

MINUTES
of the
LEGAL COMMITTEE
Xylem Reservoir Center for Water Solutions
Washington, DC
March 14, 2024

Table of Contents

Welcome and Introductions	4
Approval of Minutes	4
Sunsetting Position.....	4
a. Universal Access to Clean Drinking Water Discussion	6
b. Dividing the Waters Program Discussion.....	7
Stream Restoration Webinar Series	9
Draft FY2024-2025 Committee Work Plan.....	10
Sunsetting Positions for Summer 2024 Meetings.....	13
Other Matters	13

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MEMBERS AND ALTERNATES PRESENT (**via zoom*)

ALASKA	Julie Pack Christina Carpenter
ARIZONA	Bruce Hallin
CALIFORNIA	<i>Joaquin Esquivel</i>
COLORADO	Becky Mitchell
IDAHO	Mat Weaver
KANSAS	Connie Owen <i>Earl Lewis</i> <i>Tom Stiles</i>
MONTANA	
NEBRASKA	Jesse Bradley Justin Lavene <i>Jim Macy</i>
NEVADA	Cathy Erskine <i>Jennifer Carr</i> <i>James Bolotin</i>
NEW MEXICO	
NORTH DAKOTA	Andrea Travnicek
OKLAHOMA	Julie Cunningham <i>Sara Gibson</i>
OREGON	<i>Doug Woodcock</i>
SOUTH DAKOTA	Nakaila Steen
TEXAS	Jon Niermann

UTAH

John Mackey
Teresa Wilhelmsen

WASHINGTON

Ria Berns

WYOMING

Jennifer Zygmunt
Chris Brown
Jeff Cowley

GUESTS

Kara Cafferty, State of Idaho
Yifan Luo, Cornell University
Joan Carlson, USDA Forest Service
Bob Joseph, U.S. Geological Survey
Victoria Asbury, Kansas Water Office
Steve Snyder, National Judicial College
Norm Semanko, Parsons Behle & Latimer
Jaclyn Buck, Texas Water Development Board
Katherine Rowden, U.S. Army Corps of Engineers
Hannah Singleton, Southern Nevada Water Authority
Jordan Beamer, Oregon Water Resources Department
Jim Rizk, Texas Commission on Environmental Quality
Trent Blomberg, Arizona Department of Water Resources
Jennifer Verleger, South Dakota Attorney General's Office
Kim Nugren, Texas Commission on Environmental Quality
Kathy Alexander, Texas Commission on Environmental Quality
John-Cody Stalsby, Texas Commission on Environmental Quality
Christopher Estes, Instream Flow Council / Chalk Board Enterprises, LLC

WESTFAST

Lauren Dempsey, U.S. Air Force
Chris Carlson, U.S. Forest Service
Mindi Dalton, U.S. Geological Survey
Chad Abel, U.S. Fish and Wildlife Service
Travis Yonts, U.S. Bureau of Reclamation
Stephen Bartell, U.S. Department of Justice
Michael Whitehead, Bureau of Indian Affairs
Paula Cutillo, U.S. Bureau of Land Management
Roger Gorke, U.S. Environmental Protection Agency
Heather Hofman, Natural Resources Conservation Service

Madeline Franklin, U.S. Bureau of Reclamation (WestFAST Liaison)

STAFF

Tony Willardson
Michelle Bushman
Elysse Campbell
Adel Abdallah
Ryan James

WELCOME

Chris Brown, Committee Chair, called the meeting to order.

APPROVAL OF MINUTES

Chris called for a motion to approve the minutes from the meetings held in Anchorage, Alaska on September 12, 2023. A motion was offered, seconded, and the minutes passed unanimously.

SUNSETTING POSITIONS

Chris reviewed the three sunseting positions for the Committee's consideration of renewal, with proposed changes.

Position #466, State Primacy over Groundwater. This position only has a few small grammatical changes. Chris noted that there's some concerns about the federal interest in groundwater, which seems to be growing. There's a note in the Legal Committee Work Plan about a recent filing in Georgia with regard to a potential federal reserve claim over groundwater. There's not a lot of time at looking at this resolution today, but as we get to the work plan, Chris suggested making sure that we're giving that some additional thought as it's a particular subject that seems to be evolving at the moment.

With there being no further comments, or questions, a motion to approve the revised position was made, seconded, and the Committee unanimously approved forwarding the position on to the Full Council.

