

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

**2023**

**COLORADO RIVER BASIN SALINITY CONTROL  
ADVISORY COUNCIL**

**December 31, 2023**

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- A – Colorado River Basin Salinity Control Advisory Council Charter, August 29, 2022
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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 August of 2022. 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, 2023, 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, 2023.

This 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. 27, September 2023*, and the *2023 Review, Water Quality Standards for Salinity, Colorado River System, October 2023 (2023 Review)* for a discussion of the Program. The first report is available at <https://www.usbr.gov/uc/progact/salinity/index.html> or by contacting Clarence Fullard, Program Manager for the Bureau of Reclamation's (Reclamation) portion of the Program. The second report is available at <https://www.coloradoriversalinity.org/documents.php?ctgy=Reviews> 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 2023. Meetings were held in Jackson, WY in June and in Santa Fe, NM in October. At the meetings, the Council heard summaries of activities and reports of accomplishments in Fiscal Year 2023 (FY-2023). At the June meeting the Council heard updates on implementation efforts. It also provided recommendations to Reclamation on the funding of studies. At the October meeting the Council heard reports from the agencies on salinity control accomplishments in 2023. 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. The Council did not issue a 2022 report. Included in this report as Attachment C are the federal written responses to the 2021 Advisory Council Report.

# 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 long-term alternatives to the Paradox Valley Unit (PVU), while operating the injection well at a reduced rate. 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, and USGS 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 also recognizes that a number of modeling tools have and are being developed and used by the various agencies to assist in understanding and forecasting salinity trends. The Council request that the Science Team coordinate these efforts so that the Council can

understand the strengths and weaknesses of the models and how best to use them for moving Program objectives forward.

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 just before or coincident with the Council's fall meeting, which makes 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 during the past several renewal periods to move the period for renewal forward. It encourages the Department of Agriculture and EPA to likewise make early charter renewal a priority in 2024 with the goal of having the charter signed by all three entities in July. 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 2023 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-2024 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-2024 through FY-2027. These funds are for the construction activities necessary to meet the Program objectives as set forth in the Plan of Implementation found in the 2023 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. They are also independent of the costs of administration, O&M on existing projects, planning, monitoring, training, etc. The Council 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 (2024-2027)**  
**December 31, 2023**

	Fiscal Years			
	2024	2025	2026	2027
Bureau of Reclamation <sup>1,2</sup> Basinwide Program	\$10,700,000	\$10,700,000	\$10,700,000	\$10,700,000
Bureau of Land Management Salinity Specific Funding from Aquatic Resources 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 (2024-2027)**  
**December 31, 2022**

STATE	FY-2024 <sup>1</sup>	FY-2025 <sup>1</sup>	FY-2026 <sup>1</sup>	FY-2027 <sup>2</sup>
<b>COLORADO</b>				
FA	\$5,450,000	\$5,800,000	\$6,000,000	\$6,000,000
<b>UTAH</b>				
FA	\$5,387,00	\$5,048,000	\$4,753,000	\$4,753,000
<b>WYOMING</b>				
FA	\$400,000	\$440,000	\$484,000	\$484,000
<b>TOTALS</b>	\$12,237,000	\$11,288,00	\$11,237,000	\$11,237,000

Notes:

1. Based on State Conservationists' Three-Year Funding Plan (2024-2026)
2. Same as FY-2026. Advisory Council recommendation for guidance when developing 2025-2027 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. It notes the reorganization of the UC office with its focus on the Colorado River which will help coordinate Reclamation's activities, including salinity control. 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 recent reductions in funding to the Basinwide Program. 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 again 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 restore funding in FY-2024 and beyond in accordance with the amounts shown in Table 1. Though the Council is very appreciative of Reclamation's efforts to "find" additional funds not initially appropriated to the Program, it would very much prefer an initial request of \$10.7 million in the President's Budget each year. Reclamation is requested to give a detailed report on its efforts to secure additional funding at the next Advisory Council meeting.

The Council appreciates Reclamation’s patience, insight and assistance in resolving the funding shortfalls in the Lower Colorado River Basin Development Fund. It specifically recognizes Reclamation’s willingness to be part of the solution through greater participation in the O&M expenses of older units.

- The Council asks that Reclamation remain fully engaged in the efforts as the solution works its way through Congressional authorization including providing supporting briefings and other information as may be requested by Congressional committees and staff.

The Council specifically expresses appreciation to Reclamation for its efforts to track expenditures under the Basinwide Program and Basin States Program and to keep Council and Forum members informed on funding status. The Council simply requests that Reclamation keep up the good work in this regard.

The Council also recognizes Reclamation’s efforts in the past year to work with the Forum’s Work Group and identify a method for better forecasting LCRBDF salinity revenues.

- The Council requests that Reclamation continue to implement the agreed-to methodology with updates every six months.
- It also requests that Reclamation consider even further potential fund forecasting improvements through dynamic inclusion of planned conservation projects even as or before they are finalized.

Lastly, relative to Program 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 has noted that in the past, while the project was not operating, O&M expenditures were on par with those during full operations. The Council has expressed concern over these high expenditures during periods of non-operation.

- Just to be clear, the Council welcomes the opportunity to cost share in and partner with Reclamation in Paradox operations – it just wants to do so when salinity control is being achieved.

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. The salinity efforts also benefit from Reclamation's development of the CE-QUAL-W2 modeling capabilities.

- 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 support and improve its short-term CE-QUAL-W2 modeling and provide semi-annual reports at the Forum meetings.
- Also the Council affirms its prior 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 prior FOAs (now NOFOs) and looks forward to the implementation of the projects selected under future NOFOs. The Council specifically recognizes and appreciates Reclamation's efforts to find a solution to the unprecedented pipe price increases which were experienced during COVID which allowed projects and salinity control implementation to continue forward.

- Once this effort is completed and all projects are moving ahead, the Council would appreciate a short report on the policies and methods employed, the costs, and the accomplishments which were achieved through providing one-time pipe price increase modifications to the Basinwide Program projects. Included should be a report on lessons learned and policies or positions developed for the future.

