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

Dear Project Manager,

On November 17, 2022, the Bureau of Reclamation (Reclamation) published the Federal Register notice¹ for 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). The Salt River Project (SRP) has an interest in the actions developed through the public-scoping process to implement near-term actions to stabilize the decline in reservoir storage in Lakes Powell and Mead and prevent system collapse. SRP appreciates the opportunity to provide comments on this important SEIS.

SRP is comprised of the Salt River Valley Water Users' Association (Association) and the Salt River Project Agricultural Improvement and Power District (District; collectively, SRP). The Association, formed in 1903, and the District, formed in 1937, collectively operate the Salt River Federal Reclamation Project ("Project") which is the Phoenix metropolitan area's largest supplier of raw water, 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 that derives 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.

As the Bureau initiates efforts to revise operating guidelines for the operation of Glen Canyon and Hoover Dams in the 2023 and 2024 operating years in order to address the potential for continued low runoff conditions in the Colorado River, analyzing the ancillary impacts of the revisions will be important. Water users across the basin are interconnected, and impacts cannot be analyzed without consideration of all pertinent impacts. SRP's comments focus on a

¹ 87 FR 69042, (November 27, 2022)

few of those areas of concern, namely (i) health and safety impacts on water users, (ii) evaporation and system loss allocations, (iii) international opportunities, and (iv) hydropower impacts.

SRP believes that the health and safety impacts water users will experience as a result of the actions proposed in the SEIS must be considered, along with the related socioeconomic effects of those actions. The use of short- and long-term underground water storage mechanisms provide flexibility to water providers and allows those providers to reliably and affordably deliver water in two of the largest metropolitan areas in the region and serve as an important source of water for regional industries such as semiconductor manufacturing. SRP has partnered with municipalities and industry to store Colorado River water and has been coordinating with those partners to effectuate recovery of that water to offset reductions resulting from the most recent Colorado River shortages. The actions under consideration should be crafted in a manner that do not impact the ability to use underground storage to add flexibility and maintain water for the health and safety of both people and industry.

As Reclamation analyzes reducing releases from Glen Canyon and Hoover Dams below the 7 million acre-feet outlined in the 2007 Interim Guidelines, the SEIS should also consider the appropriate calculation of evaporation and system losses (ESL). An ESL assessment should be applied equally to all water users to most fairly allocate the reductions to the system. SRP supports the comments by the Arizona Department of Water Resources and Central Arizona Project that applying ESL selectively to only some water users is shortage administration. The net reservoir losses, river losses, and regulatory wastes should be assessed to all water users who benefit from the storage and delivery infrastructure.

The United States and Mexico recently celebrated 200 years of binational cooperation. This long history of international partnership includes agreements such as Minute 323, wherein the State of Arizona, SRP, Central Arizona Project, and Mexico agreed to explore desalination opportunities. The longstanding diplomatic relationship between the two countries will be critically important as the hydrology on the Colorado River system continues to necessitate swift action to avoid system failure. As such, the SEIS should analyze additional reductions to Mexico commensurate with those proposed in the United States as a resource for stakeholders in the U.S. and Mexico. The International Boundary and Water Commission is ultimately responsible for treaty negotiation and implementation, but an analysis under the SEIS would be beneficial in informing future discussions.

Finally, hydropower impacts must be considered as revisions to operating guidelines for Glen Canyon and Hoover Dams are analyzed in the SEIS. The Western grid faces increasing reliability risks. A further reduction in available hydropower will add to those challenges. SRP's reduced access to hydroelectric power resources in the Colorado River system negatively impacts both direct contracts for that power, as well as the ability to effectuate exchanges that rely on the availability of that power.



As the Bureau initiates efforts to revise operating guidelines to address the possibility of continued low flow runoff conditions in the Colorado River, SRP urges careful consideration of the ancillary impacts such revisions will have on water users throughout the basin. Water users across the basin are interconnected, and impacts cannot be fully analyzed without consideration of all pertinent interests. SRP submits these comments with that in mind. SRP appreciates the opportunity to provide input and would be happy to provide further information on any of the issues addressed in this letter or comments submitted by others. Please contact Megan Martin, at megan.martin@srpnet.com or 602-236-2693 with any questions you may have.

Sincerely,



Leslie Meyers

Associate General Manager & Chief Water Resources Executive