Position #465 - supporting universal access to reliable, clean drinking water for federally recognized Indian Tribes and Alaska Native communities. This position was adopted three years ago for the very first time.

Becky Mitchell: Colorado suggested this position in 2021. There's just a few minor changes that need to be updated. One is acknowledgment of the positive impact from the Bipartisan Infrastructure Law (BIL) and other federal funds. Also, the original position was primarily focused on some of the disparities due to COVID, and the need for inter-governmental agreements. Colorado thinks that this is incredibly important, and we've already seen the benefits from it thus far.

Julie Pack: Alaska generally supports the intent of this resolution, that access to clean, reliable drinking water is fundamental to public health, well-being education and economic opportunity. We do not disagree on that basis. Our disagreement turns on the legal foundation in this resolution. Legally, this doesn't fit Alaska's unique tribal landscape. Instead of reservations, we have corporations with shareholders. This is considered an intentional change from the lower 48 reservation framework that is characteristic of the rest of the tribal communities that these addresses. Instead of treaties, we have the Alaska Native Claims Settlement Act, which was enacted in 1971. This piece of legislation codifies the settlement that was reached between the federal government, the state and tribes. This is all to say that the legal foundation that we're coming from is not just distinct, but it doesn't fit at all with the legal foundation that is reflected in this document to support the further engagement by the federal government with tribes in the lower 48. For those reasons, Alaska has a legally-distinct tribal grant landscape. It's those specific clauses that pertain to unresolved claims and the nature of the federal government's trust responsibility with tribes that the State of Alaska cannot legally support. For that reason, we request that Alaska specifically be excluded, which shouldn't affect the applicability of the resolution to tribes in the lower 48.

Chris recommended some additional amendments. The Whereas clauses that talk about funding to develop drinking water infrastructure in those communities - if we are striking the reference to the Alaska Native communities, I think that is a little bit ambiguous. I would suggest in place of that phrase, we say, "infrastructure for federally recognized Indian tribes." Does anyone have an objection to that? (No objections were raised). Then the change Colorado's suggesting in the second-to last Be It Further Resolved clause, I would suggest that where it currently says "and encourages entry into intergovernmental agreements to facilitate such coordination," I would suggest saying that we just say, "encourages intergovernmental agreements." Is there any objection to that proposed change?

Chris: I'm wondering, Ann or Becky, what are these agreements that you're thinking about with this new clause?

Ann: One example is an agreement between the IHS and the USBR. The IHS has a ton of infrastructure construction funding, but as I mentioned, very often tribes don't have shovel-ready projects that can take advantage of infrastructure funding. Under the IRA, USBR got money for planning, design and construction of domestic drinking water systems in disadvantaged communities. They can coordinate with each other and provide a full solution that can be formalized in an intergovernmental agreement. That's just one example. It's emblematic of some of the different funding streams and different authorities that agencies have that could be leveraged.

The next position for consideration is Position #467, supporting the Dividing the Waters Program for Judges and here to talk about that is Steve Snyder, Executive Director of the Dividing the Waters.

Chris: Michelle has put up the DTW position on the screen. As you can see there are some edits, mainly to just bring this resolution up to date since the last time it was passed. Unless there is any questions, or additions I would entertain a motion to move this on to the Full Council. With there being no further comments, or questions, a motion to approve the revised position was seconded and the committee unanimously approved forwarding the position on to the Full Council.

UNIVERSAL ACCESS TO CLEAN DRINKING WATER

Anne Castle, Senior Fellow Getches-Wilkinson Center, University of Colorado Law School, and Federal Chair of the Upper Colorado River Commission, provided an update on efforts to ensure access to clean water for tribes. The disparity that we're trying to call attention to here is that 48% of tribal homes don't have access to reliable water sources, clean drinking water, or basic sanitation. It is difficult to get precise estimates of the extent of this problem and it's difficult to segregate just clean drinking water, but this is the best estimate we have. It is absolutely clear that tribal homes are disproportionately more likely to lack access to clean drinking water than other communities. A map from the Indian Health Service (IHS) shows where the need is greatest for clean water supplies, drinking water supplies. It's in the Dakotas, Oklahoma, the Four Corners region of the Southwest, California, and Pacific Northwest. It's primarily a western phenomenon. The extent of the problem is largest in Alaska, with the IHS estimating that about half of the need occurs in Alaska Native villages. As Becky Mitchell mentioned, this is a public health issue. The resolution that was adopted three years ago by the Council focused on the disproportionate incidence of COVID, which was correlated to lack of indoor plumbing and native communities. This continues to be the case, but it is a broader public health issue. There's data on Alaska in particular, with respect to higher incidence of respiratory infections, skin disease, pneumonia, and correlated to lack of indoor plumbing. This all relates back to the federal trust responsibility to tribes. Tribes were promised permanent livable homelands when the reservations were created. Not having access to clean drinking water isn't consistent with that promise.