The Council has observed over the years Reclamation's efforts to adapt and be even more effective in administering the FOAs. The 2023 NOFO was no exception. That said, the Council was disappointed in the early reporting of applicant participation in the 2023

NOFO and it wonders if there are items which can be changed to the applications which would make the process more accessible and appealing to potential applicants. 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 NOFO 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.

- Between now and the next NOFO, the Council requests that Reclamation work with water users and the states to determine if there are changes which can be implemented to the NOFO process which would improve the applicant participation rate. The Council and Forum stand ready to participate in such an effort.

The past salt disposal at PVU has been very important to the Colorado River System for improving water quality (by 9-10 mg/L) and reducing economic damages (estimated at \$24 million annually) in the Lower Basin. The Council applauds Reclamation's efforts to continue injection, even if on a more limited basis, while alternatives are considered. The PVU EIS did not identify a viable salt disposal alternative. Nonetheless, given the value and singular importance of this project, the Council is not ready to give up on finding a workable alternative. The Council recognizes and appreciates Reclamation's efforts to issue an RFI and to continue to seek an acceptable alternative.

- Until a viable salt disposal alternative is successfully identified, the Council urges Reclamation to continue to apply focused efforts and resources identifying options and resolving any identified issues.

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 a staff engineering position. The Council appreciates Reclamation filling this position and requests that this engineer be given full latitude and resources to support the current program as well as explore opportunities for improving Program salinity control activities and seeking new opportunities for the future.

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 expresses appreciation for Reclamation’s and other agencies’ efforts in this regard and requests that this report continue to be provided each fall.

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 no later than **May 24, 2024**.

### ***Bureau of Land Management (BLM)***

As has been stated in prior reports, 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. The Council recognizes and expresses appreciation for the efforts which BLM is now showing relative to the Congressional charge by finding a way to make Colorado River salinity control fit within BLM’s other mandates and programs. Specifically, the Council recognizes the efforts of BLM’s salinity liaison, attached to headquarters with national resources, policy ties and program funding, and BLM’s experienced salinity coordinator attached to the NOC with technical resources and the

ability to coordinate with state and field offices. The combination is leading to strong support and resources for the program, and BLM's 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 has also witnessed BLM's recent efforts to train state and field offices, coordinate activities and include them in salinity meetings. All has enhanced understanding and consciousness of salinity control objectives. The Council's request is that BLM continue in this effective vein.

The Council appreciates BLM's ability to maintain the program funding and it 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, appreciates, and requests that BLM also continue to use other non-specific salinity dollars for efforts to study and improve the water quality in the Colorado River Basin. In particular, the Council notes BLM's efforts to leverage other dollars with salinity control projects to increase the number of projects which can be funded and their effectiveness.

The Council notes BLM's recent emphasis to use salinity funding for implementation of projects. It also recognizes and appreciates BLM's increased efforts and effectiveness in reporting 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. It specifically asks that BLM work with the Forum's Work Group to determine a defensible way to quantify and report both qualitatively and quantitatively the impact of such control efforts.

The Council appreciates BLM's efforts to create a better understanding of salt mobilization on public lands, including being involved in a number of studies. The Council asks that BLM work with the Science Team and the Forum's Work Group to report the results of

these studies as they become available. The Council reaffirms its request that BLM coordinate with the Work Group to know where studies have been reported (i.e., journals, etc.) and report the results of these efforts including the Texas A&M study to document and model salt transport on public lands.

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 has heard reports on the potential to be involved in projects to study methods and the potential effectiveness of watershed enhancements on water quality and water quantity. It is probable that should such study efforts be implemented, they would involve BLM administered land. The Council appreciates BLM's participation and leadership in these discussions and asks that BLM continue to provide leadership and technical support as options are explored.

The heart of Reclamation's salinity control program is aimed at reducing seepage, with its resulting salt leaching, from old earthen canals, ditches and laterals. Many of these ditches and canals are located on BLM administered lands and have grandfathered easements or rights-of-way. In implementing improvements under Reclamation's Basinwide Program, at times, greater efficiencies and cost savings can be achieved if there is a realignment of the new features outside of the old easements. The Program is exploring if requiring participants to vacate grandfathered easements for permitted ones is creating a hinderance to their participation in the Program. The Council appreciates BLM's insights and discussion in the matter thus far and simply asks that BLM continue to stay engaged as theses explorations continue.

The Council requests a written report responding to each of the Council's recommendations no later than **May 24, 2024**.

### ***U.S. Geological Survey (USGS)***

The Council wants to again express its 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. Hence, the Council simply asks that USGS keep up the good work and continue to participate in Program efforts and meetings 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 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. It has been noted that not all of the gages in this network receive USGS' A classification. The Council, therefore, asks that USGS work with the Forum and the Work Group to identify what needs to occur to make the 20-gage network as robust and serviceable as possible.

The Council has previously commented on and recognized 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 is anxious to receive a full report on the study findings and understand what such findings mean to the overall Program efforts now and into the future. Therefore, the Council requests that USGS include the Work Group in a



detailed review of preliminary study findings, and when appropriate, provide a detailed report to the Forum and Council.

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 recognizes and 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 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 appreciates USGS' efforts and now requests that USGS move forward in a timely manner with the data analysis and report writing.

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. Further, the Council recognizes and appreciates USGS' proactive efforts to bring to the Work Group's attention other study efforts of interest within the Basin.

The Council requests that USGS respond to the Council on its continued ability to perform important data gathering, review and study functions no later than **May 24, 2024**.

### ***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. The Council also recognizes the important role of the USFWS salinity coordinator.

As noted in prior years, the Council again expresses 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. The Council recognizes that the wildlife training opportunity has not yet occurred and so it requests that, when organized, the FWS participate in such training presentation to the Work Group on how 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 appreciated the Services report that it has been looking for mitigation banking options and opportunities. The Council asks that USFWS continue to not only be a participant in these activities, but that it be proactive and a leader in seeking out 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 **May 24, 2024**.

## **U.S. DEPARTMENT OF AGRICULTURE (USDA)**

### ***Natural Resources Conservation Service (NRCS)***

The Council recognizes and expresses 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 and in 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. 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 an 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 now in the 2023 Review for the Department of Agriculture. The Council requests the three State Conservationists, and their staff continue to develop a Three-Year Funding Plan and that NRCS program managers continue to allocate salinity EQIP funds to the state offices consistent with such plan. It also requests that NRCS look for opportunities to fund on-farm salinity control activities in the San Juan River Basin in New Mexico. As Reclamation completes the San Juan Dineh Project it is hoped that there will be on-farm opportunities.

