



SONORAN  
INSTITUTE

December 16, 2022

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

Email: [CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov)

*Re: 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*

To whom it may concern:

Sonoran Institute is a 32-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.

Through our Growing Water Smart Program, we provide training and technical assistance to communities in the Colorado River Basin to address water supply-demand gaps and advocate for policies that promote water conservation and re-use of stormwater, treated wastewater, and agricultural return flows in urban settings. We also have pioneered river restoration efforts in the Basin, including the Colorado River Delta and Santa Cruz watershed, demonstrating the feasibility and benefits of large-scale restoration and policies that allocate water and funding for such efforts.

We would like to thank the Bureau of Reclamation (“Bureau”) for acknowledging the seriousness of the problem we all face. As we develop policy that will govern the Colorado River in years to come, it is imperative that we acknowledge that the river has never had the volume originally apportioned under the 1922 Colorado River Compact, that the current volume is declining rapidly, and that we may never return to the flows that we have been accustomed to in previous decades.

Sonoran Institute acknowledges that 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.

The SEIS as proposed will consider various river flow and release scenarios and their impact on water levels in Lake Powell and Lake Mead. These scenarios will be used to assess modifications to flow deliveries the Bureau may undertake to maintain water levels that ensure power generation and water deliveries. Such modifications will primarily involve reduced water deliveries to Lower Basin states and Mexico. The SEIS is intended to build an administrative record for actions to be taken by the Bureau in response to growing near-term Colorado River water shortages.

The Bureau anticipates modifications for the 2023-2024 period and that could potentially serve as input for assessing subsequent years' water management. It is hoped that the information and analysis provided through this SEIS will serve as input to the Post 2026 Operating Guidelines review and completion. Given the likely persistence of reduced flows for the foreseeable future, we strongly recommend that the Bureau develop and evaluate all of its flow scenarios at least through 2026 if not for a 10-year period.

In the webinars summarizing the purpose of these modifications, the Bureau presented a range of flows upon which to base its proposed actions. We recommend that the Bureau base at least one of its scenarios for its management alternatives on the 2002-2005 period as this reflects the lowest flows recorded during the Millennial Drought (2000-2022).

In its webinars, the Bureau identifies the potential need to reduce flow estimates by an additional 20%. While we agree that a further reduction is prudent for all scenarios given the volatility and uncertainty associated with projecting future flows, we are unclear as to how this percentage estimate was reached and request additional documentation for this proposed percentage reduction.

For example, is this intended to capture estimated system evaporation and transit losses? Does it take into account water to meet federal environmental commitments such as federally reserved water rights for in-stream flows and the Lower Colorado River Multi-Species Conservation Plan? Does it take into account tribal water rights? At a minimum, these three factors must be accounted for in the Bureau's scenario-building process and management alternatives as part of the SEIS.

It is our view that the Bureau will ultimately need to base its management alternatives on both the lowest flow estimates and the above three factors. In doing so, the Bureau will begin to take a more holistic and river basin approach to managing the Colorado River while allowing for reservoir replenishment, generation of hydropower, meeting tribal water settlements, and protecting the ecosystem values of the river. This would represent an important precedent for development of the Post 2026 Operating Guidelines.

Sonoran Institute values the opportunity to inform the processes for developing the SEIS. Sonoran Institute is a part of the western landscape and community. We live and work here, and we are committed to being engaged in ensuring that our water future is based on good science, transparent process, equitable apportionment of impacts and benefits, and engaged decision-making. We look forward to working together in the months and years to come to meet the immediate needs in the Colorado River Basin and to ensure long-term sustainability for the people, plants, and other species within the basin.

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, as members of the binational Raise the River

Coalition and through our Growing Water Smart Program and have established a trusted dialogue of collaboration through our network of urban, tribal, and agricultural partners in the US and Mexico.

Signed,

A handwritten signature in blue ink, appearing to read "Mike Zellner", with a long horizontal flourish extending to the right.

Mike Zellner  
Chief Executive Officer  
Sonoran Institute