I do want to recognize that there has been very significant funding for infrastructure as a result of the BIL. The IHS in particular got \$3.5 billion for their sanitation deficiency system, which includes clean drinking water. EPA got plus-ups as you all know, in the State Revolving Funds (SRFs), and those SRFs have a percentage designated as a tribal set aside, so that goes directly to tribes or to the IHS for tribes. The USBR got a big chunk of money for reserved water rights settlements and rural water supply projects.

We don't yet have a complete solution to the problem of access. This funding focused on infrastructure, but we have to get projects to the stage where they can take advantage of infrastructure funding. Funding is also needed for technical assistance. There are real issues with operation and maintenance in Indian country and community facilities have been left out of connection and funding to clean drinking water. This WSWC resolution recognizes the problem.

It's consistent with the very important Council resolution that supports negotiated Indian water rights settlements. It affirms the federal trust responsibility to ensure the survival and welfare of tribes and I wanted to be clear that it deals only with drinking water, not with water supplies in general. The Council's support for access to clean drinking water for tribes is really, really significant.

DIVIDING THE WATERS PROGRAM

Steve Snyder, Executive Director for the Dividing the Waters (DTW) Program under the National Judicial College talked about the history of the DTW Program and its anticipated trajectory in the near future. DTW was founded in 1993, with the support of the Ford Foundation. For more than 20 years, various foundations funded the program with Hewlett and Bechtel leading the way. In 2007, the DTW Program became an affiliate of the National Judicial College, which allowed the Program to offer the latest expertise, methods and technologies for state and federal judges assigned to water litigation, to build their understanding of the complex issues in front of them. From our perspective, water law is not very useful. You can't really understand it without understanding hydrology, environmental science, other water sciences, water resource management, and the complex history. We try to incorporate all of that in our programming and give the judges some context for the water decisions that are going to be making. Examples of programs we've done over the years include fundamentals of water law for judges that have not seen a water case ever, water workshops for fundamentals of groundwater modeling, the impact of climate change, disputes over consumption, management of surfacing, and groundwater.

The program itself is run by six judges from six western states: (1) Supreme Court Justice from Colorado; (2) District Judge from Nevada; (3) Supreme Court Justice from the State of Washington; (4) John Thorson, who is the co-founder of DTW and who was the special master for a number of years on the general stream adjudication in Arizona; (5) Supreme Court Chief Justice with New Mexico; and (6) Eric Wildman, a District Judge in Idaho who's been presiding over the Snake River Basin Adjudication, which has probably been the most successful general stream adjudication in the country.

We have started two education projects. The first is an online, on-demand 24-hour course on Water Law, and Associated Disciplines. As envisioned, it would be a 15-unit course, which may or may not change as we move forward. It would be a very high quality, high production value course. Our consultant is the former (retired) Academic Vice President for Online Education at the University of Arkansas. Topics would include: interstate water litigation, fundamentals of water law, and a lot of water science. Producing high quality, online programming is not cheap. We have been able to raise enough money to put together the first unit of this 15-unit program. It's on hydrology and it's almost done. The main presenter is Thomas Harter, a professor of water science and hydrology at the University of California, Davis. I've seen some excerpts of the program as it's been put together and from my point of view is fantastic. When it's ready to go, we'll be happy to show it to you, I think you will be impressed. We're going to use this as a demonstration for what online education can look like and then proceed to seek foundation and other financial support for the programming as we envision it now. It would not generally be

available for non-judges, except for certain segments, which would be designed to allow judges to have candid conversations with themselves about difficult situations they encounter in dealing with these cases. It will be hosted online by the National Judicial College. So that's been a major effort. If any of you folks are interested, or want to learn more about this, we can certainly arrange a time when I could tell you about it.

