

December 22, 2025

Josh Strauss  
Navajo Forestry Department  
P.O. Box 230  
Fort Defiance, Arizona 86504

Dear Mr. Strauss:

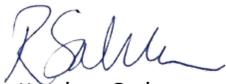
The California Air Resources Board (CARB) has reviewed the application for determination of Direct Environmental Benefits in the State of California (DEBS) for the Anew - Navajo Nation Forestry Project (CAFR5555) that was submitted to CARB on April 29, 2025, pursuant to the California Cap-and-Invest Regulation (Cal. Code Reg., tit. 13, § 95989).

The detailed report presented evidence that forest management activities within the Colorado River Basin can impact water quantity and water quality in California and that the planned forest management activities implemented by the offset project will provide water benefits to California. CARB staff concur that the activities in the submitted plan will reduce or avoid pollutants to the waters of the State. Therefore, CARB staff determine that CAFR5555 provides DEBS, and credits issued to CAFR5555 will have a DEBS designation beginning with credits issued for the initial reporting period.

<b>CARB Project ID</b>	<b>Project Name</b>	<b>DEBS to California</b>
CAFR5555	Anew - Navajo Nation Forestry Project	Yes

If you have questions regarding this response, please contact Shelby Livingston, Manager, Program Operation Section, via email at [Shelby.Livingston@arb.ca.gov](mailto:Shelby.Livingston@arb.ca.gov).

Sincerely,



Rajinder Sahota, Deputy Executive Officer, Climate Change and Research

cc: Matthew Botill, Division Chief, Industrial Strategies Division  
Natalie Lee, Assistant Division Chief, Industrial Strategies Division  
Mark Sippola, Branch Chief, Climate Change Program Evaluation Branch  
Wesley Dyer, Attorney III  
Brock Williams, Attorney

California Air Resources Board  
c/o Shelby Livingston, Manager, Program Operations Section  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: RFI Submittal Supplement: Application for Determination of Direct Environmental Benefits (DEBs) to California

Dear Shelby Livingston,

On behalf of the OPO, Navajo Nation, Anew Climate (Anew) submits this application for the determination of Direct Environmental Benefits (DEBs) to California for the compliance Improved Forest Management (IFM) project, **Anew – Navajo Nation Forestry Project (CAFR5555)**.

The California Cap-and-Trade Regulation defines a Direct Environmental Benefit as follows:

“Direct environmental benefits in the State refers to the reduction or avoidance of emissions of any air pollutant in the state or the reduction or avoidance of any pollutant that could have an adverse impact on waters of the state.” (§ 95802).

The regulation further describes how DEBs will be evaluated:

“Any project located outside the State of California may submit the following information to ARB to enable a determination of whether the project provides direct environmental benefits in the State. Such determination must be based on a showing that the offset project or offset project type provides for the reduction or avoidance of emissions of any air pollutant that is not credited pursuant to the applicable Compliance Offset Protocol in the State or a reduction or avoidance of any pollutant that is not credited pursuant to the applicable Compliance Offset Protocol that could have an adverse impact on waters of the State.

1. Scientific, peer-reviewed information or reports supporting a claim that the offset project or offset project type results in this type of reduction or avoidance of any pollutant in the State;
2. Governmental reports from local, state, or national environmental, health, or energy agencies, or multinational bodies (such as the Intergovernmental Panel on Climate Change) supporting a claim that the offset project or offset project type results in this type of reduction or avoidance of any pollutant in the State; or
3. Monitoring or other analytical data supporting a claim that the offset project or offset project type results in this type of reduction or avoidance of any pollutant in the State.”  
The Anew – Navajo Nation Forestry Project IFM compliance project provides DEBs to California through

The Anew – Navajo Nation Forestry Project IFM compliance project is entirely within the Colorado River watershed, which supplies more than a third of Southern California’s drinking water. The

forestlands within the project area provide DEBs to California by mitigating soil erosion and sedimentation, reducing sediment in water bodies, filtering water pollutants, and enhance groundwater recharge by protecting plant communities within the Colorado River watershed.

As an IFM project under the Compliance Offset Protocol for U.S. Forest Projects (June 25, 2015), Navajo Nation has committed to significantly reducing harvest levels compared to the allowable cut volumes, and implementing management practices such as pre-commercial thinning to maintain forest health and resilience. These actions contribute to sustaining ecosystem services that benefit California's water resources.

Enclosed with this application, please find the technical report titled "Literature Review for Applicability of Direct Environmental Benefits (DEBs) in the State of California on Behalf of Natural Nation." This report provides supporting evidence that the Natural Nation project delivers measurable DEBs to California.

Sincerely,

Josh Strauss

A handwritten signature in black ink, appearing to read "Josh Strauss", with a long horizontal flourish extending to the right.

