

November 13, 2020

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County of San Diego

Bureau of Reclamation
Attention: Ms. KayLee Nelson, LC-6056
P.O. Box 61470
Boulder City, NV 89006-1470

Submitted via email to: 7DReview@usbr.gov

RE: Comments on the 7.D. Review Draft Report

Dear Ms. Nelson:

Thank you for the opportunity to comment on the Bureau of Reclamation's Draft Report on the Review of the Colorado River Interim Guidelines for Lower Basin Shortage and Coordinated Operations for Lake Powell and Lake Mead (7.D. Review Draft Report). The 7.D. Review Draft Report is written with the goal of providing a comprehensive description and evaluation of the effectiveness in accomplishing intended purposes of what are commonly known as the 2007 Interim Guidelines.¹ The 7.D. Review Draft Report presents a concise and informative history of work by the Bureau of Reclamation, Colorado River Basin States, Colorado River contractors, and other parties reliant on the Basin's limited water supplies to avoid wasteful litigation and conflict, and instead proceed through collaborative agreements based on shared goals.

The San Diego County Water Authority (Water Authority) joins the many Colorado River stakeholders in expressing our support for the improvements in operational efficiency, flexibility, and conservation incentives produced by the 2007 Interim Guidelines. The 7.D. Review Draft Report documents these beneficial impacts on the Colorado River system. Two graphs provide especially compelling evidence. Figure 4 (page 19) shows that operations under the Guidelines have successfully maintained Lake Mead elevations within the ranges of benefits predicted by modeling done to support environmental compliance for the 2007 Interim Guidelines. Figure 9, the graph on page 36, shows that the benefits to Lake Mead elevations from the Intentionally Created Surplus (ICS) mechanism have even exceeded projections: the graph shows a 35-foot increase in Lake Mead's elevation by 2019 over what would have occurred in the absence of the storage and conservation activities supported by the ICS mechanism.

In light of the success of the ICS mechanism documented in the 7.D. Review Draft Report, the Water Authority wants to take this opportunity to note its continued desire to

¹2007 Interim Guidelines is the commonly used abbreviation for the Colorado River Interim Guidelines for Lower Basin Shortage and Coordinated Operations that are referenced in the title of the 7.D. Review Draft Report.

participate in the ICS program which has been expressed since the program's establishment under the Guidelines in 2007. The Water Authority's participation in Lake Mead ICS storage would provide a variety of Colorado River Basin-wide, California-wide, and local benefits, including:

- Providing additional water within the Colorado River system to build elevation in Lake Mead and help keep Lake Mead levels above the shortage trigger elevations (the Draft Report explains these elevation-based shortage triggers at page 27 and shows how the ICS mechanism has avoided these trigger elevations at page 36);
- Aiding, at least potentially, California's implementation of the Lower Basin Drought Contingency Plan;²
- Developing carryover storage for use in dry years; and
- Creating flexibility in water management for local water managers.

The 7.D. Review Draft Report notes (on page 33) that limitations on parties "prevented broader participation in the ICS program and likely reduced the volume of ICS that could otherwise have been created between 2008 and 2019." On that subject, the Water Authority notes its unique eligibility to participate in ICS storage in Lake Mead. The Water Authority holds an entitlement to mainstream water under a water delivery contract with the United States which provides the necessary river contractor status. The Water Authority also has approved extraordinary conservation projects including 277,700 acre-feet of annual supplies under Exhibits N and O of the Lower Colorado River Basin ICS Forbearance Agreement as well as existing environmental compliance under the Lower Colorado River Multi-Species Conservation Program. While the Water Authority meets these required criteria, it currently lacks a designated storage account. The Water Authority asks that the Bureau of Reclamation consider the benefits of participation in the ICS program by the Water Authority and continue to work together to identify a path forward for the Water Authority's participation in current and future Lake Mead storage programs.

Thank you for your consideration of this letter. The Water Authority looks forward to working with the Bureau of Reclamation, other California contractors, the Colorado River Basin States, and all stakeholders to develop the next steps for the Basin under the next set of operating criteria. Please feel free to contact me, or Dan Denham, Deputy General Manager, at 858-522-6788 if you have any questions or require additional information regarding these comments.

Sincerely,



Sandra L. Kerl
General Manager

² The 7.D. Review Draft Report explains that "[t]he Lower Basin DCP was designed to a) require Arizona, California and Nevada to contribute additional water to Lake Mead storage at specified reservoir elevations, and b) create additional flexibility to incentivize additional voluntary conservation of water to be stored in Lake Mead." (page 7).