The other major effort is what we're calling the Western Judicial Consortium on Water Law. The National Judicial College has issued an invitation to the western states to participate in this consortium. At the end of our Santa Fe conference on the Colorado River, several Chief Justices of the western states got together to discuss their states' needs to train judges on water litigation. The result was a proposal to create this Western Judicial Consortium on Water Law. The states that participate would make a financial contribution that would be used to help develop the online program, and to help support DTW programming for judges. I don't believe the DTW will be fully supported by this consortium. The consortium has been structured so that the states needs for specific training on their the issues is not ignored and so some of the money the states put in would go to state-specific programming. Some will represent a source of funds to DTW. So far, the states that have agreed to be members are: California, Colorado, New Mexico, Utah, and Washington. We're in discussions with the judiciaries in a couple of other western states. I provided a couple of handouts on this Western Judicial Consortium on Water Law, although they're still in a tentative draft. If you have them, and skim through both of those, you will see the direction were going with this consortium. One thing I should make clear is that the DTW is not technically a member of this consortium, the states are members who would be providing a lot of the water education for the consortium.

We have a conference coming up in May in Salt Lake City on the Great Salt Lake and Utah's efforts to deal with the ecological problems, which are basically that same problem throughout the West, that things are over-appropriated. Now with climate change and drought, and the Great Salt Lake shrinking, and with all the ecological disasters, you can imagine what that amounts to. We've put on a lot of webinars, which are actually listed on the handout entitled Information Resources Available to Member States. All the information listed on both sides of this paper are DTW generated. As a quick run through, we've had a webinar on: Dam Removal on the Klamath River; a four-part series on Surface-Groundwater Conflicts in the San Luis Basin; Design, Development and Implementation of a Colorado Rio Grande Decision; and just recently we had a webinar on the Supreme Court's *Sackett* Decision. And I just came out of a webinar on the Supreme Court's *Arizona v. Navajo Nation*.

Questions:

Chris: Thanks very much. I remember using the Hydrologic Modeling Bench Book that the DTW put out some years ago, which has probably been updated, but some of these resources that you're talking about, are they available to folks other than your attendees at your programs?

Steve: Yes. They're on our website. You don't have to have a code or anything to access it.

Chris: Thank you. I'll put it in a plug for that now because I was trying to figure it out, in a particular case I was working on, how to describe the modeling to a judge, which I first had to figure out for myself. The material was equally helpful to attempt to at least educate myself and then it was presented in such a way that it was geared towards educating a judge, which is what I'm supposed to do, apparently. I also thought it was pretty interesting when you were talking about having the 24-hour hotline for judges! I was thinking, what kind of a response would I get if I asked the judge to phone a friend right in the middle of something? Not sure what he or she would say, but that's very interesting.

Teresa Wilhelmsen: I will actually be one of the presenters in the May conference dealing with the Great Salt Lake and public trust issues and so I'm looking forward to that. I think it's going to be very helpful for some of the judges in Utah.

Steve: The Department of Natural Resources is taking us on a ground tour of the Great Salt Lake. We're all looking forward to it.

STREAM RESTORATION WEBINAR SERIES

Madeline Franklin, WestFAST Liaison, provided an update on the webinar series on stream restoration and water rights.

There is a handout under Tab Q in the books. I've talked about this at the last couple of our meetings and so I just want to give an update. The Western States Federal Agency Support Team (WestFAST) has been working in partnership with WSWC and CK Blueshift (Caroline Nash) to put together a webinar series on stream restoration and water rights just to help drum up ideas, share information, share activities on that dynamic between restoration projects, permitting, and state water rights. So far, we've had some intro webinars just on the science and setting up the topic. We've also heard from four different states about what's going on in their respective regions, what the activities, what the projects look like, what some of their constraints are, what their challenges are, as well as some of the new legislation in their states. We've heard from the States of Colorado, Utah, California, and Nebraska. Our next couple of webinars will focus on landowner perspectives. We'd also love to hear more from other states, or anybody else who would like to be part of that conversation, please reach out to myself or to Michelle, if you want to be part of that. I hope you continue to send people to attend the webinars.

