



CREDA

Colorado River Energy Distributors Association

ARIZONA

Arizona Municipal Power Users Association

Arizona Power Authority

Arizona Power Pooling Association

Irrigation and Electrical Districts
Association

Navajo Tribal Utility Authority
(also New Mexico, Utah)

Salt River Project

COLORADO

Colorado Springs Utilities

CORE Electric Cooperative

Holy Cross Energy

Platte River Power Authority

Tri-State Generation & Transmission
Association, Inc.
(also Nebraska, Wyoming, New Mexico)

Yampa Valley Electric
Association, Inc.

NEBRASKA

Municipal Energy Agency of Nebraska
(also Colorado)

NEVADA

Colorado River Commission
of Nevada

Silver State Energy Association

NEW MEXICO

Farmington Electric Utility System

Los Alamos County

UTAH

City of Provo

City of St. George

Heber Light & Power

South Utah Valley Electric Service District

Utah Associated Municipal Power Systems

Utah Municipal Power Agency

WYOMING

Wyoming Municipal Power Agency

Leslie James

Executive Director

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March 21, 2025

The Honorable Bruce Westerman
Chairman
House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20515

RE: HR 1897, the ESA Amendments Act of 2025

Dear Chairman Westerman,

On behalf of the Colorado River Energy Distributors Association (CREDA), I write to express my appreciation and support for your legislation, H.R. 1897, the ESA Amendments Act of 2025.

CREDA is a regional association of the not-for-profit customers of the federal Colorado River Storage Project (CRSP). CREDA members serve over 4.1 million customers in the Colorado River Basin, and represent the majority of the CRSP hydropower customers.

CREDA's members hold contracts with the Western Area Power Administration for delivery of hydropower generated by the CRSP system and have long supported and paid for Endangered Species Act (ESA) activities to protect endangered and threatened species in the Colorado River. Since 1993, CRSP power customers have funded over \$586 million for the Upper Colorado and San Juan Recovery Implementation Programs (RIPs) and the Glen Canyon Dam Adaptive Management Program (GCDAMP). A positive result of these efforts was the 2021 downlisting of the humpback chub from endangered to threatened. Since downlisting, the Grand Canyon population of humpback chub has continued to grow and thrive, with estimates increasing from approximately 12,000 adult fish centered mostly around the confluence of the mainstem and Little Colorado River (USFWS 2020) to nearly 100,000 adult fish now found in two population centers; one still at the confluence with the Little Colorado River and the other further downstream in western Grand Canyon. Another endangered fish species native to the Colorado River, the razorback sucker, was similarly proposed for downlisting by the U.S. Fish and Wildlife Service in 2021 and its status remains under review at this time.

The ESA Amendments Act would help realize the benefits of recovering species while avoiding costly experiments, duplicative efforts, and regulatory uncertainty for stakeholders that live and work in areas where protected species are found.

Currently, CREDA members are concerned about experimental actions that began last summer at Glen Canyon Dam to protect humpback chub from predatory and invasive smallmouth bass that appear to be establishing below the dam. In 2024, the Bureau of Reclamation finalized a Record of Decision and began implementing bypass flows that reduced hydroelectric production at Glen Canyon Dam. The experiment, while aimed to disrupt smallmouth bass below the dam, implemented the most extreme course of action when other options may have been capable of producing similar beneficial effects at much lower costs. Meanwhile, as noted above, the humpback chub continues to flourish, with much scientific uncertainty as to what real risk smallmouth bass establishment below the dam may pose to this

humpback chub population further downstream in Grand Canyon.

Provisions of the ESA Amendments Act (such as Sec. 301) are focused on maintaining clear standards for species recovery. These provisions advance an objective to delist species like the humpback chub when they no longer need protections under the ESA. Delisting the humpback chub would help provide regulatory certainty to stakeholders that depend on Colorado River water and power resources. Other provisions, including requiring transparency in critical habitat designations (Sec. 401) and providing an analysis of impacts and benefits of determinations of endangered or threatened status for species (Sec. 405) would also help to focus regulatory actions on relevant criteria.

Finally, requiring federal agencies to establish objective, incremental recovery goals for species in preparation for down- and de-listing species (Sec. 301) would help lead to recovery and removal of healthy and flourishing species from the endangered and threatened species lists.

CREDA endorses the ESA Amendments Act of 2025 as common-sense legislation that balances species conservation and recovery with water and power reliability in the Colorado River Basin. We believe that under this legislation, protected species in the Basin will continue to thrive and even be removed from the ESA list, which could lead to an end of voluntary experimental actions by Federal agencies that raise the cost of electrical power while also lowering the reliability of the electric grid for millions of people in the West.

Sincerely,

Leslie James

Leslie James
Executive Director

Cc: CREDA Board

