



DECEMBER 11, 2023

To: The Bureau of Reclamation  
[CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov)

Re: Revised Draft Supplemental Environmental Impact Statement for Near-term Colorado River Operations

On behalf of Comité Civico del Valle (“Comité”), thank you for the opportunity to submit these comments to the Bureau of Reclamation (“Bureau”) regarding the Revised Draft Supplemental Environmental Impact Statement (“RDSEIS”) for Near-term Colorado River Operations. Comité reiterates the concerns shared in its June 12, 2023 letter regarding the Draft Supplemental Environmental Impact Statement. In particular, the deficiencies in mitigation of impacts to disadvantaged communities in the Imperial Valley. Additionally, we have concerns about the evaluation of potential impacts to the Salton Sea in the RDSEIS, as discussed below.

As a recent Department of Energy (“DOE”) analysis found, the amount of lithium potentially extractable from beneath the Salton Sea significantly exceeds prior estimates.<sup>1</sup> Lithium extraction and processing uses substantial quantities of water. The DOE report found that “Regionally, the water demand for currently proposed geothermal production and lithium extraction facilities is modest, increasing demand for the region’s historical Colorado River supply by ~3%. Due to the megadrought in the Colorado River basin, any increase in the region’s water demand should be carefully evaluated.” The agreement between the states for near-term reductions evaluated in the RDSEIS does not contemplate meeting the water needs of the lithium industry. Any deals made between California’s contractors (e.g., Imperial Irrigation District, Palo Verde Irrigation District, Metropolitan Water District) and lithium companies could result in additional environmental and socioeconomic impacts. This is a reasonably foreseeable scenario that should be evaluated in the RDSEIS.

Moreover, as noted by other commenters (see, for example, comments from Jenny E. Ross), the RDSEIS does not adequately assess impacts on the Salton Sea should 2024-2026 hydrologic conditions become very dry. As the Near-Term environmental impact analysis was triggered by sustained dry conditions creating risks to water supply and power generation, it is irresponsible for the Bureau to dismiss the possibility that critical conditions could rematerialize over the next three years.

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<sup>1</sup> See Permalink  
<https://escholarship.org/uc/item/4x8868mf>, accessed December 10, 2023.

The Bureau should not defer a full analysis of Salton Sea impacts to its post-2026 environmental impact statement. The tribes and disadvantaged communities living in proximity to the Salton Sea deserve a complete and transparent assessment of how their region may fare under the full potential range of hydrologic conditions.

Comité looks forward to reviewing the Final EIS and participating in any meetings and workshops the Bureau may hold to solicit input on how to manage the Colorado River on behalf of communities and a healthy environment in an era of accelerating climate change. Please provide all relevant notices by email and writing to Adrinna Teran (235 Main Street Brawley, CA 92227; [adrinna@ccvhealth.org](mailto:adrinna@ccvhealth.org)) and Jordan Sisson (3993 Orange St., Ste. 201, Riverside, CA 92501; [jordan@jrsissonlaw.com](mailto:jordan@jrsissonlaw.com)).