Chris: I've passed the webinars onto some of our water regulators, but I haven't had an opportunity to attend myself. I think what we're seeing throughout Wyoming, especially in our portion of the Colorado River Basin, where there's just been a massive amount of money thrown at the problem. Part of that of those funds were designed to do some stream restoration ecosystem type projects. We're seeing some interesting nexus between those types of projects and how they affect our water rights. Because often it's going to re-time the flows, it's going to potentially result in additional consumptive use, which would take water away from some of our water rights and so we've got these programs that are designed to come in and try to help with drought impacts that are going to have other potential impacts. Perhaps it's being done so quickly that we're not seeing the full

picture with regard to what might happen if you install some of these. I've been trying to encourage my folks to tune in and pay attention because we've had similar projects in the past. It just seems to be scaling up and so I would encourage folks to pay attention to this because it is just going to be something that continues to happen.

Madeline: I appreciate that. With the influx of BIL funds, we've got a lot of money going toward these things.

Teresa: Madeline, I just wanted to thank you for doing the webinars with our stream alteration program in Utah. Because they were recorded, we were able to use them as training material for some of our new staff and so it's been really helpful and so I appreciate you working with us.

Madeline: That's awesome! Great to hear.

Mike Eberle: We've had a large number of people that see it for the first time via the recording rather than live - a lot more people than we thought.

Madeline: That's a good point, Mike. We do track who participates in our webinars. In fact, the numbers have actually been surprising. This has been a very successful series. We've had almost 100 people in some cases attend live online and similar numbers watching after the fact and so we've got hundreds of people from different states and different federal agencies tuning in. It really has been clear that it's of interest, and people are engaging in our Q&A sessions after our presenters speak.

DRAFT FY202-2025 COMMITTEE WORK PLAN

The first item in our work plan currently is state and federal collaboration regarding the adjudication of federal non-tribal water rights. I think we did a lot of good work moving that conversation before COVID hit, but I think it's languished since that point in time. I think we had some ideas on how we were going to continue to move that discussion forward, and probably through my fault, I haven't gotten that done. If folks are interested in picking that conversation back up, we certainly could do that. There's been a little bit of development on that front in Wyoming. I think one of the things that we had focused on in those discussions was coming up with agreements (MOUs) between the states and the federal agencies with regard to how to deal with water right permitting issues on federal lands. In Wyoming, our legislature tweaked that just a little bit with regard to stock rights, at least, which was one of our topics.

The next thing is CWA jurisdiction, which I think fairly would incorporate *Maui* now. This has always been kind of a group effort between the Legal and Water Quality Committees. As we think about how to develop that piece of the work plan, maybe figure out how we can rope in both the technical and legal aspects into one effort. The jurisdictional piece has always been a part of a question that's been in front of the Legal Committee, but we need to continue to coordinate with the Water Quality Committee.

There's the ad hoc group on reserved Indian water rights. I think for the most part that's been working with NARF.

Michelle: One thing for the Committee to consider, these settlements have moved away from being project-based and gone towards fund-based settlements. Our support for the Reclamation Water Settlement Fund may no longer be as relevant as it was in the past. I think at some point we need to revisit that if anybody is interested in working on it. We used to have a strong contingent of states that really cared about this issue, but they have all since retired, or moved on. We may need to rebuild an ad hoc group that works on this. Congress has recently created other funds (e.g., Indian Water Rights Settlement Completion Fund, P.L. 117-58) to address tribal settlements and how they are funded. Maybe we want to support those instead of the Reclamation Water Settlement Fund, which is just about depleted in terms of the projects that were specifically named. Plus, it may no longer be as relevant given the direction that the federal government, tribes and Congress are going. We may want to think of the legal implications of that, as well as changing our policy position that really emphasizes how we use the Reclamation Water Settlement Fund. So we probably want to put that in as an update to our work plan.

Chris: Folks may not know, but just very recently, the Navajo Nation and the Hopi Tribe have announced a draft of a potential settlement with regard to their tribal federal reserved water rights that would be really significant. It's got some interesting pieces that I think need a lot of work. But as I understand it, they plan to go to Congress and ask for at least some initial authorization and move that forward pretty soon.

The next item in our work plan is WRDA/Corps polices. If I'm not mistaken, this particular item should be addressed if ever we get our Western Water Cooperative Committees set up. Michelle, can you tell us the status of that?

Michelle: There was a hearing last week. Senator Cramer brought this up and questioned the Corps on this issue. Mike Connor said that they've done all the work that they need to do to get it set up the committee under FACA, but they don't have the money for the meeting reimbursements to appointed representatives. Senator Cramer was going to try find funding specific to this Western Water Cooperative Committee. I don't think it's a whole lot of money. I don't know if they need other money to do the administration of the Western Water Cooperative Committee, but it sounds like Senator Cramer is at least looking at it. They have gone through all the FACA Committee issues. I don't think it's actually a FACA Committee, but the Corps does and that's how they've proceeded with it. I think every single one of our states, maybe with the exception of Colorado, has appointed members, and North Dakota needs to replace one of theirs because she just left. But our states have been doing really well at appointing people to be on this committee.

