



# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

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**VIA EMAIL AT [CRINTERIMOPS@USBR.GOV](mailto:CRINTERIMOPS@USBR.GOV) AND U.S. MAIL**

December 20, 2022

Reclamation 2007 Interim Guidelines SEIS Project Manager  
Upper Colorado River Basin Region  
125 South State Street, Suite 8100  
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[CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov)

Dear Ms. Johnson:

**Subject: Supplemental Environmental Impact Statement (SEIS) Scoping Comment**

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment on the 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 (NOI). 87 FR 69043 (November 17, 2022). As a willing and active participant on the River, CVWD appreciates the full magnitude of hardship that the hydrology has created for the Colorado River users, and the significant work that is in front of us to maintain the viability of the system.

CVWD recognizes that if the low run-off conditions into Lake Powell and Lake Mead continue, the U.S. Bureau of Reclamation's (Reclamation) multiple objectives of protecting dam infrastructure, generating hydropower, and providing full water deliveries may require operating Glen Canyon and/or Hoover Dam under conditions not contemplated in the 2007 Interim Guidelines Record of Decision. CVWD also cautions that any modifications to Lake Powell and Lake Mead operations need to consider and preserve the intricate web of applicable federal laws, interstate compacts, decrees, intrastate agreements, and water delivery contracts that govern reservoir operations and water deliveries.

As part of the NOI process, it is anticipated three primary alternatives will be considered by Reclamation -- 1) No Action, 2) Reservoir Operations Modification, and 3) Framework Agreement. CVWD strongly supports the Framework Agreement Alternative as it is a consensus-based set of actions that builds on the existing framework for Colorado River Operations, including commitments included in the 2019 Drought Contingency Plan (DCP) and under Component 1a (voluntary compensated conservation program) of the 2022 Inflation Reduction Act (IRA).

At the recent Basin States Principals meeting (December 13, 2022), there was unanimous agreement to work towards a consensus-based decision. There have been various proposals to stabilize and ultimately to increase elevations in Lake Powell and Lake Mead which need careful consideration. In general, the concepts fall within the goals of achieving a set of agreed-on operating volumes within:

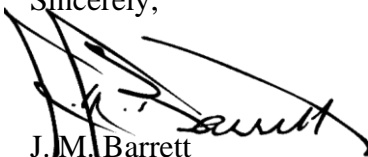
- the Colorado River system (Basin-wide),
- the Upper and Lower Basins, and
- the States

CVWD is committed to actively engaging in these discussions, and specifically supports the following concepts that balance the need to extend the operations of the reservoirs while recognizing the importance of preserving existing laws and agreements.

- 1) Use the “safe-yield” approach as described by comments submitted by the Colorado River Board of California.
- 2) Use a voluntary, compensated framework to achieve the desired conservation goals.
- 3) Analyze a range of hydrologic scenarios to allow for adaptive management of a full spectrum of operating conditions.
- 4) Limit the minimum deliveries at Glen Canyon Dam to 7.0 million acre-ft (maf) only as an option of last resort to ensure compliance with the obligations of the 1922 Colorado River Compact.
- 5) Recognize the importance of balancing the needs of the human health and safety (HHS) water while respecting the priority system established by existing laws and agreements.
- 6) Allow the discussion that is needed to achieve the concept mentioned above to take place within each State to work within the framework of existing agreements.

CVWD believes that the pathway to success for the preferred alternative should build on and expand the DCP parties’ commitment to collectively work together to protect the reservoirs, including additional and/or new approaches to meet the DCP goals. CVWD has been a willing participant with our partners on the River and Reclamation and is committed to our full engagement on this important assignment. Please contact Dr. Robert Cheng at 760-398-2661 or [rcheng@cvwd.org](mailto:rcheng@cvwd.org) if you have questions or comments.

Sincerely,



J.M. Barrett  
General Manager