President, Environmental Solutions, Anew Climate

# **Literature Review for Applicability of Direct Environmental Benefits in the State of California**

**28 April 2025**

**Prepared for: Anew – Navajo Nation Forestry Project**

**Prepared by: Anew Climate, LLC**

The logo for 'anew' is displayed in a bold, lowercase, blue sans-serif font.

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## Introduction

Anew Climate, on behalf of the Navajo Nation, has developed an improved forest management (IFM) carbon project encompassing 526,564 acres of forestland in northern New Mexico and Arizona. These lands are Indian forest land, as defined by 25 CFR § 163 and specifically excluding Indian allotments, within the exterior boundaries of the Navajo Nation (25 CFR § 163.1). The primary goals of the project are to increase carbon storage and improve forest health and resilience, with concomitant goals to improve water and air quality.

This project produces direct environmental benefits to the State of California as defined by California State Assembly Bill 398: “the reduction or avoidance of emissions of any air pollutant in the state or the reduction or avoidance of any pollutant that could have an adverse impact on waters of the state” (AB 398; Chapter 135, Statutes of 2017), and is pursuant to Section 95989 (b). Among others, these benefits include water quality amelioration achieved through improved forest management practices. Notably, the project impacts tributaries of the Colorado River. The entire project boundary is contained within the Colorado River watershed. The Colorado River, in turn, provides more than a third of Southern California’s drinking water (PPIC Water Policy Center 2018).

Despite an allowable cut volume of 15.9 million board feet per year on the Navajo Nation’s forestland (Navajo, 82), last year, no commercial harvest occurred. Instead, the Navajo Nation focused on maintaining forest health and resilience through pre-commercial thinning. In comparison to conventional silvicultural practices, these conservative practices increase forest biomass and retention, erosion control, and forest health, which in turn improves the quality and diversity of the project’s streams and rivers. These waterways serve as vital natural resources for California and have intrinsic ecological value unto themselves.

A host of scholarly literature corroborates that forest retention decreases sediment loads of and pollutant runoff into adjacent streams and waterways (Shah et al. 2022). Conversely, water quality decreases with intense forest harvests and associated harvesting infrastructure (Binkley and Brown 1993). For instance, a 2022 study published by Fielding et al. demonstrated that clearcut prescriptions significantly increase soil erosion and sediment concentration in streams. And, while water quality may be improved with proper implementation of best management practices (BMPs), intense silvicultural prescriptions reduce it (Ensign and Mallin 2001). It is also the case that many generic BMPs are not successful in lowering runoff and total sediment yields (Picchio et al. 2021). Thus, it is imperative to retain forest cover to ensure high water quality.

Additionally, streams in forests undergoing silvicultural treatments that remove most of the basal area have increased water temperatures (Brown and Krygier 1970, Patric 1980, Johnson and Jones 2000); these increased temperatures cause higher rates of chemical reactions, leading to lower water quality (USGS 2019). In summary, there is a clear link between intense forest harvesting and decreased water quality.