During the past several years several factors have made it more difficult for producers to fully participate in on-farm salinity control activities as evidenced by reduced sign-ups and increased contract deferrals and cancellations. The Council asks that NRCS, working through their district and area offices, identify impediments to full Program implementation and report back to the Council. It is requested that the report include the identification of opportunities to overcome the identified impediments.

Key to NRCS' prior successes has been an engaged and capable salinity coordinator who has had full ability to work with NRCS offices throughout the Colorado River Basin. Several years ago, NRCS determined to move to a staffing model with two salinity coordinators but who also had other responsibilities. One of these has now retired. The Council urges NRCS to quickly fill that position with a capable and dedicated individual who is afforded at least fifty percent of his or her time to coordinating and implementing salinity control efforts and that that individual is afforded sufficient time and resources to effectively lead NRCS' multi-million-dollar salinity control efforts.

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 continue to evaluate Program limitations and, if needed, make adjustments so as to provide sufficient staffing to meet Program objectives.

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 notes NRCS' improved reporting of implementation of salinity contracts and requests that NRCS continue to provide such information to the Work Group. It also requests that NRCS continue to provide the annual M&E reports and that it review the information gathered from the project areas with the Work Group.

The Council expresses appreciation to NRCS for bringing to the states creative approaches to using other tools such as RCPP, PL566 and WME to meet Program goals and objectives. It requests that NRCS continue in this collaborative vein as we seek to improve the water quality of the Colorado River System. The Council asks that NRCS continue pursuing these types of opportunities and report frequently to the Forum and Work Group.

The Council requests a written response from the USDA to recommendations contained in this report by **May 24, 2024**.

## 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 (2023 Review)* including providing to the Forum a list of EPA administered NPDES permits. With this review now complete, it asks that EPA help shepherd the state standards through to approval and seek ways, if possible, to streamline the process. 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 appreciates EPA's effort to bring subjects of potential import to the states' and Council's attention. 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 **May 24, 2024**.

## **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 year the Forum has provided materials to the U.S. delegation on Title II salinity control activities and the Council encourages continued interaction. 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 2023 and looks forward to providing a framework for future coordination and consultation. The Council requests that written responses to this report be provided no later than **May 24, 2024**. 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. Clarence Fullard, 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:

Clarence Fullard, 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 29, 2022**

**U. S. Department of the Interior  
and  
U. S. Department of Agriculture  
and  
U. S. Environmental Protection Agency**

**Colorado River Basin Salinity Control  
Advisory Council**

**Charter**

1. **Committee's Official Designation.** The official designation of this Federal advisory committee is the Colorado River Basin Salinity Control Advisory Council (Council).
2. **Authority.** The Council was established by Section 204(a) of the Colorado River Basin Salinity Control Act (43 U.S.C. § 1594), Public Law 93-320, Title II, as amended by Public Laws 98-569, 104-20, 104-27, 106-459, and 110-246, and is regulated by the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C. Appendix 2.
3. **Objectives and Scope of Activities.** The Council provides advice and recommendations to the Secretaries of the Departments of the Interior (Interior) and Agriculture (Agriculture), and the Administrator of the Environmental Protection Agency (EPA) as stated in paragraph 4.
4. **Description of Duties.** The Council shall be advisory only and shall:
  - a. Act as liaison between both the Secretaries of the Interior and Agriculture and the Administrator of the EPA and the States in accomplishing the purposes of Title II;
  - b. Receive reports from the Secretary of the Interior on the progress of the salinity control program and review and comment on said reports;
  - c. Recommend to the Secretary of the Interior and the Administrator of the EPA appropriate studies of further projects, techniques, or methods for accomplishing the purposes of Title II; and
  - d. Provide to the Secretary of the Interior advice and consultation regarding implementation of the Basin States Program to carry out salinity control activities.

At the conclusion of each meeting or shortly thereafter, provide a detailed recommendation report, including meeting minutes, to the Designated Federal Officer (DFO).

5. **Agency or Official to Whom the Committee Reports.** The Council will report to the Secretaries of the Interior and Agriculture, and the Administrator of EPA through the DFO.
6. **Support.** Support for the Council will be provided by the Department of the Interior, Bureau of Reclamation.
7. **Estimated Annual Operating Cost and Staff Years.** The annual operating costs associated with supporting the Council's functions are estimated to be \$75,000, including all direct and indirect expenses and .20 Federal staff years support.
8. **Designated Federal Officer.** The DFO is the Colorado River Salinity Control Program Manager with Reclamation, and a full-time Federal employee appointed in accordance with Agency procedures. The DFO will approve or call all Council and subcommittee meetings, prepare and approve all meeting agendas, attend all Council and subcommittee meetings, adjourn any meeting when the DFO determines adjournment to be in the public interest, and chair meetings when directed to do so by the Secretary.
9. **Estimated Number and Frequency of Meetings.** The Council will meet approximately twice a year, and at such other times as designated by the DFO.
10. **Duration.** Continuing.
11. **Termination.** The Council is subject to biennial review and will be inactive 2 years from the date this Charter is filed, unless prior to that date, it is renewed in accordance with Section 14 of the FACA. The Council will not meet or take any action without a valid current charter.
12. **Membership and Designation.** Membership of the Council is specified in Title II as being comprised of no more than three representatives from each of the seven Basin States (Wyoming, Colorado, Utah, New Mexico, Arizona, Nevada, and California). The representatives will serve at the discretion of the Governors of the state that appointed them.

Non-Federal members of the Council serve without compensation. However, while away from their homes or regular places of business, non-Federal members and subcommittee members engaged in Council or subcommittee business approved by the DFO may be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service under 5 U.S.C. § 5703.

