

## U.S. Bureau of Reclamation

Reclamation 2007 Interim Guidelines SEIS Project Manager

Sent via electronic mail to [CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov)

December 11, 2023

Re: San Diego County Water Authority Comments – Revised Draft SEIS for Near-term Colorado River Operations

### Dear Project Manager for 2007 Interim Guidelines SEIS,

The San Diego County Water Authority (Water Authority) appreciates the opportunity to respond to the Bureau of Reclamation’s (Reclamation) published October 27, 2023, Federal Register Notice (notice) seeking comments on the revised draft Supplemental Environmental Impact Statement (SEIS) for Near-term Colorado River Operations. Specifically, Reclamation intends to issue a modified Record of Decision (ROD) for the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines). This revised draft SEIS is a change to the original SEIS issued in April in that it recognizes improved hydrologic conditions in the Basin and a new alternative focused on voluntary conservation provided by the Lower Basin states in May 2023 as part of a consensus-based proposal.

The Water Authority, in alignment with our partners on the Colorado River Board of California, agrees with Reclamation’s decision to eliminate the two action alternatives analyzed in the original draft SEIS and focus on the Lower Basin proposal (identified as the Proposed Action). We recognize the revised draft SEIS also includes a no-action alternative that would rely on the reductions established under the 2007 Interim Guidelines and the 2019 Drought Contingency Plan. However, given the continued instability of the river due to drought and climate change, it is prudent to analyze efforts to bolster the river through a system of voluntary conservation funded through the Inflation Reduction Act as contemplated in the Proposed Action.

Further, we are pleased to have an active role in helping California achieve its portion of the Proposed Action this year as part of a joint agreement between the Water Authority, the Imperial Irrigation District, and the Metropolitan Water District of Southern California. Under this agreement, the Water Authority has agreed to forgo 50,000 acre-feet of its Quantification Settlement Agreement (QSA) supplies to be set aside to support the river. Discussions are

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underway to potentially extend this three-party agreement beyond 2023. This kind of collaborative approach and flexibility is essential to addressing the river’s challenges in a mutually beneficial way as opposed to any steps that would strictly focus on mandated reductions.

As the Water Authority joins with our partners in voicing support for the Proposed Action, there remain issues that must be addressed through the final SEIS and modified ROD, which are acknowledged by Reclamation in the revised draft SEIS. Those points include:

- **Recognition of impacts to the Salton Sea:** Unlike the original draft SEIS, the revised draft considers the potential for impacts to the sea from increased system conservation, noting that the Proposed Action could expedite, but not result in additional, exposure of lakebed. However, the revised draft does not adequately address the environmental justice impacts to the communities around the sea or the Torres Martinez Desert Cahuilla tribe whose land is located next to the sea. It is critical that Reclamation recognizes those impacts and that adequate funding be awarded to address the need for environmental mitigation above what is already being provided under the QSA.
- **Acknowledgement of socioeconomic justice impacts:** The revised draft acknowledges the potential for socioeconomic impacts from increased system conservation, and notes there is insufficient data to determine if proposed funding for this conservation would adequately address such impacts. Using the QSA as a model, Reclamation should consider the need for specific socioeconomic funding to support the potential impacts caused by voluntary decreased water use.
- **The need for adequate Inflation Reduction Act funding:** While the revised draft references that the Proposed Action is consistent with congressional actions to fund conservation, it does not address funding levels in any detail or timelines for providing that funding. Such details might be subject to ongoing negotiations, but recognition that those issues are key to the success of the Proposed Action should be included.
- **Incorporate flexibility and collaborative regional planning:** In placing focus on the Proposed Action in the revised Draft SEIS, Reclamation should emphasize the need for and benefits of incorporating flexibility and collaborative regional planning. The three-party agreement between the Water Authority, IID, and MWD is based on a collaborative model for sharing supplies in a mutually beneficial way and demonstrates the kind of flexibility that will be encouraged in the future and the ability to achieve it with existing resources.

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The Water Authority applauds Reclamation's decision to issue the revised draft SEIS with a focus on the Proposed Action. It is a key step toward supporting more consensus-based, flexible thinking that will be critical for near term and long term river operations and regional planning. Thank you for the opportunity to respond during this public comment period, and we look forward to continuing to engage in these processes.

Sincerely,



Dan Denham  
General Manager

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