ANNUAL REPORT ON THE COLORADO RIVER BASIN SALINITY CONTROL PROGRAM

2011

COLORADO RIVER BASIN SALINITY CONTROL ADVISORY COUNCIL

December 31, 2011

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BACKGROUND

The Colorado River Basin Salinity Control Advisory Council (Council) was established pursuant to Section 204 of Public Law 93-320, the "Colorado River Basin Salinity Control Act of 1974" (Act). With the 2008 amendments to the Act that created the Basin States Program (BSP), the Advisory Council's consultation responsibilities have been redefined and clearly stated. The Secretaries of the Departments of the Interior and Agriculture and the Administrator of the U.S. Environmental Protection Agency (USEPA) 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 Colorado River Basin Salinity Control Program (Program) in 2008. A copy of the current Advisory 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 members. The Council membership list as of December 31, 2011 is included as Attachment B.

Many of the Advisory Council members are members of the Colorado River Basin Salinity Control Forum (Forum). The Forum is an organization 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 the Colorado River and Section 303 of the Clean Water Act.

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, 2011.

The report does not attempt to fully describe or analyze the Program. Readers unfamiliar with the Salinity Control Program should refer to *Quality of Water, Colorado River Basin, Progress Report No. 23, 2011* (USBR), and the *2011 Review, Water Quality Standards for Salinity, Colorado River System, October 2011* (2011 Review) for a full discussion of the Program. The first report is available at www.usbr.gov/uc/progact/salinity/pdfs/PR23final.pdf or by contacting Kib Jacobson, Program Manager for the Colorado River Basin Salinity Control Program from the Bureau of Reclamation (Reclamation). The second report is available at http://www.ColoradoRiverSalinity.org or by contacting Don A. Barnett, the Executive Director for the Forum. The addresses and phone numbers for Reclamation and the Forum are provided at the beginning of this report.

The Council met twice in 2011. The first meeting was held on May 25-26 in Glenwood Springs, CO. At that meeting the Advisory Council heard summaries and discussed the federal agencies' responses to the 2010 Advisory Council Report. Included in this report as Attachment C are the federal responses to the 2010 Advisory Council Report. The Council then heard a report from Reclamation concerning the potential needs and opportunities for the Paradox Valley Unit alternative studies, including the potential to reprogram year-end dollars for that purpose. The Council accepted the report and encouraged Reclamation to pursue all available opportunities for funding the studies. It also recommitted its support to take whatever steps were necessary to ensure timely completion of those studies. The Council also heard a report and recommendation from its Technical Advisory Group (TAG) on the use of cost sharing funds under the BSP. The Council reviewed and discussed the TAG's recommendations and then made recommendations to Reclamation on the use of BSP funds.

The second meeting was held on October 25-26 in Santa Fe, NM. At that meeting, the Council received annual summary reports from, and made inquiries of, the federal agencies. It also heard reports on the Lower Gunnison and Uinta Basin planning studies. Reclamation provided a continuation report on the opportunities for funding the Paradox Valley Unit, including the fact they were successful in reprogramming some end-of-year funds to this effort. Prior to the meeting, to facilitate discussion, Council members received written summaries from the federal agencies detailing accomplishments for the year. The Council recognizes the summaries are not explicitly required; however, the Council appreciates the agencies= preparation and transmittal of these summaries in advance of the Council meetings. They provide a valuable basis for more complete and focused discussions on the progress and needs of the Program. The Council recognizes these summaries describe the status of ongoing activities and, therefore, are not official agency reports as they contain, in some instances, incomplete data sets and preliminary statistics.

COUNCIL COMMENTS AND RECOMMENDATIONS

General Issues

The Council is pleased with the way all of the federal agencies are working together. The Council is also pleased with the agencies' efforts, in cooperation with the Forum's Work Group, to develop an Upper Colorado River Basin specific SPARROW model. The use of this model is integral to identifying cost-effective salinity projects outside the designated salinity areas, thus allowing the expenditure of salinity dollars when they are available and creating additional cost share opportunities. The Council recommends that the agencies continue to work with the Forum's Work Group to improve this tool and looks forward to future reports on how this tool is being utilized.