13. **Ethics Responsibilities of Members.** No Council or subcommittee member will participate in any Council or subcommittee deliberations or votes relating to a specific party matter before Interior or its bureaus and offices including a lease, license, permit, contract, grant, claim, agreement, or litigation in which the member or the entity the member represents has a direct financial interest.
14. **Subcommittees.** Subject to the DFO's approval, subcommittees can be formed for the purposes of compiling information or conducting research. However, subcommittees must

act only under the direction of the DFO and must report their recommendations to the full Council for consideration. Subcommittees must not provide advice or work products directly to the Agency. Subcommittees will meet as necessary to accomplish their assignments, subject to the approval of the DFO.

15. **Recordkeeping.** The records of the Council, and formally and informally established subcommittees of the Council, shall be handled in accordance with General Records Schedule 6.2, and other approved Agency records disposition schedule. These records shall be available for public inspection and copying, subject to the Freedom of Information Act, 5 U.S.C. 552.

**U. S. Department of the Interior  
and  
U. S. Department of Agriculture  
and  
U. S. Environmental Protection Agency  
  
Colorado River Basin Salinity Control  
Advisory Council**

**Charter**

Counterpart Signatory Page



Secretary of the Interior

MAY 26 2022

Date Signed

August 29, 2022

Date Filed

**U. S. Department of the Interior  
and  
U. S. Department of Agriculture  
and  
U. S. Environmental Protection Agency**

**Colorado River Basin Salinity Control  
Advisory Council**

**Charter**

Counterpart Signatory Page



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Secretary of Agriculture

August 29, 2022

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Date Signed

August 29, 2022

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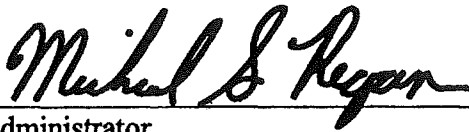
Date Filed

**U. S. Department of the Interior  
and  
U. S. Department of Agriculture  
and  
U. S. Environmental Protection Agency**

**Colorado River Basin Salinity Control  
Advisory Council**

**Charter**

**Counterpart Signatory Page**



\_\_\_\_\_  
Administrator  
Environmental Protection Agency

11 14 2022

\_\_\_\_\_  
Date Signed

August 29, 2022

\_\_\_\_\_  
Date Filed

## Attachment B

### ADVISORY COUNCIL MEMBERSHIP

December 31, 2021

#### ARIZONA

Clint Chandler  
Phoenix, Arizona

Patrick Dent  
Phoenix, Arizona

Erin Jordan  
Phoenix, Arizona

#### CALIFORNIA

Joaquin Esquivel  
Sacramento, California

Bill Hasencamp  
Los Angeles, California

Jessica Neuwerth  
Glendale, California

#### COLORADO

Rebecca Mitchell  
Denver, Colorado

David W. Robbins  
Denver, Colorado

Nicole Rowan  
Denver, Colorado

#### NEVADA

Andrew Burns  
Las Vegas, Nevada

Sara Price  
Las Vegas, Nevada

#### NEW MEXICO

Mike Hamman  
Santa Fe, New Mexico

Rolf Schmidt-Petersen  
Santa Fe, New Mexico

#### UTAH

Candice Hasenyager  
Salt Lake City, Utah

John Mackey  
Salt Lake City, Utah

Dan Larsen  
Vernal, Utah

#### WYOMING

Chad Espenscheid  
Big Piney, Wyoming

David Waterstreet  
Cheyenne, Wyoming

Jeff Cowley  
Cheyenne, Wyoming



# **Attachment C**

## **Federal Responses to the 2021 Advisory Council Report**



# United States Department of the Interior

BUREAU OF RECLAMATION  
125 South State Street, Room 8100  
Salt Lake City, UT 84138-1102



IN REPLY REFER TO:

UC-240

2.4.1.06

VIA ELECTRONIC MAIL ONLY

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

**Subject:** Reclamation's Responses to Specific Recommendations from the Colorado River Basin Salinity Control Advisory Council's 2021 Annual Report

Dear Chairman Hasencamp:

On behalf of Secretary Deb Haaland and Commissioner Camille Touton, I am responding to your email of September 24, 2022, regarding the 2021 Annual Report on the Colorado River Basin Salinity Control Program (Salinity Control Program), prepared by the Colorado River Basin Salinity Control Advisory Council (Council).

The Council contributes greatly to the success of the Salinity Control Program. We truly value your partnership, participation, and recommendations in the Salinity Control Program. The Salinity Control Program continues to make measurable progress in controlling the salinity problem. Our responses to the specific requests and recommendations in the report for Reclamation are enclosed.

We thank you for your support and for being such an active and supportive partner in the Salinity Control Program. If you have any questions, please contact Mr. Aung K. Hla by telephone at (801) 524-3753 or by email at [ahla@usbr.gov](mailto:ahla@usbr.gov). If you are deaf, hard of hearing or have a speech disability, please dial 7-1-1 to access telecommunications relay services.

Sincerely,

Wayne G. Pullan  
Regional Director

Enclosure

cc: See next page

cc: Bureau of Reclamation  
Designated Federal Officer  
Aung Hla, Program Manager  
Colorado River Basin Salinity Control Program  
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

# Reclamation's Responses to Specific Recommendations from the Colorado River Basin Salinity Control Advisory Council's 2021 Annual Report

## COUNCIL COMMENTS AND RECOMMENDATIONS, GENERAL SUBJECTS

1. 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 Technical Advisory Group (TAG), and the Work Group. The importance of this joint effort is magnified as Reclamation and the Forum continue to evaluate long-term alternatives to the Paradox Valley Unit (PVU), while operating the injection well at a reduced rate. 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.

Response: The joint leadership of Reclamation, BLM, Fish and Wildlife Service, USGS, and those within the Department of Interior responsible for the PVU are prepared to evaluate any potentially technical, environmental, and economical viable alternatives that would be feasible at Paradox Valley.

2. 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 also recognizes that several modeling tools have and are being developed and used by the various agencies to assist in understanding and forecasting salinity trends. The Council request that the Science Team coordinate these efforts so that the Council can understand the strengths and weaknesses of the models and how best to use them for moving Program objectives forward.

Response: Reclamation applauds the efforts of the Science Team for introducing transformational, practical innovations, and will continue to lead, and convene the Science Team.

3. 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 renewal period 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.

