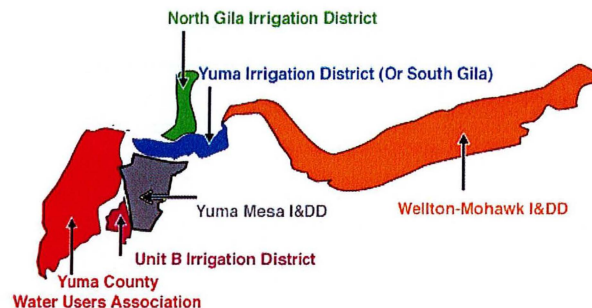


## Yuma County Agriculture Water Coalition

Wellton Mohawk Irrigation and Drainage District  
Yuma County Water Users Association  
Yuma Mesa Irrigation and Drainage District  
Yuma Irrigation District  
North Gila Valley Irrigation and Drainage District  
Unit B Irrigation and Drainage District



December 20, 2022

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Reclamation 2007 Interim Guidelines SEIS Project Manager

**Re: Yuma County Agriculture Water Coalition – Comment on Department of Interior Notice of Intent to Prepare Supplemental Environmental Impact Statement**

To Whom It May Concern:

The Yuma County Agriculture Water Coalition (the "Coalition") is a coalition of five irrigation districts and one water users association operating and delivering water in Yuma County, Arizona, and one water district operating and delivering water in Bard, California. All of its members have entitlements to the Colorado River, ranging from some of the most senior Present Perfected Rights and Priority 1 rights to Priority 3 water rights.

On November 17, 2022, the Department of Interior through the Bureau of Reclamation published its intent to prepare a Supplemental Environmental Impact Statement for the Colorado River 2007 Operating Guidelines. In its Notice, the Bureau stated that it would be looking at three (3) alternatives: (1) No Action, (2) a Framework Agreement, and (3) Reservoir Operations Modification.

The Coalition submits the following comments in response to the proposed Notice of Intent to Prepare a Supplemental Environmental Impact Statement for the 2007 Guidelines:

### The "No Action" Alternative Is Not an Option

Given current hydrology and the likelihood that the Colorado River system will crash, a "No Action" alternative is not a viable option. While running an analysis of what would occur in the Basin if nothing is done might be demonstrative of the severity of the situation, it should not be considered one of the options for how we move forward.

### Operational Considerations

The following are a list of operational recommendations:

- Any operational decisions should be an overlay and/or build on the existing Law of the River.
- Any operational decisions or actions should not carve out new uses or entitlements or increase or expand existing entitlements.
- A range of possible hydrologies should be used in modeling using CRSS and/or

- Riverware, including climate adapted hydrologies.
- Mexico should share in any mandatory reductions at a rate equal to other reductions made across the Basin.
  - An Upper Colorado River Accounting System similar to the Lower Basin Decree Accounting program needs to be implemented in the Upper Basin.
  - Release volumes should be tied to reservoir elevations.
  - System Losses
    - o Any allocation of system losses should occur across the Colorado River Basin, and include Mexico.
    - o An allocation of system losses should consider distributing system losses to water users according to priority.
  - Power
    - o The SEIS should assess cumulative impacts of flow reductions on hydropower generation at Glen Canyon Dam (Colorado River Storage Project), Hoover Dam and the Parker-Davis Project. Specifically, the SEIS should assess impacts to the ability of the Bureau of Reclamation and the Western Area Power Administration (WAPA) to meet their “must-serve” federal obligation to the Priority or Project Use Power (PUP) users in the Yuma area.
    - o Hydropower customers are contractually obligated to pay for all of the costs associated with generation and transmission at these federal facilities, along with a host of other non-power costs, assigned to power by Reclamation, that help support important water, environmental, flood control, and recreational benefits. The consideration of impacts should include an assessment of the financial impacts to Federal hydropower customers – replacement costs, lost system revenues, etc.
    - o Federal funding should be provided to assist hydropower customers with the impacts of decreased revenue and increased costs.
  - Environment
    - o The SEIS should strongly consider social justice impacts on rural agricultural communities – job losses, economic impacts, economic dislocation, and impacts on rural minority communities.
    - o The SEIS should assess the cumulative impacts of existing Colorado River programs on flow and riparian environment, not just conclude that impacts are within the range of normal operations.
    - o Any additional mitigation required as a result of operation changes should add to and/or improve existing programs, not add new programs.
    - o Any expense related to such additional mitigation should be a system or Federal expense and should not be borne by the water users.

The Coalition also asks that the Department of Interior and Bureau of Reclamation consider the timing of any decision to enact major operational changes. Given Yuma agriculture’s operations and growing seasons, a decision to make significant operational changes mid-year would be devastating to the Yuma area.

### Health and Human Safety

Reductions in water deliveries to the Yuma area will cause significant impacts not only to the Yuma area itself, but also across the country. From food growing activities to military

operations, Yuma plays a major role in the national security of the United States.

The Yuma growing region is responsible for 90% of the winter vegetables for the United States, reliably feeding hundreds of millions of families and providing food security to the Nation. The Yuma area also produces dates, citrus, wheat, alfalfa and other forage crops year round. If water to the Yuma area is reduced, the Yuma area, the State of Arizona and the country will see reduced production and, therefore, an impact to local economies and likely to the availability of food nationwide.

Yuma agriculture has been proactive in conserving water for decades. Over the last 40 years, investments in water conservation have resulted in Yuma farmers have reduced their water usage by 15-18%, all while doubling yields, doubling the acres of crops grown, and increasing the economic value of the area by 700%. As a result of these efforts, leveraging new tools and techniques, and utilizing winter-centric crop patterns, Yuma agriculture has achieved 90% efficiency in irrigation.

Water is used efficiently and its use produces 1 billion servings of leafy greens and vegetables each week from November through April, and a number of other agricultural crops the rest of the year.

There is no question that the use of water by Yuma agriculture is a beneficial use.

Maintaining water deliveries to the Yuma area insures the health and safety of not only the Yuma area but also to the country.

The Coalition and its members reserve the right to submit additional comments throughout the SEIS process.

The Coalition and its members will continue to work with the Bureau of Reclamation, the Basin States and other stakeholders to address the serious and difficult challenges we face on the Colorado River.

Should you have any questions or need additional information, you can reach out to Wade Noble, Coordinator, at [wade@noblelaw.com](mailto:wade@noblelaw.com) or Meghan Scott, Assistant Coordinator, at [meghan@noblelaw.com](mailto:meghan@noblelaw.com).

Sincerely,



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