The Council is pleased with the leadership role Reclamation has taken in developing the Paradox Valley Unit alternative studies. The Council would remind the other Federal agencies, especially BLM and USFWS, that they too must have a significant role in these studies and would recommend that they work collaboratively with Reclamation and the Forum's Work Group to ensure timely completion of the studies. The Secretary of the Interior is charged with the responsibility of Colorado River salinity control and, as a part of the Department, all agencies of the Department should work on solving issues concerning the Program. Continuation of the Paradox Valley Unit is critical to the overall Program, removing over 100,000 tons of salt per year. Losing this unit for even a short period of time could have a severe impact on meeting the salinity standards and treaty salinity levels at the Northern International Boundary. Concurrent with these study efforts, Reclamation should continue to evaluate what options are available if the current well had a longterm emergency shutdown. The Council believes that the potential use of evaporation ponds should be fully analyzed and the demonstration project strongly considered. The Council is pleased that Reclamation has been able to program funds to get these efforts underway and encourages Reclamation to continue to work with the Council and continue to fully fund this effort until completed.

The Advisory Council has found that the economic damages model is most valuable. This model, created and maintained by Reclamation, has received valuable input and information from other agencies and is in need of frequent updating. Being advised that the lead economist from Reclamation's Denver staff, who has for years been responsible for this model, is anticipating retirement, the Council urges Reclamation and other supporting agencies to focus this year on any needed updates of this model. Reclamation has an effective Science Team which could be a helpful vehicle to assist in the review and update.

U.S. Department of Agriculture (USDA)

It was reported at the October Advisory Council meeting that there have been several changes in NRCS leadership at the state level. NRCS's salinity program is a key component to the overall Colorado River Basin Salinity Control Program. In the past it has provided very cost-effective salinity control. NRCS's EQIP has developed a great deal of momentum over the last several years. The Council encourages that this momentum be maintained under the new leadership, both at the state and national levels. To that end, the Council is pleased that NRCS continues to allocate EQIP funds to its salinity control efforts in the Basin. The Council continues to be supportive of NRCS's efforts to scale back its activities in the Grand Valley Salinity Control Project area and looks forward to hearing reports on how the wrap-up is progressing.

The Council is concerned that measures installed 20 years ago may not be as effective in some cases as when first installed. The Council believes that NRCS's effort to prepare annual monitoring and evaluation reports is most helpful. The issue of replacement of installed practices, however, has not been completely addressed by NRCS or the Council. The Council urges that NRCS, the Science Team and the Forum's Work Group collectively address this issue and provide to the Council in November a status report on this effort.

In the Management and Budget Recommendations portion of this report, the Council recommends that funding for the USDA portion of the federal program be in accordance with Table 1 of this report.

The Council requests a written response from the USDA to recommendations contained in this report by **April 30, 2012**. This response should include comment on statements made in this section of this report and also on recommendations found in this report under the General Issues and the Management and Budget Recommendations sections.

U.S. Department of the Interior (DOI)

Bureau of Reclamation (Reclamation)

The Council congratulates Reclamation for the efficient and effective way it expended funding made available under the American Recovery and Reinvestment Act to provide additional salinity control in the Basin. The Council has continually recommended that Reclamation fund its Basinwide Program at a higher level. The additional ARRA funding was a good example of how much additional salinity control could be achieved if additional funding were available. As indicated in the General Issues section, the Council appreciates the leadership Reclamation has provided in developing a Plan of Study for the alternatives study for the Paradox Valley Unit. This unit is critical to meeting the overall goals of the Program. As such, the Council stands ready to work with Reclamation to develop strategies for funding future salinity control in this area and would support any request for additional federal funding for studies. The Council recommends that Reclamation not only continue to pursue short-term funding to complete the studies, but also evaluate longer term funding opportunities for the implementation of alternatives that might be identified by the study. The Council encourages Reclamation to continue to work with the Forum's Work Group as it moves forward developing studies and analyzing future opportunities.