Response: This year, Reclamation prioritized and anticipated the barriers in the renewal process. Hence, the Charter was renewed in a timely fashion for 2023-24. Reclamation worked closely with a dedicated Federal Advisory Committee Act specialist in Reclamation and DOI to gain the respective approvals.

4. 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.

Response: Reclamation appreciates the Council’s confidence in the leadership of UC and LC regions, and the salinity team. Reclamation looks forward to continuing to work closely with the Work Group, Forum, and Advisory Council.

- 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 recent reductions in funding to the Basinwide Program. The Council recognizes the efforts of Reclamation staff to implement the Basinwide Program smoothly and efficiently 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.

Response: Reclamation works diligently to efficiently implement the Basinwide Program and will continue to look for year-end and other funding opportunities.

- The Council again 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 (shown below). Though the Council is very appreciative of Reclamation’s efforts to “find” additional funds not initially appropriated to the Program, it would very much prefer an initial request of \$10.7 million in the President’s Budget each year. Reclamation is requested to give a detailed report on its efforts to secure additional funding at the next Advisory Council meeting.

Response: Reclamation appreciates the support the Basin States provide to budget funding requests for the Salinity Control Program. Reclamation's UC Region takes every opportunity to make known the successes and the needs of the Salinity Control Program at all levels of Reclamation, within the Department and the Office of Management and Budget (OMB). Reclamation funds the Basinwide Program at the highest levels possible while balancing the need to not take the Lower Colorado River Basin Development Fund (LCRBDF) into higher accrual levels. Reclamation welcomes the opportunity to work with the Basin States to identify and prioritize the activities to be funded by appropriations received for the Salinity Control Program

TABLE 1  
Colorado River Salinity Control – Department of the Interior  
Funding Recommendations (2022-2025), December 31, 2021

	Fiscal Years			
	2022	2023	2024	2025
Bureau of Reclamation <sup>1,2</sup> 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 on Table 1:

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. Response: Reclamation funding was included in the President's Budget for FY2021 and FY2022. Reclamation feels that the units are being adequately funded to operate, maintain, monitor, and provide technical assistance.
7. 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 did note at its meeting that for the past several years, while the project was not in operations, O&M expenditures were on par with those during full operations. The Council expresses concern over these high expenditures during periods of non-operation.
- Just to be clear, the Council welcomes the opportunity to cost share in and partner with Reclamation in Paradox operations – it just wants to do so when salinity control is being achieved.

Response: Reclamation appreciates the Salinity Control Program's continued support for operation of the Paradox Valley Unit. Each fiscal year Reclamation strives for efficient and effective use of appropriated funding, consistent with Federal budget formulation processes, and with Reclamation's contractual obligations and commitments. Reclamation will continue to work with the Council and with Program partners to address increased uncertainty in annual planning and operations activities related to the PVU.

8. The Council also recognizes that Reclamation receives an appropriation to its Colorado River Water Quality Improvement Program (CRWQIP). 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 also Council affirms its prior 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.

Response: Reclamation recognizes the benefit of appropriations in the CRWQIP to fund non-contract costs and other support activities. The effort of the Colorado River Water Quality Program (CRWQP) is considered a vital component of the Salinity Control Program.

9. The Council appreciates Reclamation's efforts with the 2019 Funding Opportunity Announcement (FOA) and looks forward to the implementation of the projects selected thereunder. Many of the projects may be in jeopardy due to the recent, dramatic increases in pipe prices. The Council recognizes and appreciates Reclamation's efforts to review and find an appropriate resolution to this matter.

Response: Reclamation considered 3 options to solve the unprecedented problem of dramatic pipe costs. Reclamation chose to modify the existing agreements. This was the most cost-efficient and

optimized progress made to date which would allow for faster project completion. Recognizing that the increases in price due to the pandemic, natural disasters, and supply chain issues, it is in the Government's best interest to provide a one-time relief to cover the higher prices for pipes. To date, approximately \$8.67 million (Basin States \$3.37 million and Basinwide \$5.30 million) has been obligated in the FY22 modified agreements. Furthermore, \$3 million is projected to be obligated from the Basinwide Fund in FY23 and FY24.

10. The Council has observed over the years Reclamation's efforts to adapt and be even more effective in administering the FOAs. As we look forward to the 2023 Notice Of Funding Opportunity (NOFO), 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 NOFO 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 work with the Forum and its Work Group in assessing the strengths and weaknesses of the recent process and create a list of items to be addressed prior to the next NOFO.

Response: Reclamation regularly communicates with the Forum and the Work Group to identify and assess the strengths and weaknesses of the NOFO process. Reclamation will use the knowledge gained to further improve the NOFO process for 2023.

11. 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 reaffirms its appreciation for Reclamation's efforts to modify its contracts with the state agencies to preserve the important functions of these agencies within the Program.

Response: Reclamation appreciates the Council's recognition of its efforts to improve contracting issues.

12. The past salt disposal at PVU has been very important to the Colorado River System for improving water quality (9-10 mg/L) and reducing economic damages (estimated at \$24 million annually) in the Lower Basin. The Council applauds Reclamation's efforts to evaluate re-initiation of injection opportunities and requests that operations of PVU, even if on a more limited basis, continue to be top priority for Reclamation. Along this same vein, the Council urges Reclamation to hasten the Seismic Risk Analysis effort so that it is not an impediment to operational decisions. Lastly, 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.

Response: Reclamation will continue salinity control in the Paradox Valley by the existing injection well if it is viable to do so. A report, *Probabilistic Seismic Hazard Analysis for the Paradox Valley Unit, Colorado* (Technical Memorandum No. 86-68330-2022-04), was completed in September 2022. The results of this study will be integral to subsequent seismic risk analyses and will inform future operational decisions regarding the Paradox Valley Unit. Reclamation will work closely with the Forum and its Work Group as future operations and plans are formulated.

13. 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 a staff 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.

Response: Reclamation agrees with the Council that the Upper Colorado Region has capable staff housed within the Water Quality Group. Reclamation is working closely with its Human Resources staff to fill the Salinity modeling position as soon as possible.

14. 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.

Response: Reclamation is working closely with the Forum's Work Group on identifying practical steps to better understand the SEIM capabilities while modeling the economic impacts of salinity levels in the Colorado River System.

15. 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.

