



March 29, 2024

The Honorable Camille Calimlim Touton
Commissioner
Bureau of Reclamation
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

VIA ELECTRONIC MAIL
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*Re: Conservation Groups' Cooperative Conservation Alternative for Post-2026
Colorado River Guidelines Operations and Strategies*

Dear Commissioner Touton,

On behalf of our respective organizations, we are grateful for the opportunity to contribute to the ongoing dialogue shaping the future of the Colorado River through the post-2026 NEPA process for developing Colorado River Guidelines and Strategies. The Cooperative Conservation Alternative (Cooperative Conservation) that we submit today emerges from a synthesis of lessons learned from operation under the 2007 Interim Guidelines, a deep understanding of the Basin's environmental dynamics, and a commitment to collaborative, equitable water management. It endeavors to introduce innovative strategies that balance the needs of human and natural systems under the shadow of climate change and increasing water scarcity.

Cooperative Conservation describes what we view as critical elements of forward-looking, comprehensive operations and strategies aimed at addressing the pressing and evolving challenges facing the Colorado River Basin, its ecosystems, and the diverse community of sovereigns and stakeholders reliant upon its resources. This Alternative is also designed to

inform and enhance one or more alternatives for consideration in developing the post-2026 Colorado River Environmental Impact Statement (EIS).

The significance of our Alternative lies not only in its aim to expand consideration of how to address immediate challenges, but also in its vision for a resilient and adaptive strategy that honors the interdependence of all who share this vital river. By embracing a holistic perspective that integrates scientific insight, stakeholder inclusivity, and environmental stewardship, we contribute to a framework that ensures the Colorado River remains a life-sustaining resource for future generations.

Our Alternative emphasizes the need for innovative strategies to stabilize system storage, integrate environmental stewardship and necessary mitigation measures, allow for binational solutions, and provide for flexible management tools that incentivize water conservation and maximize the community and ecological benefit of every drop of water saved. We introduce "Dual Indicator" operations for determining annual releases from Lakes Powell and Mead, aiming to avoid crisis management and stabilize storage. Additionally, we propose a stewardship targets and mitigation goals to maintain the integrity of priority Basin ecosystems, and introduce the "Conservation Reserve" as a flexible tool for water conservation and management.

We urge Reclamation to incorporate this Alternative into the NEPA process, evaluating its impact and feasibility alongside other alternatives. Furthermore, we advocate for an examination of the individual tools and strategies presented within our alternative, evaluating their potential to enhance the effectiveness and resilience of the proposed management strategies when possibly combined with components from other operational alternatives.

We are eager to engage in constructive dialogue with Reclamation, Basin States, Tribes, and stakeholders. This collaborative effort is essential for navigating the challenges ahead, united by our commitment to the Colorado River.

Sincerely,

Jennifer Pitt
Colorado River Program
Director
National Audubon Society

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Southwest Regional Director
American Rivers

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cc: David Palumbo, Deputy Commissioner, Bureau of Reclamation
Wayne Pullan, Regional Director, Upper Colorado River, Bureau of Reclamation
Jaci Gould, Regional Director, Lower Colorado River, Bureau of Reclamation
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