The Council is pleased that Reclamation is moving ahead with planning studies in the Lower Gunnison and Uinta Basin. The Council urges the completion of this effort at the earliest feasible date.

In the Management and Budget Recommendations portion of this report, the Council recognizes that it is very 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 does, however, recommend that Reclamation seek increased appropriations in FY 2014 and FY 2015 in accordance with Table 1 herein. Reclamation is requested to give a detailed report on its efforts to secure additional funding at the next Council meeting

The Council asks Reclamation to respond in writing to recommendations contained in this report by **April 30, 2012.** This response should include comment on statements made in this section of this report and also on recommendations found in this report under the General Issues and the Management and Budget Recommendations sections.

Bureau of Land Management (BLM)

The Act directs the Secretary of Interior "to develop a comprehensive program for minimizing salt contributions to the Colorado River from lands administered by the Bureau of Land Management." For a number of years, the Council had concerns that BLM was not effectively responding to its obligation to reduce the salt load from federally administered lands in the Basin. To improve this situation, the Council worked closely with BLM leadership to create a Salinity Coordinator position. The Council has enjoyed working with the Salinity Coordinator and believes BLM's program has been more focused since its creation. The Council is anxious that momentum not be lost and recommends that BLM move quickly to fill this recently vacated position. Because the Council believes this position is important to the overall Program, it urges that the position be attached to the headquarters office, giving the Coordinator the flexibility to move between the states. It further strongly urges that the Coordinator physically be located in Reclamation's offices in Salt Lake City, Utah where he or she can work closely with the salinity coordinators for Reclamation and NRCS. The Council also recommends that the Coordinator be given sufficient travel funds to allow the Coordinator to participate in required meetings. The Council places a high priority on this recommendation.

For a number of years, the Council recommended that BLM expend, in the Colorado River Basin, at least \$5.2 million annually under its Soil, Water and Air Program for activities which, among other priorities, will improve the water quality of the Colorado River. Since the creation of the Salinity Coordinator position, the states, working with Congress and BLM were able to provide for an additional \$800,000 to be used specifically for salinity control activities in the Colorado River Basin. In the recent past these dollars have been generally expended on studies, research and implementation. These studies and research have been successful in identifying several different tools which could be used to reduce the contributions to the salinity of the Colorado River from publicly administered lands. BLM's efforts are now transitioning towards implementation of salinity control and, noting that during the past several years proposals for implementation of salinity control specific efforts have exceeded more than \$1.5 million, the Council now recommends to BLM that at least \$1.5 million annually be made available for salinity specific activities in addition to the \$5.2 million expended under the Soil, Water and Air Program for general improvements within the Colorado River Basin.

The Council also recommends that sufficient funding from the Land Resources Subactivity be used for monitoring and maintenance of implemented projects.

As was discussed in the General Issues section above, the Paradox Valley Unit is an important part of the overall Program. Approximately 110,000 tons of salt annually, which would otherwise discharge to the Dolores River creating environmental and economic issues, is being disposed of through a deep injection well. There are concerns regarding the ability of the injection well to continue to operate into the future and the Secretary of the Interior, through Reclamation, is investigating economically viable and environmentally responsible salt disposal alternatives. Such investigation or ultimate solution may well temporarily or permanently involve lands which are presently administered by BLM. The Council strongly urges that BLM work closely and collaboratively with Reclamation in seeking expedited solutions to the continued operation of the Paradox Valley Unit.

The Council requests a written report responding to each of the above recommendations herein by **April 30, 2012**. This response should include comment on statements made in this section of this report and also on recommendations found in this report under the General Issues and the Management and Budget Recommendations sections.