Response: Reclamation provided the 2022 FAR to Council members on October 4<sup>th</sup>, 2022, prior to the fall meeting.

16. 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.

Response: Reclamation finds the contributions from the Science Team valuable and timely. Reclamation will continue to convene the Science Team and seek innovative ways to further the goals of the Salinity Program.

The Council asks Reclamation to respond in writing to recommendations contained in this report no later than October 14, 2022.





United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
<https://www.blm.gov>



October 31, 2022

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

Dear Mr. Hasencamp:

Thank you for your recommendations to the Bureau of Land Management (BLM) in the Colorado River Basin (CRB) Salinity Control Advisory Council's 2021 Annual Report. As requested, this letter responds to each of the Council's recommendations regarding implementation of the Salinity Control Program.

#### **Program Funding Recommendations (pages 4-6)**

The Council recommends an annual funding level of \$2 million per year for fiscal years 2022-2025 for the BLM CRB Salinity Control Program. The BLM allocated the recommended level of funding in fiscal year 2022 and expects to continue this level of annual funding through fiscal year 2025, subject to Congressional appropriations and direction.

#### **Specific Comments and Recommendations to the BLM (pages 10-12)**

1. *“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, appreciates, and requests that BLM also continue to use other non-specific salinity dollars for efforts to study and improve the water quality in the Colorado River Basin.”*

The BLM expects to continue to expend at least \$2 million annually, subject to congressional appropriations and direction. The BLM Aquatic Resources Program will continue to explore opportunities to collaborate with other BLM programs including Abandoned Mine Lands, Energy and Minerals, Fire, and Rangeland Resources, as well as with our partners, to implement CRB salinity control projects and improve water quality in the Colorado River Basin.

2. *“The Council also recognizes and appreciates BLM's increased efforts and effectiveness in reporting 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. It specifically asks that BLM work*

*with the Forum's Work Group to determine a defensible way to quantify and report both qualitatively and quantitatively the impact of such control efforts."*

The BLM will continue to share information about expenditures and proposed salinity control projects with the Council and the Forum's Work Group and to coordinate with the Work Group to identify methods for quantifying and reporting the impact of the Bureau's efforts to control nonpoint sources of salinity and watershed restoration activities.

Additionally, in fiscal year 2023, the BLM plans to standardize procedures for using climate and remote sensing data and visualization tools to assess watershed restoration effectiveness and the impacts of authorized activities on the health and productivity of water resources on public lands.

3. *"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 specifically 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. 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 reaffirms its request that BLM 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 five-year cooperative agreement between the BLM and Texas A&M AgriLife Research expired in July 2022 and a one-year, no-cost extension was awarded to provide additional time for the grantee to finalize deliverables and publications. The BLM will share these products with the Forum's Work Group as they become available.

4. *The Council reaffirms its appreciation for BLM's financial participation in the large USGS Upper Basin salinity trends study. This study is now in the heart of the second phase which seeks to attribute identified salinity trends to watershed processes. At this juncture in the study, the Council requests that BLM provide needed support, documentation and other assistance required by USGS to make the study as complete and robust in its analysis as possible."*

The BLM recognizes the potential benefits of the U.S. Geological Survey's Upper Basin trends study and will continue to provide support and assistance for this study as appropriate.

5. *"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 BLM is committed to conserving and restoring habitat for wildlife and aquatic species on public lands to support the Bureau’s multiple use and sustained yield mission and will continue to engage with other Federal agencies to meet the requirements for habitat replacement.

Thank you for your interest in the BLM’s CRB Salinity Control Program. We look forward to continued coordination with the Advisory Council to improve water quality in the Colorado River Basin.

Sincerely,



Tracy Stone-Manning  
Director

cc:

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

Mr. Aung K. Hla  
Program Manager, Colorado River Basin Salinity Control Program  
U.S. Bureau of Reclamation  
125 S. State St., Room 8100  
Salt Lake City, UT 84138



United States Department of the Interior  
U.S. Geological Survey  
Office of the Director  
Reston, Virginia 20192

In Reply Refer To:  
Mail Stop 101  
WGS0000256

October 14, 2022

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

Dear Chairman Hasencamp:

Thank you for the opportunity to respond to the Advisory Council's comments and recommendations presented in the 2021 Annual Report on the Colorado River Basin Salinity Control Program (CRBSCP). We appreciate the Council's recognition of the responsiveness of U.S Geological Survey (USGS) science support to CRBSCP information needs. We look forward to continuing to work with the CRBSCP to provide data, interpretation, and analysis to facilitate the effective implementation of the Program.

We appreciate the Council's emphasis on timely results from USGS investigations. We continue to make progress toward completing and delivering results from multiple studies related to the modeling effort at the Paradox Valley Unit (PVU) in Colorado. The USGS Scientific Investigations Reports associated with both the conceptualization and numerical simulation of the PVU are currently in layout with USGS editors, have been shared with the CRBSCP and the Bureau of Reclamation (Reclamation) for review, and will shortly be made available to the public. The USGS has completed field-based investigations related to the fault zone near Pah Tempe Hot Springs to characterize the hydrogeologic factors associated with the spring complex. Current efforts have focused on investigations related to the hydrologic connection of an existing Reclamation well discovered onsite and the spring complex. The USGS and Reclamation will continue to work closely with the Washington County Water Conservancy District to complete the analysis of recent pump tests and deliver a draft of findings in a timely manner. The USGS initiated an assessment of long-term salinity trends in the Upper Colorado River Basin (UCRB) as part of a three-year study to investigate driving mechanisms for variation in salinity loading to the Colorado River through time. We will continue to update the CRBSCP as well as federal and state agencies as the results of water-quality trend attribution have preliminarily yielded insights into drivers for historical salinity trends observed in the UCRB. We have been pleased with CRBSCP interest as a stakeholder within the newly identified Colorado Headwaters Next Generation Water Observing System (NGWOS) Basin as well as the Upper Colorado Integrated Water Availability Assessment (IWAAs). We anticipate the NGWOS and IWAAs programs

will provide informative insight into many processes that relate to water quality and salinity loading in the Colorado Headwaters and the Colorado River Basin. Through recent reviews of data gaps associated with salinity control in the Upper and Lower Basins of the Colorado River, we have been able to produce tools to help program managers make informed decisions about new salinity control areas.

