

**ANNUAL REPORT
ON THE
COLORADO RIVER BASIN
SALINITY CONTROL PROGRAM**

2020

**COLORADO RIVER BASIN SALINITY CONTROL
ADVISORY COUNCIL**

December 31, 2020

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BACKGROUND

Title II of the Colorado River Basin Salinity Control Act (Act) (Public Law 93-320) created the Colorado River Basin Salinity Control Program (Program), and Section 204 of the Act created the Colorado River Basin Salinity Control Advisory Council (Council). With the 2008 amendments to the Act that created the Basin States Program (BSP), the Council's consultation responsibilities have been redefined and clearly stated. The Secretary of the Department of the Interior, the Secretary of the Department of Agriculture, and the Administrator of the Environmental Protection Agency (EPA) originally approved a charter for the Council on February 6, 1976. In 2010 the Charter was revised to better reflect the Legislative changes that occurred to the Program in 2008. The Charter was most recently renewed in 2020. A copy of the current Council Charter is included as Attachment A.

The Council consists of up to three members from each of the seven Colorado River Basin States. Governors of their respective states appoint the Council members. The Council membership list as of December 31, 2020, is included as Attachment B. The Council has created a Technical Advisory Group (TAG) that it uses to provide analyses and recommendations. The TAG includes one member from each state. Its chair is appointed by the Council's Chair.

All of the Council members at this time are also members of the Colorado River Basin Salinity Control Forum (Forum). The Forum is an organization which was created in 1973 by the seven Colorado River Basin States for the purpose of interstate cooperation and to provide the states with the information necessary to comply with the Water Quality Standards for Salinity on the Colorado River and Section 303 of the Clean Water Act. The Forum, like the Council, has an advisory and analytical group which is named the Forum's Work Group (Work Group).

This report provides annual recommendations to the federal agencies concerning the progress of the Program and the need for specific actions by involved federal agencies.

This report comments on the actions taken by the federal agencies through December 31, 2020.

The report does not attempt to fully describe or analyze the Program. Readers unfamiliar with the Program should refer to *Quality of Water, Colorado River Basin, Progress Report No. 25, 2017*, and the *2020 Review, Water Quality Standards for Salinity, Colorado River System, October 2020 (2020 Review)* for a discussion of the Program. The first report is available at www.usbr.gov/uc/progact/salinity/pdfs/PR25final.pdf or by contacting Kib Jacobson, Program Manager for the Bureau of Reclamation's (Reclamation) portion of the Program. The second report is available at www.ColoradoRiverSalinity.org or by contacting Don Barnett, the Executive Director for the Forum. The addresses and phone numbers for Reclamation and the Forum are provided at the end of this report.

The Council met twice in 2020. Due to COVID, both meetings were held via Zoom. At the meetings, the Council heard summaries of activities and reports of accomplishments in Fiscal Year 2020 (FY-2020). It further discussed the federal agencies' responses to the 2019 Advisory Council Report. The Council provided the federal agencies the opportunity to report orally and to explain these responses to the 2019 Advisory Council Report. Included in this report as Attachment C are the federal written responses to the 2019 Advisory Council Report. At these meetings the Council also heard reports from the federal agencies on implementation of the Program during FY-2020 and discussed the substance of this report. The Council appreciates the efforts of the federal agencies to summarize Program accomplishments into a timely, informative, and concise Federal Accomplishments Report which was reviewed and discussed at the meetings.

COUNCIL COMMENTS AND RECOMMENDATIONS

GENERAL SUBJECTS

The Council continues to be pleased with the direction of the Program and the way the federal agencies are working together and coordinating with the Council, the Forum, the TAG, and the Work Group.

The importance of this joint effort is magnified as Reclamation and the Forum continue to evaluate alternatives to the Paradox Valley Unit (PVU), including options for restarting the existing brine injection well even if for a limited duration. The Council finds that continued salinity control at the PVU is a most critical issue. It is most important that all involved Department of the Interior agencies consider the Paradox replacement alternative effort as a department-wide effort and that BLM, USFWS and USGS continue as partners with Reclamation in moving the project ahead.