U.S. Geological Survey (USGS)

The Council appreciates USGS's efforts in assessing and filling the science needs of the Program. In particular, it appreciates USGS's work on gaging activities within the Colorado River Basin as well as refinements to and running of the SPARROW model. It also recognizes USGS's efforts to study the hydrogeology of the Paradox Valley. The Paradox Valley is very complex from a hydrogeologic perspective and any information that can be provided will be of great importance in evaluating the alternatives developed by the Paradox Valley Unit alternatives study. In terms of data collection and review for the Program, the Council urges USGS to work with Reclamation and the Forum's Work Group to ensure that the data collected is accurate and to identify any difference or discrepancies in that data and to resolve those errors.

The Council finds that the contribution of the USGS in recent years with respect to the knowledge of water flows and salt tons added to the river system from Pah Tempe Springs has been most valuable. The USGS has been asked to propose additional studies so that these springs can be better understood. With the knowledge that nearly 100,000 tons of salt enter the Virgin River each year from these springs, the Council believes that these future proposed studies are most important.

The Council requests that USGS respond to the Council on its continued ability to perform important data gathering and review functions by **April 30, 2012.**

U.S. Fish & Wildlife Service (USFWS)

The Council recognizes and appreciates the Service's input and efforts relative to the replacement of wildlife values forgone. The Council also appreciates the Service's involvement in evaluating larger, more effective habitat replacement options which may involve federally administered lands.

As was discussed in the General Issues section above, the Paradox Valley Unit is an important part of the overall Program. Approximately 110,000 tons of salt annually, which would otherwise discharge to the Dolores River creating environmental and economic issues, is being disposed of through a deep injection well. There are concerns regarding the ability of the injection well to continue to operate into the future and the Secretary of the Interior, through Reclamation, is investigating economically viable and environmentally responsible salt disposal alternatives. Such investigation will likely involve a pilot evaporation pond study. Recognizing that the Service is part of the Secretary's team for finding disposal alternatives for the Paradox Valley salts, the Council urges the USFWS to work closely and collaboratively with Reclamation and the states to bring a science-based approach to the study and development of the disposal alternatives.

The Council requests a written response to the above recommendations by **April 30, 2012**.

MANAGEMENT AND BUDGET 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 2011 Review. The Program includes a significant amount of non-federal cost sharing. The states provide, in total, 30% cost share for the Program from the Upper Colorado River Basin Fund and Lower Colorado River Basin Development Fund. The states are currently the second largest contributor to the Program behind the USDA. In addition to the states= cost share, the local farmers cost share in the USDA on-farm program. The non-federal participants (the states, landowners, irrigation districts, etc.) are ready in FY 2012 to contribute their share of the Program costs as up-front payments. The Council continues to be pleased with the funding made available to the USDA as authorized by the FSRIA. The Council continues to be concerned that Reclamation funding is lagging behind the USDA funding in geographic areas where coordinated implementation is essential. The potential impact of such a lag is a slowed down, less cost-effective Program. The Council urges Reclamation to vigorously pursue adequate funding so as to allow timely implementation of its portion of the Program.

The Council is encouraged by BLM efforts in the Basin and recommends that, absent receiving the full funding contained in Table 1 for BLM, BLM make available to the Program at least \$1.5 million to fund on-the-ground salinity specific control measures. The Council and Forum stand ready to assist BLM in achieving this funding goal.

Table 1 contains the Council=s recommendations for federal funding for FY 2012 through FY 2015. These funds are for the construction activities necessary to meet the Program objectives as set forth in the Plan. The Forum will transmit these recommendations to the Congress and will actively seek the Congressional support necessary to maintain 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 Plan of Implementation objectives, as measured in tons of salt-load reduction.

As indicated in Table 1, the funding recommendations therein are for the federal portion of project implementation costs only. The Council also 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 funds for these activities be provided <u>in addition</u> to the funds recommended in Table 1. The Council requests that

in their responses federal agencies specifically comment on funding for these non-construction activities.