We encourage the Council to communicate to Mr. Tom Marston, Hydrologic Investigations Modeling Section Supervisor at the USGS Utah Water Science Center and current USGS representative to the Forum, whenever it wishes to be briefed on USGS activities in support of the CRBSCP. We will be glad to report out on progress and results, as appropriate, at any stage of the work.

The USGS will continue to be an active participant in the Salinity Control Program Science Team and recognizes the benefit of that participation in the development of collaborative and relevant research in support of CRBSCP activities. We recognize the importance of long-term data collection to the CRBSCP and 20-gage network in providing key data for the management of salinity in the UCRB.

Again, let me thank you for the opportunity to respond to and address the Council's comments and recommendations. If you would like any additional information or have questions, please contact Tom Marston (801-908-5030, [tmarston@usgs.gov](mailto:tmarston@usgs.gov)).

Sincerely,



David Applegate  
Director

Copy to:

Aung Hla, Designated Federal Officer  
Colorado River Basin Salinity Control Advisory Council  
125 S. State Street, Room 8100  
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Don A. Barnett, Executive Director  
Colorado River Basin Salinity Control Forum  
226 South 200 West  
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# United States Department of the Interior



IN REPLY REFER TO:  
FWS/R6

FISH AND WILDLIFE SERVICE  
Colorado Ecological Services Field Office Western Team

445 W. Gunnison Ave Suite 240  
Grand Junction, Colorado 81501-5711

ES/CO: BR/Salinity  
FWS Project Code: 2022-0089887

October 7, 2022

Bill Hasencamp, Chairman  
Colorado River Basin Salinity Control Advisory Council  
Metropolitan Water District of Southern California  
P.O. Box 54153  
Los Angeles, CA 90054-0153

Dear Chairman Hasencamp:

We have reviewed the 2021 Advisory Council Annual Report (Report) on the Colorado River Basin Salinity Control Program and offer the following response to comments addressed to the U.S. Fish and Wildlife Service (Service).

The Service participates in the Salinity Control Program by providing technical assistance on fish and wildlife habitat restoration, impact assessment, and species management, through implementation of Federal statutes including the Endangered Species Act (ESA), National Environmental Policy Act, the Migratory Bird Treaty Act (MBTA), and the Bald and Golden Eagle Protection Act. The Service provides independent review and oversight of program aspects dealing with fish and wildlife resources, including our assessment of the degree to which fish and wildlife have received due consideration in project planning and incidental fish and wildlife values foregone have been replaced.

We continue to consult with the Bureau of Reclamation (Reclamation) and the Natural Resource Conservation Service (NRCS) under Section 7 of the ESA regarding water depletions associated with canal lining, ditch piping, sprinkler systems, and habitat replacement projects; these affect the endangered fish in the Colorado River Basin and their critical habitats. Several other listed species occupy wetlands and riparian areas, such as the yellow-billed cuckoo (*Coccyzus americanus*), Southwestern willow flycatcher (*Empidonax traillii extimus*), and Ute ladies'-tresses orchid (*Spiranthes diluvialis*). Section 7 consultations are often necessary for salinity control projects that may affect these species as well.

In your report you acknowledge the role of the Service in finding, reviewing, and supporting viable wildlife habitat replacement projects, as well as reviewing and tabulating replacement acres within each salinity control unit. We will continue these activities and assist the other agencies in moving the Salinity Control Program forward. We will continue to work with Reclamation and NRCS to come up with habitat replacement plans that all parties agree will provide long term habitat replacement. Also in this year's Report, the Advisory Council requested that the Service participate in a training presentation to the Salinity Control Program

Work Group on how wildlife values are determined and tabulated. We are happy to assist in this regard and look forward to presenting along with Reclamation and/or NRCS to explain how wildlife values are calculated by each agency.

We continue to recognize that there is a need to consider “off-site” projects to be able to fully replace wildlife values foregone in several salinity control units. Because it has been challenging for NRCS and Reclamation to come up with replacement projects with willing landowners, the Service continues to remain flexible and will allow some off-site replacement to be credited to designated salinity control units if done according to mutually agreed upon protocol. As noted in your Report, the Advisory Council and the Service would rather have something on the ground and be proportional and concurrent, than to restrict wildlife replacement opportunities for only on-site replacement.

In early 2021 the Service assisted Reclamation with the development of the new In-Stream Habitat Quality Scoring Evaluation Criteria for use on stream restoration projects proposed as habitat replacement for salinity control projects. This effort adds increased flexibility and opportunity for habitat replacement projects to include in-channel habitat improvements with associated customized scoring criteria. These criteria do not replace the traditional scoring criteria, updated in 2018, but expand the options for habitat replacement to include stream habitat enhancements that can benefit not only riparian and wetland species, but also native aquatic species. These new stream criteria, now included along with the traditional Wildlife Habitat Evaluation Procedures for wetland and riparian habitats, add flexibility for a greater array of habitat replacement projects. These updated and expanded procedures facilitate habitat scoring for complex and innovative habitat enhancement/replacement projects such as that contemplated for Olsen Reservoir, within the Price-San Rafael salinity control unit, and the Price River downstream. The Salinity Control Coordinator is willing to continue to participate in the habitat replacement component of this complex, multi-year, multi-agency effort.

The Service will continue to provide the Salinity Control Forum and Advisory Council updates on the latest relevant developments with regards to the MBTA and the ESA. And we will continue to work with the Federal partners to address fish and wildlife values forgone and assist with meeting their mitigation goals. For any questions, please contact Kurt Broderdorp, our new Salinity Control Coordinator at [kurt\\_broderdorp@fws.gov](mailto:kurt_broderdorp@fws.gov) or Creed Clayton, Deputy Supervisor for the Colorado Field Office—Western Team (and past coordinator) at [creed\\_clayton@fws.gov](mailto:creed_clayton@fws.gov).

