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United States Bureau of Reclamation
Ms. Carly Jerla, P.E.
Program Manager—Post-2026 Guidelines
Crbpost2026@usbr.gov

[Via Electronic Mail]

March 2, 2026

RE: Comment letter from the Vallecitos Water District on the Draft Environmental Impact Statement, Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Dear Ms. Jerla:

The Vallecitos Water District appreciates the opportunity to provide this comment letter in response to the January 16 publication of the Draft Environmental Impact Statement, Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead for the development of the post-2026 guidelines (Draft EIS). This action comes as the guidelines that managed the river for the past 20 years, the 2007 Interim Guidelines, ended in 2025, though they still influence operations through the end of this year. We understand the goal is to produce a Final EIS this summer followed by a record of decision (ROD) to provide new operational guidelines by October 1, the start of the water year. We also understand the challenging conditions under which the new guidelines are being developed given the uncertainty caused by climate change and the historically low runoff affecting the Colorado River system. The Vallecitos Water District offers these comments to support the efforts of the Department of the Interior and the U.S. Bureau of Reclamation (Reclamation) toward developing guidelines that provide fair and balanced policies to ensure the river continues to serve all users basin wide, including tribes and Mexico.

As a member agency of the San Diego County Water Authority, we agree with points made in the Water Authority comment letter, starting with our support for the ongoing effort among the Basin states to achieve a consensus proposal for the river's operation, including management of the two reservoirs critical to California's water supply, Lakes Powell and Mead. Consensus remains the best way to achieve policies that provide a sustainable future for the river, whether the new guidelines extend over an interim 20-year period or are phased. We also support the Lower Basin's proposal to reduce annual usage by 1.5 million acre-feet (MAF) as a first step, and that there be a commitment from other Basin states to also support the river.

Steps Taken in the San Diego Region

It's important to note the steps the San Diego region has taken to not only conserve water but also generate new supplies, which reduces demands on the river. Through the efforts of the Water Authority, our agency, and all communities within the San Diego region, we've cut water use regionwide by 40 percent over the last three decades. As a member agency of the Water Authority, we invested in the Quantification Settlement Agreement, which has enabled California to live within its 4.4 MAF apportionment. We've also invested in the Carlsbad Desalination Plant, the largest seawater desalination plant in the nation, which has capacity to produce up to 56,000 acre-feet of drought proof water each year. Additionally, we helped fund the development of the region's \$1.5 billion Emergency and Carryover Storage Project to expand local reservoir capacity and to have the ability to move water when and where it's needed.

The Vallecitos Water District has also recently invested over \$15 million in water supply reliability projects, including:

- \$1.26M in 2016 to construct a direct connection to the desalination distribution pipeline, comprising approximately 26% of Vallecitos' annual water supply portfolio.
- \$733,000 in 2016 to increase pumping capacity at Vallecitos' Lift Station #1 to increase wastewater diversion to our Meadowlark Water Reclamation Facility (MRF) for treatment to recycled water standards to offset potable water use in the region.
- \$13.72M in 2024 to expand recycled water production at MRF by increasing tertiary phase capacity from 5MGD to 6.5MGD, offsetting future potable water use in the region. This Project is expected to be completed summer 2026.

The Cost to Invest in Resiliency

These investments in water generation and conservation were not made lightly. Building resiliency while reducing water use comes with a cost, which has direct impacts on water affordability. However, these investments highlight the steps our region has taken over the last 30 years, recognizing that such long-term planning in the wake of the uncertainty of a changing climate and more than 20 years of drought conditions was essential to support our region and the entire river system. These investments stand as examples for others in the Basin to follow when considering how to ensure the Colorado River can continue to serve the needs of all who depend on it.

Addressing the Need for System Flexibility

As Reclamation moves toward developing the Final EIS and ROD, the preferred alternative should include flexible strategies, most notably interstate and intrastate transfers and exchanges. These water transactions will enable Basin water users to adapt to evolving hydrologic and operational conditions. A framework for these transactions can accommodate future needs and growth in the Basin by allowing water to move within and across state lines to reach communities where it is needed most.

Seawater desalination can provide a drought-proof water supply in support of such water transactions and serve as one component of a solution for the river's long-term resiliency. Toward that end, the preferred alternative identified in the Final EIS should address the importance of seawater desalination as a mechanism that can provide for transfers and

exchanges, effectively serving as an imported water supply into the Basin. Further, the preferred alternative should specifically acknowledge the San Diego region's investment in the Carlsbad Desalination Plant and incorporate the plant as a current tool that can address water needs in areas facing water scarcity.

Process Ahead

The Vallecitos Water District understands this is a challenging process to arrive at a balanced policy that ensures the river continues to meet the needs of the 40 million people, two countries, 30 tribes and seven states that depend on it. We urge you to work toward a Final EIS that allows for flexibility while ensuring other management strategies provide a balanced basin-wide approach to the river's long-term sustainability.

We thank you for your consideration, and we look forward to your response to the comments we have made.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Gumpel', with a stylized flourish at the end.

James H. Gumpel, P.E.
General Manager
Vallecitos Water District