At its fall Advisory Council meetings, the Council members discussed in great detail how the funding recommendations should be made to the agencies. It was determined that the format of this section of the report should be revised to address the individual agencies based on their unique circumstances. The 2011 Review identifies a Plan of Implementation which would require a total of 1.85 million tons of salinity control by the year 2030. Through the year 2010, a total of 1.206 million tons of salinity control had occurred, leaving 644,000 tons of additional control to be accomplished in the next 20 years. Of this amount, it was projected that a total of 368,000 tons of control would be accomplished through Reclamation's Basinwide Program. This projection includes tons removed by the Basin States Program utilizing the cost share generated from Reclamation's Basinwide Program expenditures. An additional 10,000 tons of salinity control would occur through NRCS's EQIP. It was projected that an additional 10,000 tons of salinity control would occur pursuant to BLM efforts, leaving approximately 80,000 tons to be removed principally by the Colorado Conservation Board and the Utah Department of Ag and Food with Basin States Program cost share dollars generated from expenditures under the EQIP.

Recognizing the need for this amount of control, the Advisory Council makes the following funding recommendations:

U.S. Department of the Interior

Basinwide Program (Reclamation)

Reclamation has already received a FY 2012 appropriation of \$6,856,000 for the Basinwide Program. The Council recommends Reclamation not reduce this appropriation any further through budgetary manipulations and that, in fact, it attempt to increase this appropriation by reprogramming any Reclamation-wide excess FY 2012 appropriations into the Basinwide Program prior to the end of the fiscal year. The Basinwide Program has proven its ability to effectively and efficiently utilize such end-of-the-year funding. Reclamation has provided the Forum and Advisory Council with data which would indicate approximately 19,800 tons per year of new salinity control is needed if Reclamation is to meet its goal set out in the 2011 Review. Recognizing this fact, the Council recommends that as the budget process for FY 2013 progresses, Reclamation make every attempt to appropriate \$14,500,000 to the Basinwide Program and that as it begins budgeting for

FY 2014 and FY 2015, it budgets \$15,400,000 and \$16,300,000 respectively. The Council requests that Reclamation continue to budget sufficient funds for required operation and maintenance of constructed units and for plan formulation including the Paradox Valley Unit several studies.

Bureau of Land Management

For a number of years, the Advisory Council has struggled with its funding recommendations for BLM and the accounting of salinity control activities performed by this agency. For many years, BLM could not recite the amount of salinity control which was accomplished through its program. Funding activities such as salinity control come through BLM's Soil, Water and Air Program. This program is funded at about \$35 million nationwide annually. In the past, the Council has recommended that BLM spend about \$5.2 million annually from this account on projects within the Colorado River Basin which, among other benefits, will reduce the salt load to the Colorado River. Absent any new information, the Council continues to recommend this amount, but it requests that BLM better define how its recommendation be made. In addition, in more recent years, at the request of the Council, BLM, through a manager's discretion, has set aside approximately \$800,000 per year for specific salinity control activities within the Colorado River Basin. The expenditure of the funds in this manner has proven very beneficial to the Program by developing and testing methods of controlling salinity on public lands. The Council now recommends \$1.5 million for the next four fiscal years be set aside for specific salinity control on public lands within the Basin.

U.S. Department of Agriculture

EQIP (NRCS)

The Council appreciates levels of funding made available to the salinity control effort through the 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 a notable increase in on-farm salinity control costs in the last couple of years, cost-effective salinity opportunities still exist. Continued funding is needed to meet the goal identified in the 2011 Review for the Department of Agriculture. The Salinity Control Program is a small part of EQIP and, in the past, the Council has developed its funding recommendations independent of input from the Department of Agriculture based on the overall EQIP appropriation. The Council has now determined that it will make its recommendations for the allocation of EQIP funding for the salinity control effort based on the Three-Year Funding Plan developed by the State Conservationists for

Colorado, Utah and Wyoming. The funding allocations made by NRCS under EQIP generally do not come out until several months after the new fiscal year has begun and, therefore, input to NRCS is more immediate and projections out four years not nearly as germane. Further, the Three-Year Funding Plan put forth by the State Conservationists does not go out to 2015. However, to be consistent with other agencies the Council has simply preliminarily used the 2014 amount for 2015.

