IRRIGATION & ELECTRICAL DISTRICTS'
ASSOCIATION OF ARIZONA

Ms. Camille Touton
Bureau of Reclamation
1849 C Street NW
Washington DC 20240

August 16, 2022

Re: Colorado River Drought Operations – Now & Post-2026

Dear Commissioner Touton:

On behalf of IEDA, I must start by commending you on your bold stance at the June 14th Senate Energy and Natural Resources hearing, calling for an additional 2-4 MAF of conservation on top of the ongoing Drought Contingency Plan and 500+ Plan. Desperate times call for desperate measures!

As we enter our 23rd year of drought, one thing is certain-the current guidelines aren't working. My experience with the operation of the river has been that projections often exceed reality. In power production, energy estimates exceeded actuals so consistently that the Arizona Power Authority reduced forecasted energy by 3% for calculating the base charge. For water deliveries, yearly basin evaporation and losses of nearly 1.2 MAF are not included in the allocations. This discourages conservation at a time where every drop should count.

Arizonans understand the value of water better than most, leading in water management with its 1980 Groundwater Law. Today, Arizona has been the biggest contributor to the DCP and 500+ Plan. While I know that Arizona's recent conservation efforts are due to our "junior" status, I also know that failure on the Bureau's part to take a hard stance with California's overdrafting has put the river on the edge of a system crash. California is going to continue to do nothing until they are forced to, like the QSA in 2004. In fact, if California was made to stay at their allocation from 1990 to 2004, there would be another 9 MAF in the system (before evaporative losses).

As a Nevadan, you understand the issues with California's water appetite, which has been a threat to the other basin states since the formation of the Compact. Therefore, IEDA

encourages you to execute your purview as ***water master*** to protect the Colorado River and distribute amounts that are equitable while protecting the system from crashing.

As ***water master***, the first thing you should do is proportionately allocate yearly evaporation and losses. This alone will address roughly 1.2 MAF of the conservation you are seeking. With this inclusion, infrastructure improvements should rise to the top of the list to reduce system losses.

Second, allocations should factor in system efficiencies. I understand that every state, irrigation district, and farm field are different, but cheap and abundant water gets wasted. Reducing the availability of cheap water will increase efficiency by necessity. While it might be hard to project efficiency savings, it should be easy to tell who is wasting water and who isn't.

Third, California has an elaborate water infrastructure, which allows it to bring water from the north into the southern part of the state. It also benefits from significant wet seasons, but it is unable to capture the runoff due to lack of storage and because it sends a majority of the precipitation to the ocean to protect the environment. While a state issue and likely outside the scope of the Federal Register Notice request, California sends more water to the ocean than the entire Lower Basin Allocation, including Mexico's amount. I encourage you to discuss their water handling practices to offset their river reductions.

Fourth, I would work with the International Boundary & Water Commission to renegotiate the 1944 Water Treaty. Some would claim that the treaty has priority over present perfected rights. Prior to the initial negotiations, Mexico was using only 750,000 AC-FT. If Mexico's treaty amount of 1.5 MAF is protected and prioritized, what once was roughly 10% of the allocation, is now approximately 25% of the runoff of the last three years. At a minimum, I would seek a reduction to 1 MAF until such time as normal hydrology returns.

Fifth, recent activities in the Ukraine have highlighted the importance of food security and agriculture. The Yuma County is responsible for 90% of the winter leafy green vegetables grown in the United States. Any actions taken should balance the food security issue with the efforts to protect the river system. Therefore, we encourage you to give serious consideration to the "Save the River" proposal put forward by Yuma area growers, especially with the inclusion of $4 billion in the Inflation Reduction Act for activities outlined in the proposal.

Finally, protect hydropower to the extent possible given the existing drought. Glen Canyon Dam is at critical levels, and a poor design has limited what can be done in the short run. I know that the Bureau is performing a study to analyze options at Glen, and we look forward to those results. While participating in the Adaptive Management Work Group, I have seen attack after attack on the hydropower system in the supposed name of endangered species. Hundreds of millions of dollars have been spent on trying to protect the fish, but the ultimate end game seems to be just to build beaches for river runners. The benefit to the Western Interconnection is too valuable to continue to reduce the capacity at the dams. The 2020 California Brownouts should be proof of that.

By analyzing the last 1,000 years of tree rings in the Southwest, it appears that the Colorado River Basin experiences a drought every 150 years. These droughts last for 20 to 50 years. Time will tell if we are in the middle of the cycle or nearing the end, but until we are out of it and the reservoirs are at least 40% full, I encourage you to retain the "water master" role until we are in the clear.

Sincerely,

Ed Gerak
IEDA