The Council is also pleased with BLM's continuing effort to study and understand salt mobilization processes on rangelands. Reclamation, USGS and Agricultural Research Service (ARS) have provided great assistance in this effort. This has been and continues to be very important. The Council encourages all federal agencies involved in these efforts to continue to work cooperatively to find answers to the salt loading which occurs from these federally administered lands. The Council is committed to work with BLM, Reclamation, USGS and ARS to pursue opportunities to fund these efforts. The Council also requests that the USGS continue to provide science support in this effort.

The Council also appreciates the efforts of the multi-agency Science Team in providing the TAG and the Work Group valuable analysis of various issues facing the Program and reviewing potential study efforts. The Council recommends that this support continue.

The Council and the Forum continue to develop opportunities to ensure that adequate up-front cost sharing is available to match the federal expenditures for the Program. The

Council appreciates Reclamation's extra efforts in working through the short-term management of the Lower Colorado River Basin Development Fund. The Council encourages all the federal agencies to work with the Forum on this effort as appropriate.

As a final general item, the timing of the renewal of the Charter has been problematic in past years as it has fallen coincident with the Council's fall meeting, which made it difficult to commit to meeting and travel arrangements when the Charter had not yet been signed by all three sponsoring agencies. The Council appreciates Reclamation's efforts this past year to move the period for renewal forward. It encourages the Department of Agriculture and EPA to likewise make early charter renewal a priority in 2022. Further, the Council recognizes that it is somewhat unique from other Federal Advisory Committee Act committees and so it requests that the Charter stay consistent with the Congressional mandate to the Council and that no additional provisions be added which would limit the Council's effectiveness in meeting its role in moving the Program forward.

PROGRAM FUNDING RECOMMENDATIONS

The funding level recommendations contained in this report are consistent with and support the conclusions regarding the funding required to accomplish the Plan of Implementation (Plan) adopted by the Forum as part of its 2020 Review. The Program includes a significant amount of non-federal cost sharing. The states provide, in total, 30 percent cost share for the Program from the Upper Colorado River Basin Fund and the Lower Colorado River Basin Development Fund. The states are currently the second largest contributor to the Program behind USDA. In addition to the states' cost share, the local producers cost share in the USDA on-farm program and many who participate in Reclamation's Basinwide Program bring significant dollars to their projects. The non-federal participants (states, landowners, irrigation districts, etc.) are ready in FY-2021 to contribute their share of the Program costs as up-front payments.

Tables 1 and 2 contain the Council's recommendations, adopted by the Council at its October meeting, for federal funding for FY-2021 through FY-2024. These funds are for the

construction activities necessary to meet the Program objectives as set forth in the Plan of Implementation found in the 2020 Review. The Forum also supports these recommendations and will seek adequate funding for the Program. The Council wishes to emphasize that funding delays and funding in lesser amounts will render the Program unable to meet the program objectives, as measured in tons of salt-load reduction. The funding recommendations shown in Table 1 are for the federal portion of project implementation costs only and are independent of the cost-share dollars from the Basin States Program. The Council also urges the agencies to provide adequate funding to support operation and maintenance, technical and education assistance, monitoring and evaluation of implemented projects and planning for future projects. The Council recommends that funds for these activities be provided in addition to the funds recommended in Tables 1 and 2. The Council requests that in their responses, federal agencies specifically comment on funding for these non-construction activities. Additional specific recommendations on Program funding are found in the individual agencies' sections below.

TABLE 1
Colorado River Salinity Control – Department of the Interior
Funding Recommendations (2021-2024)
December 31, 2020

	Fiscal Years			
	2021	2022	2023	2024
Bureau of Reclamation ^{1,2} Basinwide Program	\$10,700,000	\$10,700,000	\$10,700,000	\$10,700,000
Bureau of Land Management Salinity Specific Funding from the Aquatic Habitat Management Program	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000

Notes:

1. The Council anticipates and requests that Reclamation budget sufficient funds for required operation and maintenance of constructed units and for plan formulation in addition to these amounts.
2. Funding recommendations in Table 1 do not include funds recommended for studies and future implementation at the PVU. The Council needs the assistance of Reclamation to determine the level of funding needed to support the PVU.