Based on the information provided in the Three-Year Funding Plan and in support of that Plan, the Council recommends the following fiscal year allocations for salinity control in the Basin: FY 2012 - \$18,416,300, FY 2013 - \$17,793,400 and FY 2014 - \$18,294,300, with \$18,294,300 as a preliminary amount for FY 2015.

Tables 1 and 2 summarize the Council's funding recommendations to the federal agencies. It should be noted that the funds identified in the tables do not include funds needed to continue to operate and maintain salinity control features and that where there is a responsibility to provide needed operation and maintenance funding, the agencies will include the required funding in their budgets.

TABLE 1 Colorado River Salinity Control – Department of the Interior Funding Recommendations (2012-2015) December 31, 2011

	Fiscal Years			
	2012	2013	2014	2015
Bureau of Reclamation ^{1,2}	n/a	\$14,500,000	\$15,400,000	\$16,300,000
Bureau of Land Management ³				
Soil, Water and Air (general)	\$5,200,000	\$5,200,000	\$5,200,000	\$5,200,000
Salinity Specific	\$1,500,000	\$1,500,000	\$1,500,000	\$1,500,000

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 Paradox Valley Unit. The Council needs the assistance of Reclamation to determine the level of funding needed to support the Paradox Valley Unit.

3. The Council anticipates and requests that BLM budget sufficient funds for inventory and ranking, planning, maintenance, monitoring, evaluation and support.

TABLE 2 Colorado River Salinity Control – Department of Agriculture (EQIP) Funding Recommendations (2012-2015) December 31, 2011

STATE	FY 2012 ¹	FY 2013 ¹	FY 2014 ¹	FY 2015 ²
COLORADO				
FA	\$6,770,000	\$6,195,000	\$6,195,000	\$6,195,000
ТА	\$2,031,000	\$1,858,000	\$1,858,500	\$1,858,500
State Total (FA & TA)	\$8,801,000	\$8,053,000	\$8,053,500	\$8,053,500
UTAH				
FA	\$7,000,000	\$7,000,000	\$7,000,000	\$7,000,000
ТА	\$2,240,000	\$2,240,000	\$2,240,000	\$2,240,000
State Total (FA & TA)	\$9,240,000	\$9,240,000	\$9,240,000	\$9,240,000
WYOMING				
FA	\$300,000	\$400,000	\$800,000	\$800,000
ТА	\$75,300	\$100,400	\$200,800	\$200,800
State Total (FA & TA)	\$375,300	\$500,400	\$1,000,800	\$1,000,800
GRAND TOTALS (FA & TA)	\$18,416,300	\$17,793,400	\$18,294,300	\$18,294,300

Notes:

1. Based on Final Three-Year Funding Plan (2012-2014)

2. Advisory Council recommendation for guidance when developing 2013-2015 Funding Plan

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 2011 and looks forward to providing a framework for future coordination and consultation. The Council requests that written responses to this year's report be provided by **April 30, 2012**. Responses should be sent to the Advisory Council Chairman, Dennis Strong, at the following address:

Dennis J. Strong, Chairman Colorado River Basin Salinity Control Advisory Council Utah Division of Water Resources 1594 West North Temple, Suite 310 Salt Lake City, UT 84116

It would be appreciated if copies of the responses are sent to Kib Jacobson, 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, Don Barnett, at the following addresses:

Kib Jacobson, Program Manager Colorado River Basin Salinity Control Program U.S. Bureau of Reclamation 125 S. State Street, Room 7311 Salt Lake City, UT 84138-1102

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

Advisory Council Charter

Attachment B

ADVISORY COUNCIL MEMBERSHIP December 31, 2011

<u>ARIZONA</u>

Perri Benemelis

Phoenix, Arizona

Larry R. Dozier

Phoenix, Arizona

Phoenix, Arizona

NEVADA

Leo M. Drozdoff Carson City, Nevada

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Dan S. Budd Big Piney, Wyoming

Patrick T. Tyrrell Cheyenne, Wyoming

John F. Wagner Cheyenne, Wyoming

Attachment C

Federal Responses to the 2010 Advisory Council Report