

Memorandum

To: Salton Sea Authority Board of Directors
From: G. Patrick O'Dowd, Executive Director/GM
Date: July 20, 2023
Re: **Colorado River Environmental Impacts**

Over the course of the past year, we have been tracking developments on the Colorado River which could significantly impact the Salton Sea and region. Since Commissioner Touton first announced potential cuts of up to 2 to 4 million acre feet last June, we have been seeking answers as to how those measures would impact the Imperial and Coachella valleys, and how it would affect the ongoing work related to the QSA transfers and otherwise. In November, 2022, the Bureau of Reclamation began work on a Supplemental Environmental Impact Statement, and late last year a "Commitments Agreement" was entered into by the Bureau, the State, IID and CVWD that contemplated among other things some 250,000 acre feet of conservation annually which might be created by the Imperial Irrigation District to support this effort. At that time the State prepared an analysis of the agreement that indicated a potential near term impact of 5,571 to 8,196 acres of additionally exposed playa, based on certain assumptions. However, when we compared that analysis with earlier work prepared by the State and its consultant team, we found these estimates standing in stark contrast to the impacts experienced from the QSA transfer. This is not to say that they are necessarily incorrect. But when the State assumes responsibility for assessing the impacts of curtailments 25% larger than that of the QSA that itself could potentially be paying for mitigation thereof, and at the same time avoiding more lengthy conventional risk assessments through waivers and indemnifications, this effort deserved rigorous scrutiny.

To that end, we have requested both our State and Federal partners work with us on a framework of assurance that would both address local concerns and facilitate an efficient implementation of the Commitments Agreement and the conservation measures contemplated thereby. We have presented several options and continue to seek alignment on this important effort, but to date that has not occurred. However, on June 15th the Department of the Interior announced that it was "initiating the formal process to develop future operating guidelines and strategies to protect the stability and sustainability of the Colorado River. The new guidelines will replace the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and the Coordinated Operations for Lake Powell and Lake Mead, which are set to expire at the end of 2026." This effort is separate from what is now being referred

to as the "Consensus System Conservation Proposal to Protect the Colorado River Basin", and does appear to be far more rigorous than that contemplated for the interim measures. However, since the Salton Sea was totally overlooked in the 2007 Interim Guidelines and subsequent actions, it will be critical to ensure that both the interim measures and the post-2026 actions fully assess and responsibly mitigate impacts to the Sea and our communities. The Salton Sea Authority will remain vigilant to ensure that happens.

Respectfully submitted,



G. Patrick O'Dowd
Executive Director/GM