First Form withdrawal on December 14, 1904 (the Acting Director withdrew a [ldquo]strip of land one mile wide on each side of the Verde River[rdquo] stretching from the Fort McDowell Yavapai Reservation to Fossil Creek.21 See Proclamation No. 598, 34 Stat. 3166 (October 3, 1905).22 See Id ([ldquo]Excepting from the force and effect of this proclamation all lands which may have been, prior to the date hereof, embraced in any legal entry or covered by any lawful filing duly of record in the proper United Stated Land Office.[rdquo]).23 See Forest Plan, at 4.24 Id.25 Id.26 See Id.27 The 2017 Master Agreement replaced and succeeded similar agreements between the Forest Service and Reclamation in 1948 and 1972.28 See 2017 Master Agreement.29 See Tri-Party Agreement.30 See 2014 Reclamation PSP Study.31 Exec. Order No. 14008, 86 Fed. Reg. 7619 (February 1, 2021).32 See National Hydropower Association Statement on Passage of Inflation Reduction Act (August 16, 2022) https://www.hydro.org/news/nha-statement-on-passage-of-inflation-reduction-act/.33 Press Release, Interior Department Outlines Roadmap for Continued Renewable Energy Progress on Public Lands, (Apr. 20, 2022) Interior Department Outlines Roadmap for Continued Renewable Energy Progress on Public Lands |U.S. Department of the Interior (doi.gov); Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process, Sec. Order No. 3399, (Apr. 16, 2021) SO 3399 Climate Crisis _Transparency and Integrity to Decision-Making Processes (doi.gov).34 Press Release No. 0240.21, U.S. Dept. of Agriculture, Statement from Agriculture Secretary Tim Vilsack on the Passage of the Infrastructure Investment and Jobs Act, (Nov. 6, 2021) Statement from Agriculture Secretary Tom Vilsack on the Passage of the Infrastructure Investment and Jobs Act | USDA.35 DEPT. OF ENERGY, AMERICA[rsquo]S STRATEGY TO SECURE THE SUPPLY CHAIN FOR A ROBUST CLEAN ENERGY TRANSITION, U.S. DEPARTMENT OF ENERGY RESPONSE TO EXECUTIVE ORDER 14017, [ldquo]AMERICA[rsquo]S SUPPLY CHAINS[rdquo] (Feb. 24, 2022) America[rsquo]s Strategy to

Secure the Supply Chain for a Robust Clean Energy Transition FINAL.docx_0.pdf.36 See Draft ROD at 10. (Recommending five Recommended Wilderness Areas (106,441 acres) for inclusion in the National Wilderness Preservation System: (1) Gun Creek Recommended Wilderness; (2) Boulder Recommended Wilderness (3) Coronado Mesa Recommended Wilderness; (4) Red Creek Recommended Wilderness; and (5) Mullen Mesa Recommended Wilderness)37 See Draft ROD at 12.38 See 16 U.S.C. [sect][sect] 528[ndash]31; see also 16 U.S.C. [sect][sect] 1600[ndash]14.39 See Forest Plan at 136.40 Id. at 137.41 Id.42 See 16 U.S.C. [sect][sect] 1131[ndash]36 (The [ldquo]Wilderness Act[rdquo]).43 The criteria used to evaluate inventoried areas within the TNF are described in the [ldquo]Final Evaluation Process Documentation and Criteria for the Tonto National Forest Wilderness Recommendation Process.[rdquo] (herein [ldquo]Evaluation Criteria[rdquo]).44 See Evaluation Criteria at 645[ldquo]NO = 0-2.99, LOW = 3-5.99, MODERATE = 6-8.99, HIGH = 9+. See Id.46 Twelve points is the maximum score possible.Attachment AMap of CMRWA and Proximity to Project Works and Reclamation Withdrawn LandsAttachment BReclamation-Wide Pumped Storage Screening Study Final ReportSeptember 2014 Bureau of Reclamation