



December 8, 2023

U.S. Bureau of Reclamation
2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region
125 South State Street, Suite 8100
Salt Lake City, Utah 84138

Via email: CRinterimops@usbr.gov

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

To whom it may concern:

Sonoran Institute is a 33-year-old conservation organization that works to ensure that the Colorado River is managed in a more holistic, inclusive, and adaptive fashion to benefit communities and wildlife in the US and Mexico. We have a long history of facilitating dialogue in the Colorado River Basin with rural landowners, small towns, water districts, cities, Tribes, and government agencies in developing collaborative approaches to management of land, water, and the species they support.

We would like to thank the Bureau of Reclamation (“Bureau”) for acknowledging the seriousness of the problem we all face. The Supplemental Environmental Impact Statement (SEIS) is intended to address rapidly growing shortages of Colorado River water in the near term by going beyond the commitments outlined in the 2007 Interim Guidelines and the 2019 Drought Contingency Plans. The Bureau’s action is a recognition that current commitments and prescribed approaches are inadequate and jeopardize continued power generation and water delivery capacities at Glen Canyon and Hoover dams. Therefore, we support the Bureau’s initiative to revise Colorado River management to avoid a crisis of infrastructure and water supply in the near term.

We offer the following comments:

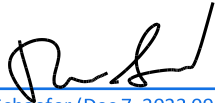
1. The SEIS states that "intensive efforts are underway to facilitate water conservation actions in the Basin under a number of programs." However, the degree to which water conservation will ameliorate problems based on yet-to-be determined actions is unknown unless the Bureau enters into agreements with entities engaged in water conservation efforts.
2. The allocation of Colorado River water to Mexico is governed by the 1944 Water Treaty. To assess the potential effects of the alternatives in this SEIS, certain

modeling assumptions are used that display projected water deliveries to Mexico. The Bureau should consult with Mexico regarding these modelling assumptions and their implications for water deliveries to Mexico and potential strategies to mitigate impacts of reduced deliveries.

3. We also recommend that the Bureau institute a formal, regularly scheduled consultation process with state governments, Tribes, and Mexico to determine if mid-course corrections to models and operating guidelines will be required based on actual hydrological conditions and conservation measures.
4. We encourage the Bureau to implement a regular dialogue with the general public in order to share status, issues that are arising, and solicit general feedback on the process.

Sonoran Institute stands ready to assist the Department of the Interior in meeting the future challenges facing the Colorado River. We have a long history and continued approach to facilitating dialogue with basin stakeholders and have established a trusted dialogue of collaboration through our network of urban, tribal, and agricultural partners in the US and Mexico.

Signed,



[Richard A Schaefer \(Dec 7, 2023 09:28 MST\)](#)

Richard Schaefer
Chair, Board of Directors
Sonoran Institute



Mike Zellner
Chief Executive Officer
Sonoran Institute