TABLE 2
Colorado River Salinity Control – Department of Agriculture (EQIP)
Funding Recommendations (2021-2024)
December 31, 2020

STATE	FY-2021 ¹	FY-2022 ¹	FY-2023 ¹	FY-2024 ²
COLORADO				
FA	\$7,000,000	\$7,000,000	\$6,800,000	\$6,800,000
UTAH				
FA	\$5,190,000	\$5,133,000	\$4,807,500	\$4,807,500
WYOMING				
FA	\$250,000	\$250,000	\$250,000	\$250,000
TOTALS	\$12,440,000	\$12,383,000	\$11,857,500	\$11,857,500

Notes:

1. Based on State Conservationists' Three-Year Funding Plan (2021-2023)
2. Same as FY-2023. Advisory Council recommendation for guidance when developing 2022-2024 Three-Year Funding Plan

The below paragraphs provide specific comments and recommendations to the federal agencies involved in the implementation of the Salinity Control Program.

U.S. DEPARTMENT OF THE INTERIOR (DOI)

Bureau of Reclamation (Reclamation)

The Council greatly appreciates the efforts of the Upper Colorado Region (UC) office in the continued oversight and coordination of the Program and the priority given to the Program from the top down, including the assemblage and support of a capable and dedicated salinity team. The Council also appreciates the increased involvement of the Lower Colorado Region (LC) office, including participation of a salinity coordinator in the Work Group meetings and a high-level representative at the Forum and Advisory Council meetings.

The Council recognizes that it is difficult, given Reclamation's budget cycle, to make funding recommendations that can influence Reclamation's budget request for the next two fiscal years. The Council is very concerned with the 40% funding cut in FY2021. The Council recognizes the efforts of Reclamation staff to smoothly and efficiently implement the Basinwide Program despite yo-yoing appropriations. The Council also recognizes and commends Reclamation's efforts to acquire year-end and other funds to make up for initial appropriation shortfalls.

- The Council requests that Secretarial and Reclamation leadership do everything within their power to seek adequate and consistent funding levels. The Council recommends that Reclamation seek ways to maintain funding in FY-2022 and beyond in accordance with the amounts shown in Table 1. Reclamation is requested to give a detailed report on its efforts to secure additional funding at the next Advisory Council meeting.

Lastly, relative to funding, the Council recognizes Reclamation's efforts to continue to budget sufficient funds for required operation and maintenance of constructed units and for plan formulation, including the PVU alternatives studies and EIS effort. The Council also

recognizes that Reclamation receives an appropriation to its Colorado River Water Quality Improvement Program. While this program is outside of the Title II funding, there is meaningful overlap and benefits between the two efforts, including supporting staff and maintaining stream gaging and monitoring activities.

- Therefore, the Council requests that Reclamation support the funding of this line item so that it does not draw dollars away from implementation efforts under the Title II program.
- The Council requests that Reclamation continue to budget sufficient dollars, independent of the Basinwide Program funding, for O&M activities, planning, operations, and administration of the Program.

The Council appreciates Reclamation's efforts with the 2019 FOA and looks forward to the implementation of the projects selected thereunder. It has observed over the years Reclamation's efforts to adapt and be even more effective in administering the FOAs. It requests that Reclamation continue to do so. The Council appreciates Reclamation's efforts to work with applicants prior to submission of applications so as to create the best projects. The Council asks that Reclamation continue to adapt the FOA by listening to the needs and views of the applying entities. In particular, it notes the increasing opportunities to leverage different funding sources to create broader and more effective projects that benefit the larger community and watershed goals.

- With the 2019 FOA now completed, the Council requests that Reclamation, working with the Forum and its Work Group, assess the strengths and weaknesses of the recent process and create a list of items to be addressed prior to the next FOA.

The Council appreciates the effort in the UC Region to address and improve the contracting issues that have previously faced the Program. It also notes that it was surprised by changes in contracting direction from Denver prohibiting Reclamation from passing off contracts to the State Ag agencies. The Council appreciates Reclamation's efforts to modify its contracts with the state agencies to preserve the important functions of these agencies within the Program.

The past salt disposal at PVU has been very important to the Colorado River System for improving water quality and reducing economic damages in the Lower Basin. With the injection well presently turned off, the Council urges Reclamation to quickly evaluate the viability of continued operations and injection. The recently issued PVU EIS did not identify a viable salt disposal alternative. With this effort now complete, the Council urges Reclamation to work with the Forum in fully exploring any possibilities for salinity control at PVU.

The Council notes that Reclamation has brought together a capable staff to effectively administer the Program. The Council notes that important to the overall efforts in the past has been an engineering position. This position has now been vacant for several years. The Council reiterates its strong recommendation that this position be filled soon with a capable individual who works solely on the Program.

