

**Central Arizona Water Conservation
District**
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Phoenix, Arizona 85024

Southern Nevada Water Authority
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Las Vegas, Nevada 89106

**The Metropolitan Water District of
Southern California**
700 North Alameda Street
Los Angeles, California 90012-2944

March 6, 2024

The Honorable Camille Calimlim Touton
Commissioner
U.S. Bureau of Reclamation
1849 C Street, NW
Washington, D.C. 20240

Sent via Electronic Mail

Dear Commissioner Touton:

The Southern Nevada Water Authority (SNWA), Central Arizona Water Conservation District (CAWCD) and The Metropolitan Water District of Southern California (Metropolitan) (collectively the “Water Districts”) submit this letter in support of the Lower Basin Alternative for the Post-2026 Coordinated Operation of the Colorado River Basin (Lower Basin Alternative).

A. Background of the Water Districts

The Water Districts provide water to 27 million residents in the Lower Basin. Each Water District takes delivery of water from Lake Mead pursuant to contracts with Secretary of the Department of the Interior. The Colorado River is a significant or exclusive source of water for our agencies and as such, operations of Lake Powell and Lake Mead are directly relevant to our ability to provide water to our service areas.

SNWA is a political subdivision of the State of Nevada that provides Colorado River water to its purveyor-member agencies throughout southern Nevada. Colorado River water comprises nearly 90 percent of these water supplies, which serve the needs of the Las Vegas area’s 2.3 million residents and more than 40 million tourists each year. SNWA sources, treats, and delivers wholesale water to its purveyor members and oversees regional conservation-programs implementation.

CAWCD is a political subdivision of the State of Arizona, established pursuant to Arizona Revised Statutes § 48-3701 et seq., which operates the Central Arizona Project (CAP) pursuant to various contracts and agreements with Reclamation. The CAP canal is a 336- mile system that brings Colorado River water to central and southern Arizona, delivers the State of Arizona’s single largest renewable water supply, and provides water to municipalities, tribes and agriculture. CAWCD’s service area encompasses Maricopa, Pinal and Pima counties where more than 80% of Arizona’s population resides. CAP supply is a critical component of many Arizona tribal water right settlement agreements and provides tribal homeland water to meet the needs of tribal communities in Arizona.

Metropolitan is a political subdivision of the State of California that serves as a wholesale water provider to a 5,250 mile service area in Southern California. After being formed in 1928 by election and an act of the California legislature, Metropolitan's first project was to build the Colorado River Aqueduct (CRA). Metropolitan continues to bring Colorado River water into Southern California through the CRA. The Colorado River has been Metropolitan's most secure source of imported water since the district was formed and continues to be a vital source of water supply for the 19 million residents in Metropolitan's service area.

Since the 2007 Interim Guidelines were adopted, the Water Districts have been working individually and in partnership to adapt to the stresses on the Colorado River system resulting from drought and climate change. During this period, even as the Lower Basin experienced substantial population growth, overall Colorado River water use has actually been declining.

For example, over more than 20 years, Southern Nevada Water Authority (SNWA) has been a leader in conserving Colorado River water supply and planning for a future with less water. This includes an investment of more than \$300,000,000 in conservation programs, reducing southern Nevada's consumptive use of Colorado River water by more than 115,000 acre-feet per year since 2002 – or more than a third of Nevada's entire apportionment - even as its population has increased by nearly 800,000 people.

In Arizona, the Central Arizona Water Conservation District (CAWCD) has conserved over 2 million acre-feet in Lake Mead in collaboration with CAWCD water users and dedicated nearly \$47 million to projects in Arizona that resulted in an additional 600,000 acre-feet of storage in Lake Mead.

In Metropolitan's service area in Southern California, water use per capita has declined about 40% since the peak. Metropolitan has invested \$910 million for conservation programs like the turf replacement program that has transforming more than 200 million square feet of thirsty lawns into sustainable landscapes. Metropolitan is currently collaborating with SNWA and CAWCD in planning a regional recycled water project (Pure Water Southern California) that would be one of the largest recycled water projects in North America.

In addition, the Water Districts have partnered with other water users to conserve Colorado River water and reduce the risk of Lake Mead declining to critical elevations. Those efforts have included the 2014 Memorandum of Understanding, the Pilot System Conservation Program, Minutes 319 and 323 with Mexico resulting in the creation of Binational Intentionally Created Surplus, the 500+ Plan and the 2019 Drought Contingency Plan. Through all these efforts, Reclamation and the Interior Department have been our partners, and we remain committed to continuing that partnership.

B. Support for the Lower Basin Alternative

The Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Guidelines) are expiring as the Colorado River enters the twenty-fifth year of drought. The impacts of the drought have been exacerbated by climate change with hotter and drier conditions resulting in reduced run-off into the River and significant declines in Colorado River storage. These alarming conditions far exceed what was anticipated

under the 2007 Guidelines and have led to an increased imbalance between water supply and demand on the Colorado River. These factors further emphasized the need for new and innovative approaches to managing the Colorado River system. As the United States recognized in the Scoping Report for Post-2026 Colorado River Reservoir Operations, “[b]ased on operational experience since 2007, the current guidelines are not robust enough to manage in a way that is sufficiently protective of the resources dependent on the Colorado River.”

The Lower Basin Alternative takes a fresh look at system operations and proposes a new, innovative, and robust approach to managing the River and its critical infrastructure. This fresh look builds on the foundation of the Law of the River and proposes a more holistic and sustainable approach to managing the Colorado River system reservoirs. The Lower Basin Alternative shares proposed water use reductions fairly among the Lower Basin States and Mexico to satisfy the 1.5 maf of proposed reductions under most system conditions. Further, under the most critical system conditions, the Alternative shares water use reductions fairly between the Upper Basin and Lower Basin including Mexico. The Lower Basin Alternative contemplates a broad, fair, and equitable sharing of reductions such that no one state, sector or water user bears the entire burden of protecting the system.

The Water Districts support the Lower Division States’ request for Reclamation to analyze the Lower Basin Alternative for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. Further dialogue and collaboration among the Basin States, water users, Tribes, non-governmental organizations, and Reclamation will be required to work out additional details, and to achieve consensus support within each state. The Water Districts intend to work collaboratively within each of our states to achieve that consensus. The Lower Basin Alternative is an important step toward new guidelines that will ensure a healthy Colorado River system for all that rely on it.

Thank you,



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Southern Nevada Water Authority



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The Metropolitan Water District of Southern California



Brenda Burman, General Manager
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