



**Comments Submitted in Response to the June 24, 2022
Federal Register Notice
Bureau of Reclamation Request for Input on Development of
Post-2026 Colorado River Reservoir Operational Strategies
September 1, 2022**

The Colorado River Indian Tribes (CRIT) submit the following comments as requested in the referenced Federal Register notice of June 24, 2022.

Process for engagement with Tribes in the Colorado River Basin

This process should not be difficult. The Tribes should be included in all substantive meetings to develop the next set of operational guidelines. The CRIT do not want to be **informed** of the decisions made or agreements reached with the Basin States. It is critical that we be in the meetings and provide our voices to shape those decisions and agreements. Because our water use is accounted for as part of each state's apportionment, does not mean we are state water users, within the jurisdiction of state water laws, or that the states know or understand our interests in the Colorado River.

Viewing CRIT as a water user or stakeholder, the volume of our water right is very significant in the Lower Basin and our annual water use is similar to that of Southern Nevada Water Authority. We have contributed to decision making in the past, and we will continue to offer substantive contributions both to development of policy and by making wet water available for the River. We cannot participate in decision making if we are not included.

Send us, and the other tribes in the basin, the same meeting notices that you send other water users and the states.

Process for NEPA

The 2007 Environmental Impact Statement for the Interim Guidelines relies on information provided by the Bureau of Indian Affairs (BIA) to determine impacts to cultural resources and other potential economic and resource impacts to tribes. This is not appropriate. Each tribe with ancestral lands and ties to the River must be visited and provided an opportunity to provide appropriate cultural, economic, and resource related information. This process may begin now.

Substantive Elements of Post-2026 Operations

The current hydrology and statements by the Commissioner indicate that the continued flow of the Colorado River is at risk, both through the Grand Canyon and from Hoover Dam through our Reservation. The Guidelines must include sufficient protections for continued flows from Glenn Canyon Dam to the lowest reaches of the River throughout the year. The Life of the River and all that depend on its waters must be preserved and protected.

Health and Safety Volumes of Water

This standard for measuring minimum volumes of available water must include tribal communities, many of whom have far less water available for their people.

If there is a need for further information, please contact the CRIT Attorney General at Rebecca.loudbear@crit-nsn.gov.