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**COLORADO RIVER COMMISSION  
OF NEVADA**

August 16, 2022

VIA US Postal Mail & Electronic Mail

The Honorable Debra Haaland, Secretary of Interior  
Department of Interior  
1849 C Street, NW  
Washington, D.C. 20240

The Honorable Tanya Trujillo, Assistant Secretary of Water and Science  
Department of Interior  
1849 C Street, NW  
Washington, D.C. 20240

The Honorable Camille Calimlim Touton, Commissioner  
Department of Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Secretary Haaland, Assistant Secretary Trujillo, and Commissioner Touton,

The Colorado River Commission of Nevada (CRCNV) is the state agency responsible for protecting Nevada's annual 300,000 acre-feet allocation from the Colorado River. Our agency is gravely concerned over the crisis facing the sustainability of the river system. Southern Nevada relies on the Colorado River for ninety percent of its drinking water. Additionally, the Southern Nevada Water Authority (SNWA), and several industrial customers, rely on the CRCNV's hydroelectric power allocation from the river to support important industrial manufacturing and, most importantly, SNWA's ability to deliver Colorado River water from Lake Mead throughout the valley.

The inability of the parties to meet Commissioner Touton's demand for a collaborative concrete, definitive plan to further reduce consumptive water use is disappointing and alarming given the high stakes of a future system collapse. Nevada appreciates the list of action items identified by the office of the Secretary of the Interior in its August 15, 2022, press release but finds them lacking in necessary detail. Accordingly, the CRCNV supports SNWA's call for expedient and decisive action by the Secretary of the Interior to reduce Colorado River consumptive water use through measures outlined in SNWA's August 15, 2022, that include the following:

- Create new beneficial use criteria for Lower Basin water users, eliminating wasteful and antiquated water use practices and uses of water no longer appropriate for this Basin's limited resources

- Develop criteria for managing facilities, reservoirs, and projects for health and human safety operations in order to create certainty and predictability in the face of further reservoir declines
- Create a basin-wide municipal turf removal program to increase payments to customers where publicly available programs already exist
- Expand agricultural efficiency improvements that result in consumptive use reductions
- Eliminate wasteful municipal watering of non-functional turf and require seasonal irrigation schedules be implemented and enforced
- Invest in water reuse, water recycling, and desalination programs
- Purchase additional lands under the Lower Colorado River Multi-Species Conservation Program to prepare for habitat restoration under a significantly modified system
- Incentivize conversions to lower water-use crops
- Charge each contractor for evaporation and losses in the Lower Basin so that the Lower Basin can reduce its reliance upon excess water from the Upper Basin to balance reservoirs
- Reprioritize Salinity Control Act funding to only those projects that reduce consumptive uses of water, including following agreements and the purchase of marginal lands
- Accelerate and fund necessary improvements and modifications at Glen Canyon Dam that will increase predictability and reliability of releases under low reservoir conditions
- Prioritize federal funding for drought mitigation to those projects that provide meaningful long-term and permanent reductions in use

Further, while the CRCNV supports a collaborative approach to developing these action items, should such an effort fail to occur, the CRCNV stands ready with SNWA to pursue appropriate and necessary legislation to balance consumptive use with an existing water supply and the optimum ability to produce hydroelectric power.

The CRCNV commends the aggressive conservation actions implemented by the SNWA in the last several years, both in major infrastructure investment and consumptive use reductions affording southern Nevada important resiliency. It is our hope that the federal parties and other Basin States and water users will equally step up their efforts accordingly to provide the Basin with a secure, reliable water and power resource for the present and the future.

Sincerely,



Eric Witkoski  
Executive Director



Sara Price  
Senior Assistant Director