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*Submitted via Email (CRinterimops@usbr.gov)*

Genevieve Johnson  
Reclamation 2007 Interim Guidelines SEIS Project Manager  
Upper Colorado Basin Region  
125 South State Street, Suite 8100  
Salt Lake City, Utah 84138

**RE: Near-term Colorado River Operations Revised Draft Supplemental EIS Notice of Intent To Prepare a Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations For Lake Powell and Lake Mead; RR03010000, 22XR0680A1, RX.18786000.5009000**

Dear Ms. Johnson:

On November 17, 2022, the Bureau of Reclamation (Reclamation) published in the Federal Register the Notice of Intent to Prepare a Supplemental Environmental Impact Statement (SEIS) to modify the December 2007 Record of Decision entitled “Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead” (2007 Interim Guidelines<sup>1</sup>. Subsequently, on April 14, 2023, Reclamation issued a Draft SEIS that analyzed two alternatives which allocated reductions 1) based on the concept of priority or 2) distributed in the same percentage (*pro rata*) across all Lower Basin water users.<sup>2</sup> That Draft SEIS was withdrawn by Reclamation on May 22, 2023, when the Lower Basin States submitted a proposed alternative for Reclamation to analyze and consider, as well as a request that Reclamation analyze alternatives using updated hydrology. The Lower Basin Plan<sup>3</sup> proposed a total of three

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<sup>1</sup> 87 FR 69042, (November 27, 2022)

<sup>2</sup> Near-term Colorado River Operations, Draft Supplemental Environmental Impact Statement, § 2.7 & 2.8, (April 14, 2023)

<sup>3</sup> Lower Basin Plan Letter - May 22, 2023, <https://www.doi.gov/sites/doi.gov/files/lower-basin-plan-letter-5-22-2023.pdf>

million acre-feet of conservation through 2026 to protect critical levels at Lake Mead, and the Upper Division States joined in a seven states letter recommending that the Lower Basin Proposal be analyzed.<sup>4</sup>

The Salt River Project (SRP) appreciates the opportunity to provide comments in response to the Revised Draft SEIS for Near-Term Colorado River Operations, published in the Federal Register on October 27, 2023.<sup>5</sup> SRP has a material interest in procedures that will provide for reliable operations, minimize future risk, and protect critical elevations in Lakes Powell and Mead through the duration of the existing operational guidelines.

SRP is comprised of the Salt River Valley Water Users' Association (Association, formed in 1903) and the Salt River Project Agricultural Improvement and Power District (District, formed in 1937). The Association and the District collectively operate the Salt River Federal Reclamation Project (Project) which is the Phoenix metropolitan area's largest raw water supplier, delivering more than 800,000 acre-feet annually to municipal, urban and agricultural water users. The Project also includes one of the nation's largest not-for-profit public power systems, through which SRP provides electrical power to more than one million customers in the Phoenix area and certain rural areas of central Arizona. As both a water and power provider, SRP has an interest in the operational aspects of water and power deliveries from the Colorado River system. Although SRP delivers water from the Salt and Verde Rivers, the nature of the water supply portfolios of users throughout central Arizona results in an interconnectedness between water providers.

SRP supports the Proposed Action alternative outlined in Section 2.7 of the Revised Draft SEIS and commends the efforts of the Lower Basin States and Reclamation to develop an alternative that protects critical elevations without imposing mandatory reductions that would have serious detrimental impacts. The Proposed Action alternative outlined in the Revised Draft SEIS incorporates the elements of the Lower Basin Plan submitted in May 2023. The modeling done by Reclamation using updated hydrology indicates that the voluntary conservation contemplated in that alternative, and largely effectuated through agreements that have already been finalized, is sufficient to avoid Lake Mead or Lake Powell dropping below critical elevations within the near-term timeframe of 2026. The Proposed Action alternative avoids mandatory reductions beyond what has been agreed to in the 2007 Interim Guidelines and 2019 Drought Contingency Plan.

One remaining area of concern is the potential impacts to hydropower. SRP recommends additional consideration of any cumulative impacts associated with this process, as well as other

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<sup>4</sup> Seven States Letter - May 22, 2023, <https://www.doi.gov/sites/doi.gov/files/seven-states-letter-5-22-2023.pdf>

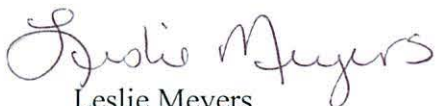
<sup>5</sup> 88 FR 73840. <https://www.federalregister.gov/documents/2023/06/16/2023-12923/notice-of-intent-to-prepare-an-environmental-impact-statement-and-notice-to-solicit-comments-and>



concurrent federal processes. Section 2.8.8 discusses the considered but eliminated Hydropower Prioritization Alternative and states that “the Proposed Action contemplates protection of critical reservoir levels and the continued resulting water deliveries that accordingly relate to the ability to generate hydropower.” SRP is not suggesting an alternative that prioritizes hydropower over *all* other purposes; however, it is important to account for cumulative impacts to hydropower from other ongoing processes, such as those associated with Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) SEIS<sup>6</sup>. SRP provided extensive comments to the LTEMP SEIS relating to the impact to the Phoenix metropolitan area if there were to be a reduction in available capacity from federal hydropower during times of peak need.<sup>7</sup> At a minimum, SRP suggests consideration of the cumulative hydropower impacts associated with the LTEMP SEIS to account for the full range of possible outcomes in that process beyond the specific sub-annual water release parameters (base and experimental “flow actions”) currently identified in the Revised Draft SEIS.

SRP appreciates the ongoing efforts by stakeholders across the Colorado River Basin to protect the viability of water and energy resources that so many people rely on every day. The Proposed Action alternative will continue to protect Lake Powell and Lake Mead from reaching critical elevations, and the voluntary conservation effort and associated federal funding are to be commended. SRP appreciates the opportunity to comment on this important next step for the Colorado River system and would be happy to provide further information on any of the issues addressed in this letter or comments submitted by others. Please contact Zack Heim at Zack.Heim@srpnet.com or (602) 236-0589 with any questions you have.

Sincerely,



Leslie Meyers

Associate General Manager for Water Stewardship  
Salt River Project

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<sup>6</sup> 88 FR 68667, [Federal Register :: Notice of Intent To Prepare a Supplemental Environmental Impact Statement for the December 2016 Record of Decision Entitled Glen Canyon Dam Long-Term Experimental and Management Plan](#)

<sup>7</sup> [https://www.usbr.gov/uc/DocLibrary/EnvironmentalImpactStatements/GlenCanyonDamLong-TermExperimentalManagementPlan/LTEMP-SEIS-ScopingComments/021\\_Salt%20River%20Project\\_508.pdf](https://www.usbr.gov/uc/DocLibrary/EnvironmentalImpactStatements/GlenCanyonDamLong-TermExperimentalManagementPlan/LTEMP-SEIS-ScopingComments/021_Salt%20River%20Project_508.pdf)