The Council appreciates Reclamation's significant efforts to update the Salinity Economic Impact Model (SEIM) for quantifying economic damages from salinity in the lower Colorado River System. The Council requests that Reclamation work with the Forum's Work Group to identify the next steps in improving our understanding and ability to quantify impacts of salinity levels.

Each fall Reclamation seeks input from the involved federal agencies and prepares a Federal Accomplishments Report (FAR), which report is sent to the Advisory Council before its fall meeting. The efforts of Reclamation to bring together the FAR each year in advance of the fall meetings is very helpful in the Council's review and evaluation of the Program, and the Council urges that this report continue to be provided.

The Council continues to observe the value of the role played by the Science Team. The Council urges Reclamation to continue to convene and staff the Science Team.

The Council asks Reclamation to respond in writing to recommendations contained in this report by **July 30, 2021**.

Bureau of Land Management (BLM)

The Council recognizes that when Congress directed the Secretary of the Interior “to develop a comprehensive program for minimizing salt contributions to the Colorado River from lands administered by the Bureau of Land Management,” BLM was given a daunting task. Creation of a “program” has not always fit within other BLM programs. As the Council has stated in recent reports, it recognizes and expresses appreciation for the top-to-bottom leadership which BLM is now showing relative to the Congressional charge to BLM. Such leadership is seen by participation in meetings, responses to inquiries, dedication of staff time and funding, commitment to studies, understanding and reporting, and the willingness to think outside the box in regard to integrating salinity control into other BLM programs and objectives.

The Council appreciates BLM’s efforts to implement salinity control practices dealing with administrative uncertainty. It also appreciates BLM’s ability to maintain the program despite the transition to the Aquatic Habitat Management Program. Moving forward, the Council recommends that BLM continue to expend at least \$2.0 million for implementation of specific salinity control activities on public lands within the Basin.

The Council also recognizes and appreciates BLM’s increased efforts to report expenditure of funds and project implementation to the Council and the Forum and to provide them with an opportunity to see proposed activities before they are implemented. The Council asks that BLM continue to do so and to work with other federal partners, the Forum, or its Work Group, to develop a method for reporting salinity improvements associated with such activities.

The Council appreciates BLM’s efforts to create a better understanding of salt mobilization on public lands, including being involved in a number of presently ongoing studies in conjunction with ARS and USGS. The Council understands that culmination of these efforts is nearing and is anxious to hear the results of these studies. The Council asks that BLM work with the Science Team and the Forum’s Work Group in reporting out the results of these studies as they become available. The Council requests and understands that BLM

will coordinate with the Work Group to know where studies have been reported (i.e., journals, etc.) and report the status of the overall BLM and ARS efforts, as well as plans moving forward.

The Council also recognizes and appreciates the significant efforts expended by BLM in developing a basin-wide APEX model. It requests that as the model is developed BLM work closely with the Science Team and the Work Group on reporting progress, coordinating efforts, and seeking peer review and input.

As in the past, the Council notes significantly increased efforts by BLM to quantify and report the salinity savings associated with various BLM activities. The Council applauds these efforts. It recognizes that this is no small task. The Council recommends that BLM continue to refine the process and then report such to the Science Team and Work Group for peer review and input.

The Council recognizes that reorganization and movement of staff has been long drawn out and difficult. The Council has for many years recommended that BLM's efforts include a salinity coordinator whose assignment would be to work exclusively on Colorado River salinity issues. The Council's vision is that the three implementing agencies, with their coordinators domiciled together, would move ahead as a team through daily interfacing of their coordinators.

The Council appreciates BLM's financial participation in the large USGS Upper Basin salinity trends study. As this study moves to the second phase and seeks to attribute identified trends to watershed processes, it requests that BLM provide the support, documentation and other assistance required by USGS to make the study as complete and robust in its analysis as possible.

The Council recognizes the desire to improve the options for the replacement of wildlife values foregone. It appreciates BLM's efforts to find and participate in the establishment of such replacement, especially on federally administered lands where long-term

maintenance and management can occur. The Council requests that BLM continue to be engaged with Reclamation, NRCS and the USFWS in seeking out and establishing such wildlife areas.

The Council requests a written report responding to each of the Council's recommendations by **July 30, 2021**.