Sincerely,

for Ann Timberman  
Colorado Field Office—Western Team Supervisor

cc: Melynda Roberts, Program Coordinator, Colorado River Basin Salinity Control Program,  
[mroberts@usbr.gov](mailto:mroberts@usbr.gov)

Don A. Barnett, Executive Director, Colorado River Basin Salinity Control Forum,  
[dbarnett@barnettwater.com](mailto:dbarnett@barnettwater.com)

Mr. Bill Hasencamp  
Chairman  
Colorado River Basin Salinity Control Advisory Council  
Post Office Box 146201  
Salt Lake City, Utah 84114  
Code: 460

File

Dear Mr. Hasencamp:

Thank you for your letter and the enclosed 2021 Annual Report on the Colorado River Basin Salinity Control Program.

The Natural Resources Conservation Service appreciates the support and commitment of the Colorado River Basin Salinity Control Advisory Council to reduce salinity loading in the Colorado River Basin. Your long-standing support to improve the environment and economies of Colorado-River-water users is to be commended. The enclosure addresses each of your comments and recommendations as requested.

Again, thank you for writing and for your continued leadership and support of Colorado River Basin salinity control activities.

Sincerely,

Terry Cosby  
Chief

Enclosure

cc:

Don A. Barnett, Executive Director  
Colorado River Basin Salinity Control Forum  
106 West 500 South, Suite 101  
Bountiful, Utah 84010

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



## **U.S. DEPARTMENT OF AGRICULTURE (USDA)**

### ***Natural Resources Conservation Service (NRCS)***

#### **RECOMMENDATION**

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 an 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. It also requests that NRCS look for opportunities to fund on-farm salinity control activities in the San Juan River Basin in New Mexico.

#### **RESPONSE**

NRCS will continue to allocate funding and staff to state offices consistent with the State Conservationists' Three-Year funding plan in line with available resources and National, State and Local priorities.

## RECOMMENDATION

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 recognizes that there have been meaningful efforts this past year in filling vacancies within the Program and, therefore, simply requests that NRCS continue to evaluate Program limitations and, if needed, make adjustments so as to provide sufficient staffing to meet Program objectives.

## **RESPONSE**

NRCS will continue to provide funding and staff to implement cost-effective salinity control measures in line with available resources and National, State and Local priorities.

## RECOMMENDATION

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.

## **RESPONSE**

State Conservationists will continue to support the Program by attending and participating in meetings, discussions, and activities as necessary and ensure that NRCS staff continue to provide adequate support to the Program in line with National, State, and Local priorities according to available resources.

## **RECOMMENDATION**

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 reiterate its request 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. Particular efforts could be made in the states other than Utah to inform NRCS staff on Program goals and objectives and to report on implementation of such activities.

## **RESPONSE**

NRCS Salinity Control Program Coordinators are authorized to coordinate Salinity Program activities throughout the states and represent NRCS to cooperating agencies and States to implement the Program.

## **RECOMMENDATION**

Two years ago, 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 again review and report on the cost effectiveness of EQIP in providing salinity control. It also requests that NRCS continue to provide cost implementation data to Reclamation as it seeks to model such in the 2023 Review.

## **RESPONSE**

NRCS will continue to monitor and report cost effectiveness of EQIP salinity control measures to the Forum, Work Group, and Advisory Council.

## **RECOMMENDATION**

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 understands that NRCS has been working through issues in implementing WME contracts and asks that it look for an opportunity to report to the Council on successes and remaining obstacles.

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 requests that NRCS continue in this collaborative vein as we seek to improve the water quality of the Colorado River System.

## **RESPONSE**

NRCS State Conservationists and Washington staff will continue to work with the States to develop effective implementation strategies to implement Salinity Control measures through partnership with Water Management Entities as authorized in the 2018 Farm Bill.

- The Council further requests that opportunities beyond Utah be sought and reported on. It notes that NRCS is playing a pivotal role in considering and organizing a potentially large PL566 effort in the San Juan River Basin and it asks that NRCS continue pursuing this opportunity and report frequently to the Forum and Work Group.

## **RESPONSE**

NRCS will continue to seek to implement effective salinity control measures by leveraging available programs in a collaborative manner to meet Program goals and objectives. NRCS will continue to

support the States in their effort to develop the San Juan River Basin PL-566 project.

### RECOMMENDATION

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.

### **RESPONSE**

NRCS will continue to coordinate with BLM, ARS, and USGS to provide NRCS programs and technical expertise that facilitates salinity control on grazing land.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
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October 10, 2022

Ref: 8WP-CWP

**Sent Via Email**

Bill Hasencamp, Chairman  
Colorado River Basin Salinity Control Advisory Council  
[whasencamp@mwdh2o.com](mailto:whasencamp@mwdh2o.com)

Dear Chairman Hasencamp:

Thank you for your letter transmitting the 2021 Annual Report for the Colorado River Basin Salinity Control Program. Consistent with your recommendation, we will continue to support individual states and tribes, where applicable, as they develop and submit adopted water quality standards for approval.

We appreciate the recognition of the Environmental Protection Agency's (EPA) participation and support with the 2020 Water Quality Standards for Salinity, Colorado River Basin, triennial review process. EPA will continue its assistance as the Forum begins the 2023 triennial review process and will provide updates on the status of its efforts to review such standards for approval.

We also appreciate the recognition by the Council for our involvement with tribes in their water quality control efforts in the Colorado River Basin. EPA will continue to provide updates on the number of tribes which have received treatment similar in a manner to a state (TAS) designation and if they have adopted the Forum's policies into their National Pollutant Discharge Elimination System rules.

Finally, staff at EPA Region 8 will continue to represent EPA in the Colorado River salinity control coordination efforts. If you have any questions or concerns, please feel free to reach out to me at [bloom.judy@epa.gov](mailto:bloom.judy@epa.gov) or 303-312-6395.

Sincerely,

**JUDY** Digitally signed  
by JUDY BLOOM  
**BLOOM** Date: 2022.10.10  
15:37:18 -06'00'

Judy Bloom, Manager  
Clean Water Branch

cc: Michael Regan, Administrator  
KC Becker, Regional Administrator (Region 8)  
Martha Guzman, Regional Administrator (Region 9)  
Dr. Earthea Nance, Regional Administrator (Region 6)

Aung Hla  
Program Manager, Colorado River Basin Salinity Control Forum  
U.S. Bureau of Reclamation

Don A. Barnett  
Executive Director, Colorado River Basin Salinity Control Forum