Chris: Are there any thoughts? Assuming that this continues to move forward, and the Corps can find the massive amount of money necessary to travel to these places. Is there any desire to keep this on our work plan? Do you know Jen, anybody else that knows more about it?

Jen Verleger: I don't know more about it. It seems like it's very important to Senator Cramer, so I think he's going to continue to be pushing on it and try to get the money and make it happen. There's a lot of press releases about a thing that hasn't actually happened yet. I think it will happen eventually, but not before we go to Fargo or probably Kansas, or wherever after that.

Tony: Chris, I was just noting, as you mentioned, we have just been waiting on them. I think it would be easy enough for us as a Council to bring together those representatives to a virtual meeting to at least talk about the issues that we would like to see the committee address. That would at least move things that far forward without having to wait for funds to hold an in-person meeting.

Chris: That sounds like a good plan to me. It's still not entirely clear in my head, the scope of this particular entity and what it is we're going to be addressing. Obviously, some of our states have a much bigger interest in Corps issues than Wyoming and so I'd like to have a better understanding of the scope of what this group is going to be covering. We'll leave it on the work plan for now, subject to this Committee's approval.

The next item is groundwater. One of the topics is federal reserved water rights to groundwater, which was a really hot topic for the Council a number of years ago, when there were multiple efforts from federal agencies asserting this claim in different ways. Some of those claims have subsided, but the issue is still out there and perhaps coming around again. It might be worth our while to make sure that we're understanding the state of play with regard to some of those claims. I would definitely suggest that we think about picking that up a little bit and understanding where things are with it. Does anyone have any recent dealings with federal reserve claims to groundwater, or topics they would like to discuss? I would like to have a broader discussion about some of these during our summer meetings so that we can put our work plan in a better place than it currently is. The other groundwater issue is groundwater storage projects. I don't know that we've discussed this since I've been Chair of the Legal Committee.

We had multiple sub-topics under a general water rights category with regard to surveys that went out quite some time ago and potential reports associated with those surveys. We'll try to circle around and see where we're at with those by our Summer meeting. Are there any thoughts with regard to additional topics anybody would like to see on the Legal Committee Work Plan?

Theresa Wilhelmsen: On the non-tribal reserved water rights, we're actually working on two, and then on the tribal, we've got three going on so I'd be happy to be involved in the work plan for those things.

Chris: Okay. We will pick this up at our Summer meeting in Fargo.

STAFF UPDATES

Michelle: The Legislation and Litigation update can be found under Tab R. I did want to bring a few cases to your attention on the litigation side. There was a Nevada Supreme Court

decision on conjunctive management and state engineer authority. Nebraska had a case on interbasin transfers. Florida's assumption of CWA 404 authority has been fraught with legal problems. The Miccosukee Tribe and the Center for Biological Diversity filed separate lawsuits challenging EPA and Florida's authority over waters claimed by the tribe and over ESA issues. I'd actually like someone from Florida to come and talk to us about what's happening with their 404 program because it looks pretty awful. They are only the third state to try to assume 404 authority. If this is what states are going to have to go through in order to assume that authority, I think it's going to hinder some of our states from wanting to go down that road. I'm keeping an eye on that, and we may want to dive into that a little bit more at a future meeting.

Julie Pack: I would like to add to that we've been tracking what's been going on with Florida because Alaska's last legislative session was interested in getting funding to assume the 404 program. In light of that CBD decision, which is specifically focused on Endangered Species Act (ESA) grounds and Florida's approach, that's what Alaska was planning on doing as well. In light of the new uncertainty created by the court case and EPA's revisions to their 404(g) regulations allowing states to assume authority, Alaska is not trying to get funding from its legislature. Our view is that those revisions do not in fact facilitate state assumption but make it even more complicated and convoluted. The federal government is making it very difficult from our perspective for states to assume the program.

SUNSETTING POSITIONS FOR SUMMER 2024 MEETINGS

Position #470, regarding Endangered Species and State Water Rights.

OTHER MATTERS

There being no other matters, the meeting was adjourned.