U.S. Geological Survey (USGS)

The Council wants to express its continued appreciation for how responsive USGS is in its science role for the Secretary of the Interior in assisting with moving the Salinity Control Program forward. The Council appreciates the continued coordination and support of the Program provided by USGS with the several individuals involved in assisting with science support. Both the continuity of participation, as well as the ability to bring in specialists when needed, has really provided important strength and understanding to the Program. Participation by USGS on the Science Team, the TAG and Work Group and at Advisory Council and Forum meetings has helped strengthen the overall Program and efforts. Such participation provides input and guidance and helps merge science and implementation. The Council asks that USGS continue to participate in Program efforts and work with Reclamation, NRCS, BLM and the Work Group to ensure that the data collection, interpretation, and analysis efforts are accurate, effective and contribute to the overall goal of Program implementation.

The Council very much appreciates the significant efforts of USGS with a number of studies at the PVU. Such studies will be important to the overall understanding of the hydrodynamics of the brine discharge. The Council appreciates the recent efforts to complete these studies and asks that USGS stay engaged with Reclamation and the states as they seek to optimize brine collection and disposal activities.

The Council recognizes USGS's selection of the Upper Colorado River Basin as the second NGWOS basin. It sees great potential in increased and improved water monitoring and

modeling. There are a number of interests and objectives in the Upper Colorado River Basin. The Council recognizes USGS's efforts to be sensitive to the goals and objectives of the salinity control efforts and integrate these into the design of the increased monitoring instruments and locations and asks that such integration continue.

The Council recognizes USGS's initiation of the study of the long-term salinity trends in the Upper Basin and appreciates the support thus far. This is a big deal to the overall Program. The Council appreciates the extension of the effort to the Lower Basin to provide uniformity of analysis of trends in the system. The Council also appreciates USGS's efforts to regularly report progress and results to the Forum and the Work Group. It asks that as USGS moves to the second phase of the effort it continues to work closely with the states and BLM to complete as robust an analysis as possible.

The Council has given its support to detailed investigative efforts by USGS of the Pah Tempe Springs. The Council appreciates USGS's efforts and insight in proposing the final study to finish characterizing the fault zone which leads to brine discharge to the Virgin River. The Council recognizes that this effort has stalled a little with delays associated with finding a willing driller to complete the required testing and requests that USGS renew efforts to move the study forward and report to the Council on accomplishments.

The Council recognizes and appreciates USGS's recent efforts to review data gaps for potential new salinity project areas. The effort was well researched and presented and met the needs of the states. The Council also appreciates the addition of the Squaw Gulch in Colorado and CRIT lands in Arizona in the analysis. The Council requests that USGS continue to work with Reclamation and the Work Group as opportunities for new salinity control areas are further analyzed.

The Council recognizes USGS's critical role on the Science Team in identifying Program science needs and their role in scoping out potential studies and performing many of these studies. These efforts are much appreciated. USGS has performed a number of other

studies for the Program which have guided thinking and implementation activities. The USGS's role and efforts are recognized by the Council and are much appreciated.

The Council wishes to thank USGS for the priority it gives to funding the basic stream gaging program on the Colorado River. The Council encourages and supports USGS in their efforts to maintain the 20-gage network.

The Council requests that USGS respond to the Council on its continued ability to perform important data gathering, review and study functions by **July 30, 2021**.

U.S. Fish & Wildlife Service (USFWS)

The Council recognizes that many of its recommendations to the USFWS are on a continuing basis and do not change significantly from year to year. It appreciates USFWS's role in finding, reviewing, and supporting viable wildlife replacement projects and the service that USFWS provides in reviewing and tabulating replacement by areas and as requested. The Council recommends that USFWS continue these activities and proactively assist the other agencies in moving the program forward.

As noted in prior years, the Council again notes its appreciation for the tables provided by USFWS in the FAR. It also appreciates the efforts of the Service to review the M&E reports. The Council appreciates USFWS's efforts to review and approve off-site replacement efforts and concurs with USFWS that such efforts are better than receiving no replacement. The Council finds the review and tabulations of wildlife values foregone replacement efforts most helpful and requests that the Council continue to be informed each year in the FAR as to the effectiveness and current status of these efforts. It also asks that the FWS participate in a training presentation to the Work Group on how such wildlife values are determined and tabulated.

