



August 31, 2022

Ms. Carly Jerla
Senior Water Resources Program Manager
United States Bureau of Reclamation
CRB-info@usbr.gov

RE: Request for Input on Development of Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead Under Historically Low Reservoir Conditions Document No. 2022-13502

Dear Ms. Jerla:

The Southern California Water Coalition has reviewed the Request for Input on Development of Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead Under Historically Low Reservoir Conditions published in the Federal Register (FR Doc. 2022-13502) by the United States Bureau of Reclamation (Reclamation) on June 24, 2022.

The Southern California Water Coalition was created in 1983, in response to drought, to coordinate the activities of counties, special districts, and the business community in the stewardship and protection of Southern California's water supplies. Our members come from Kern, Ventura, Los Angeles, Orange, San Bernardino, Riverside, Imperial and San Diego Counties.

California receives the majority of the water supplies from the Lower Basin of the Colorado River—4.4 million acre feet (MAF) of the 7.5 MAF allocated to the Lower Basin. Allocation and delivery of Colorado River was essential to the historic development of Southern California, and is essential to the state's economy, and national agricultural supply and economy.

Prior to formally initiating a National Environmental Policy Act (NEPA) process (or processes) to develop post-2026 operations for Lake Powell and Lake Mead (among other potential actions), Reclamation is requesting input on: (a) processes that can be employed to encourage and facilitate meaningful participation of Colorado River Basin (Basin) partners, stakeholders, and the general public in the anticipated upcoming NEPA process(es); as well as (b) potential substantive elements and strategies for post-2026 operations to consider in the anticipated upcoming NEPA process(es).

As such, the Southern California Water Coalition has a direct interest in the planning and development of Reclamation's new operating guidelines. This letter contains the Coalition's comments as a potentially affected collection of entities.





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1. Processes to encourage meaningful participation of Colorado River Basin (Basin) partners, stakeholders, and the general public in the anticipated upcoming NEPA process

- **Stakeholders.** It is critical that all relevant stakeholders be engaged, including the Basin States, Basin contractors, the Republic of Mexico, Indian tribes, water users, non-governmental organizations, ratepayers, and the affected public. As noted above, the Southern California Water Coalition is a collection of entities within a key region of California with significant interests in the post-2026 operations.
- **Virtual Participation.** It is recommended that opportunities for virtual participation continue, like what was done for this pre-scoping process. Advertising on multiple social media platforms and providing virtual platforms for participation will make the process more accessible to stakeholders and the public.

2. Potential substantive elements and strategies for post-2026 operations to consider in the anticipated upcoming NEPA process

- **Law of the River.** The post-2026 operations should be consistent with the Law of the River and other applicable provisions of federal law. In addition, the burdens associated with protecting the Colorado River System from the impacts of poor hydrology and climate change should be shared across all sectors and water users.
- **Improve management and operations of the system under low storage and run-off conditions.** The post-2026 rules need to protect the system from effects of aridification and the persistent drought that is exacerbated by climate change. The Colorado River system is operating out of balance with available supplies and this imbalance has contributed to rapidly depleting storage levels in Lakes Powell and Mead. All water users share risk from these conditions and the post-2026 rules should ensure that the burdens associated with managing that risk are shared by all water users. The post-2026 rules should increase certainty and reliability by providing predictability in a variety of hydrologic and storage conditions across the basin.
- **Framework for augmentation and exchanges.** The need for augmentation in the Colorado River Basin is widely recognized. Several opportunities exist in the Colorado River basin with the potential for augmentation, including ocean desalination, brackish water desalination, reuse and recycling projects, and importation. All relevant stakeholders should be able to partner with one another on regional augmentation projects, and be assured they can access the water generated.





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3. Exchanges could be one mechanism to expand the benefits to a broader range of water users. The post-2026 operations should consider the potential for exchanges relating to augmentation projects that could help address the supply and demand imbalance on the Colorado River system.

- **Efficiency measures.** Significant developments have been made in the Colorado River Basin toward developing innovative conservation programs and policies to sustain current and future supplies. With extended drought conditions expected to continue into the foreseeable future, demand management and efficient use of water will play a key role in the Colorado River basin.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future notices and documentation for this project. Please feel free to contact me at cwilson@socalwater.org or at (949) 632-2074, if you have any questions regarding the Southern California Water Coalition's comments

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Wilson".

Charles Wilson
Executive Director

