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RE: Strawberry Water Users Association Comments to the Draft Environmental Impact Statement Colorado River Post-2026 Operations

Dear Commissioner Cameron:

The Strawberry Water Users Association (SWUA) writes this letter in support of the comments made by Central Utah Water Conservancy District (CUWCD) regarding the Draft Environmental Impact Statement for Colorado River Post-2026 Operations.

SWUA operates and maintains the Strawberry Valley Project (SVP), one of the very first Bureau of Reclamation projects. The SVP was constructed primarily for irrigation purposes, between 1906 and 1922. The SVP stores water from the Uinta Basin (a sub-basin of the Colorado River) in Strawberry Reservoir, and delivers that water through a trans-basin diversion to lands in southern Utah County, Utah in the Great Basin. Strawberry Reservoir originally consisted of a 283,000 acre-foot reservoir on Strawberry River, but has since been enlarged to nearly 1,000,000 acre-feet as a feature of the Bonneville Unit of the Central Utah Project. SVP water rights enjoy priority dates as early as 1904, and are held in the name of the United States, for the beneficial use of SVP shareholders and other subscribers to SVP water.

The SVP develops irrigation water for use on approximately 41,000 acres of farmland in southern Utah County. In addition to agriculture, the SVP supplies water to its member cities for secondary water purposes. The SVP also generates electrical power that helps drive the economy in southern Utah County.

SWUA was formed in 1922 for the primary purposes of assuming the operation and maintenance of the SVP, and assuming from the individual subscribers to SVP water the payment obligations associated with the SVP construction costs. SWUA currently has approximately 3,500 shareholders. Among the shareholders of SWUA are the cities of Mapleton, Springville, Spanish Fork, Salem, Payson and Genola (current collective population of 175,000).

Operation and maintenance of the SVP was transferred to the SWUA in 1926. SWUA's historic and distinct role in relation to the SVP is three-fold: 1) repayment to the federal

government, 2) operations and maintenance of the SVP, and 3) delivery of water to the headgates of irrigation companies under contract to deliver SVP water to SVP water users.

In 1991, the Bureau of Reclamation, SWUA and CUWCD agreed to contractual terms (1991 Contract) transferring operation and maintenance obligations for many of the SVP features, including the enlarged Strawberry Reservoir and the new Soldier Creek Dam, to CUWCD. CUWCD is the local sponsor of the Bonneville Unit of the Central Utah Project and is responsible to the federal government for the operation, maintenance, replacement, and repayment obligations of the Bonneville Unit, in addition to fulfilling wholesale water delivery contracts to agricultural, municipal and industrial users in the Colorado River basin, and in the Great Basin along the Wasatch Front. In the 1991 Contract, the United States and/or CUWCD allocated and guaranteed to SWUA an annual allocation of 61,000 acre-feet of water in the enlarged Strawberry Reservoir, plus 50,000 acre-feet of storage capacity for unused carryover water. This allocation shall have preference over all Bonneville Unit uses, and shall not be subject to reductions due to shortages, evaporation or other reservoir losses, minimum stream flow requirements or wildlife impact mitigation.

Though contracts, partnerships, water delivery conveyance systems and populations have changed over the last century, the SVP remains essential and continues its fundamental purpose of delivering agriculture water to generational and local family farmers and ranchers. Over the years, SWUA and its partners have adapted and increasingly become more and more flexible all while not abandoning its mission and principles to deliver agriculture water. Utah County is among the leading counties in Utah for total production agriculture cash receipts (United States Department of Agriculture – National Agricultural Statistics Service). This is made possible because of trans-basin SVP water that significantly supplements natural surface and ground water supplies. The economy of southern Utah County is vitally dependent on the SVP for water and power.

In addition, recent developments and contract negotiations with Reclamation have made it possible to utilize SVP water for municipal and industrial purposes. This comes at a time of rapid, urban development and significant population growth within the SVP boundaries. Accordingly, maintaining current SVP water delivery contracts is essential to support dramatic population and economic growth in an increasingly urbanized environment in southern Utah County.

For the reasons cited above, any changes to the operation of the Colorado River need to take into account the obligations of the United States and CUWCD to deliver water to SWUA, and the impact any failure to do so will have on the economy of southern Utah County within the service area of SWUA.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brent Money', is written over a horizontal line.

Brent Money  
President