In the past few years USFWS has participated with other agencies in seeking and reviewing potentially larger, more permanent mitigation opportunities, including ones on federally administered lands. In the past the Council has recognized the USFWS's role in the

successful larger wildlife projects. The Council asks that USFWS continue to not only be a participant in these activities, but that it be proactive and a leader in looking for wildlife replacement opportunities which will provide lasting wildlife enhancement and which will fit within the Program opportunities and mandates, including construction of such projects on public lands.

The Council requests a written response to the above recommendations by **July 30, 2021**.

U.S. DEPARTMENT OF AGRICULTURE (USDA)

Natural Resources Conservation Service (NRCS)

The Council has recognized in the past and continues to recognize and express appreciation for the key and essential role that NRCS has played and continues to play in reducing the salt load of the Colorado River and its tributaries, creating local environmental benefits as well as benefits for downstream agricultural and M&I users. NRCS has been a consistent and very productive partner in the effort. Providing these benefits is the result of a coordinated effort between the Colorado, Utah, and Wyoming state NRCS offices in the Upper Basin and also the cooperation they have provided when working with other federal agencies, the TAG, the Forum, and the Work Group.

The Council appreciates the level of funding made available to the salinity control effort through EQIP despite the myriad of demands placed on program managers in allocating limited EQIP funds. Traditionally, on-farm salinity control has been some of the most cost-effective salinity efforts available. While much of the less expensive salinity control has now been accomplished and there has been a notable increase in on-farm salinity control costs in the last couple of years, cost-effective salinity control opportunities still exist. Continued funding is needed to meet the goals identified in the 2020 Review for the Department of Agriculture. The Council requests the three State Conservationists and their staff continue to develop a realistic Three-Year Funding Plan and that NRCS program managers continue to allocate salinity EQIP funds to the state offices consistent with such plan.

The Council also continues to recognize that much of NRCS's past success in implementing salinity control comes from efforts beyond simply servicing EQIP contracts. It comes from talented staff working with producers in properly operating and managing on-farm improvements. A USGS study of NRCS data over a number of years in the Grand Valley shows a wide range in effectiveness derived from implementation and maintenance of the same practices, confirming the importance of the continual need for training and assisting producers. It has come to the Council's attention that occasionally the limitation in

implementation of the Program is tied not to lack of available funding, but to lack of available staff to service needed contracts. The Council requests that NRCS evaluate Program limitations and, if needed, make adjustments so as to provide sufficient staffing to meet Program objectives. The Council requests that NRCS report back to the Council its review and findings.

The Council believes that it is the dedication, coupled with effective and hard work of NRCS personnel, which has made the NRCS salinity control program such a success. The Council appreciates the attentiveness of NRCS Washington staff in the Program's success. The Council also recognizes and appreciates the dedicated attention that the three State Conservationists have given the Program and it invites them to continue to frequently participate in Program meetings, discussions and activities and provide input, expertise and guidance as we move the overall Program forward. The Council simply requests that NRCS continues to remain an engaged and proactive partner as it has in the past.

The Council has urged in the past the employment of an NRCS salinity coordinator with authorities and resources to work anywhere, as needed within the seven Colorado River Basin States. NRCS has now hired two coordinators with complimentary but differing roles and with other assignments beyond salinity. The Council would simply urge that these coordinators are given sufficient time and resources to continue NRCS's participation in the overall Program efforts and that they be given the latitude and assignment to coordinate salinity control efforts throughout the seven states.

Last year the Council requested that NRCS provide data and an analysis of the varying cost effectiveness of EQIP contracts by practice in the various salinity project areas. The Council very much appreciates NRCS's report which showed that overall implementation of EQIP contracts continues to be a very cost-effective component of the salinity control program. The Council requests that NRCS continue to monitor and report cost effectiveness of EQIP in providing salinity control.

For some time the Council has looked forward to the opportunity afforded in the 2018 Farm Bill to provide EQIP contracts to Water Management Entities. The Council believes that such contracts will potentially fill a gap between Reclamation's off-farm program and regular EQIP on-farm contracts with producers. The Council appreciates NRCS now rolling out this part of the program and working with the Colorado River Basin States on its implementation. The Council requests that the State Conservationists and Washington staff continue to work with the states as this opportunity is implemented.

In similar manner, the Council expresses appreciation to NRCS for bringing to the states creative approaches to using other tools such as RCPP or PL566 to meet Program goals and objectives. It simply requests that NRCS continue in this collaborative vein as we seek to improve the water quality of the Colorado River System.

In the future, the Salinity Control Program may need to turn more and more to grazing lands (rangelands). BLM, ARS and USGS are now engaged in studies, in part funded by Basin States Program funds, to unravel the complex nature of salt loading from grazing lands. NRCS's Salinity Coordinator has been most helpful as this effort has moved ahead in the past. NRCS has leading knowledge in some aspects of this complex puzzle. The Council requests that NRCS continue to support this effort in any way it can.

The Council requests a written response from the USDA to recommendations contained in this report by **July 30, 2021**.

ENVIRONMENTAL PROTECTION AGENCY (EPA)

The Council continues to appreciate EPA's determination that Region 8 will be the coordinating region for the Salinity Control Program. The Council is pleased with the representative from this region and appreciates his participation at meetings, as well as the materials and responses provided, including EPA's annual write-up in the FAR.

The Council expresses appreciation to EPA for its involvement in, and assistance with the Forum's triennial review process to review and update its *Water Quality Standards for Salinity, Colorado River System (2020 Review)* including providing to the Forum a list of EPA administered NPDES permits. It asks that EPA now help shepherd the state standards through to approval. The Council requests that updates be given each year by EPA on the status of its efforts to approve such standards.

The Council also appreciates the involvement of EPA in water quality control efforts by the Tribes in the Colorado River Basin as they set water quality standards. The Council requests that EPA continue to provide updates on the number of tribes which have received Treatment as a State (TAS) designation and if they have adopted the Forum's policies into their NPDES rules. Anything else on implementation of water quality standards by the Tribes would be helpful.

The Council has found that Region 8 of the EPA has been most responsive to issues it has been asked to address. The Council would appreciate a response to the above comments by **July 30, 2021**.

INTERNATIONAL BOUNDARY AND WATER COMMISSION (IBWC)

While the Council's responsibilities are for activities occurring above Imperial Dam, the Council wishes to express its appreciation for the efforts and the activities of IBWC, particularly as it deals with sensitive salinity matters. The Council encourages IBWC to continue its coordination with the Council, the Forum and the states on issues affecting the salinity of the Colorado River as it crosses the international boundary. It also requests that from time to time, as appropriate, IBWC provide updates to the Council and the Forum on its binational salinity efforts and any other matters which may affect operations of the salinity control program.

The Council senses there may be a need to better inform Mexican officials and water users of the benefits to them associated with the Title II Salinity Control Program. The Council suggests that IBWC involve the Forum if there are ways that it can assist with any informational efforts directed to those using water below Imperial Dam. In the past the Forum and its staff has facilitated and conducted tours for designated officials from Mexico. It may be that IBWC would find this again to be helpful. If so, please contact the Forum in this regard.

CONCLUSION

The Council recognizes and appreciates its responsibility to submit comments and recommendations on salinity control activities to the federal agencies. As indicated in the General Comments section, the Council is pleased with the agencies' efforts put forth in 2020 and looks forward to providing a framework for future coordination and consultation. The Council requests that written responses to this report be provided by **July 30, 2021**. Responses should be sent to the Council's Chairman, Mr. Bill Hasencamp, at the following address:

Bill Hasencamp, Chairman
Colorado River Basin Salinity Control Advisory Council
P.O. Box 54153
Los Angeles, CA 90054-0153

It would be appreciated if copies of the responses are sent to Mr. Kib Jacobson, Reclamation's Program Manager for the Colorado River Basin Salinity Control Program (who also serves as the Designated Federal Officer to the Colorado River Basin Salinity Control Advisory Council), and to the Forum's Executive Director, Mr. Don Barnett, at the following addresses:

Kib Jacobson, Program Manager
Colorado River Basin Salinity Control Program
U.S. Bureau of Reclamation
125 S. State Street, Room 8100
Salt Lake City, UT 84138

Don A. Barnett, Executive Director
Colorado River Basin Salinity Control Forum
226 South 200 West
Farmington, UT 84025

Attachment A

Advisory Council Charter

August 28, 2020

Attachment B

ADVISORY COUNCIL MEMBERSHIP

December 31, 2020

ARIZONA

Clint Chandler
Phoenix, Arizona

Patrick Dent
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Erin Jordan
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WYOMING

Chad Espenscheid
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Cheyenne, Wyoming

Attachment C

Federal Responses to the 2019 Advisory Council Report