## Watershed Management within the Navajo Nation

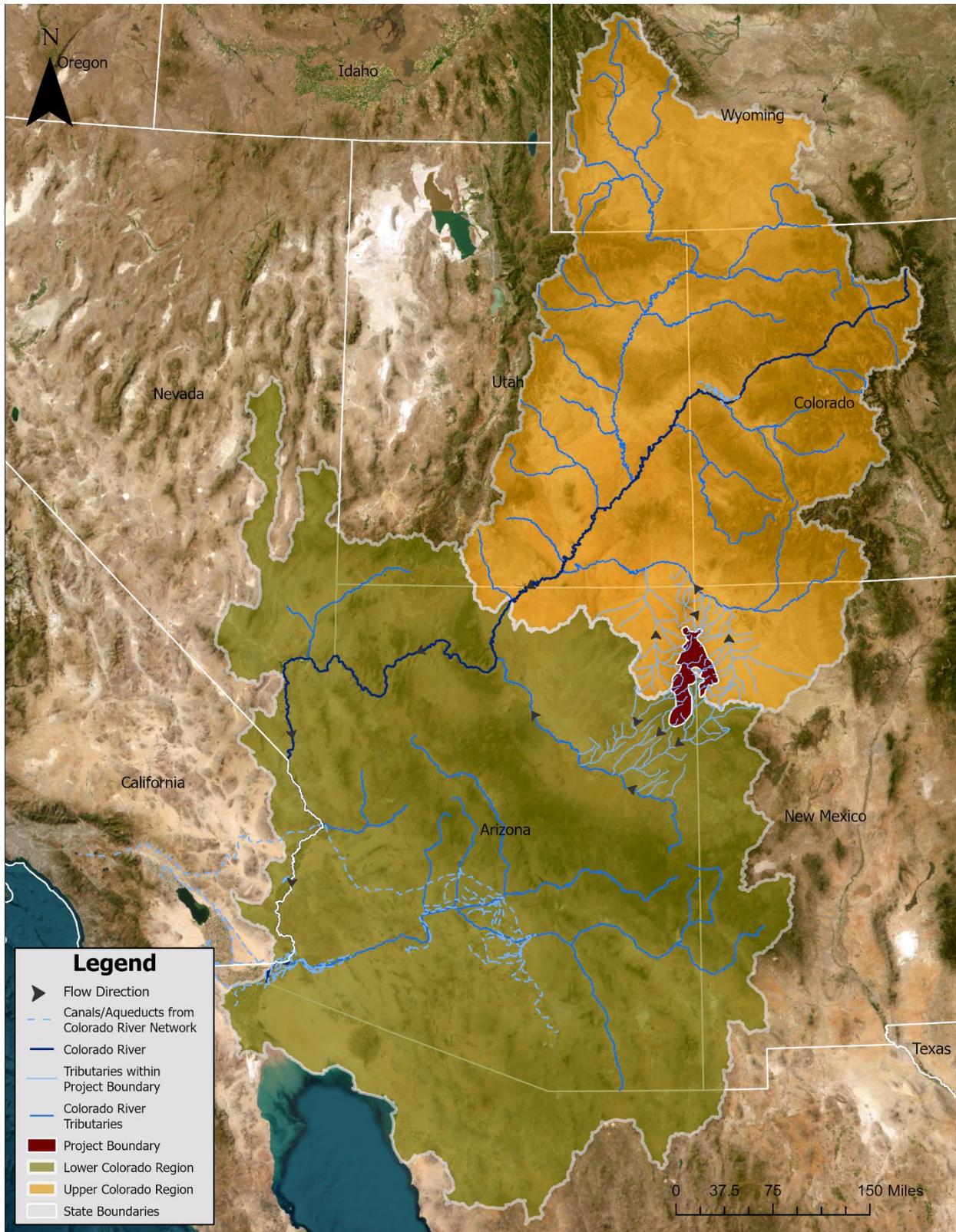
Water resource management and care for water is a core principle of the Navajo Nation, as stated in the tribe's Forest Management Plan:

“Water is fundamental to life and public health, and has a significant economic and cultural significance. Water resource management includes managing water quality and quantity and is critical in preserving and protecting water for consumption, industry and agriculture.”

The Navajo Nation exists within a drought-prone region, increasing the importance of thoughtful watershed management, as noted in the Navajo Nation Resource Assessment for Navajo Forestlands. While the Nation has long recognized the need for water resource management, several persistent concerns – including securing water rights, addressing infrastructure gaps, coordinating across multiple jurisdictions– have limited the full realization of these goals.

The Navajo Nation Department of Water Resources (NDWR), supported by the Navajo Tribal Utility Authority, leads planning and implementation efforts outlined in the Water Resources Management and Development Strategy for Navajo Nation. These initiatives include local and regional water supply projects, irrigation improvements, floodplain management, and watershed restoration. Revenue generated from carbon credit sales under the project will provide valuable financial support to help advance the water management goals of the NDWR and the Tribal Utility Authority, strengthening the Nation's capacity to protect and enhance its critical water resources.

The Anew - Navajo Nation Forestry Project complements and strengthens these efforts by improving forest health and hydrologic function across the project area, thereby delivering tangible benefits to the Nation's broader water management goals. The project directly enhances watershed conditions by reducing erosion, stabilizing soils, and promoting healthy, resilient forests, all of which contribute meaningfully to the protection of surface and groundwater resources.



**Figure 1.** A watershed-scale map illustrating the flow of water from the project site to the Colorado River along California’s southeastern border.



**Figure 2.** A map illustrating the flow of water from the project site to the Colorado River along California’s southeastern border.

## The Watershed Scale

The Navajo Nation Forestry Project comprises the Upper San Juan subregion (HUC1408), and the Little Colorado subregion (HUC1502). These watersheds are nested within the Upper Colorado River Basin (HUC15) and the Lower Colorado River Basin (HUC15030107) which drain to the State of California. At the Parker Dam, constructed on the Colorado River at the California-Arizona border downstream of both the Little Colorado and San Juan confluences, is the origin of the Colorado River Aqueduct, a water diversion which transports essential drinking water for millions of Southern California residents and water for crop irrigation in the Paulo Verde, Imperial, and Coachella valleys (Los Angeles County Public Works Department 2025). Since the management activities occurring within the project boundary have measurable positive effects on downstream water health, and the project is entirely within the Colorado River's watershed (and specifically upstream of the Colorado River Aqueduct), there are direct environmental benefits to the state of California. Subsequent report sections discuss the importance of specific hydrological connections and how they influence California's waterways and water resources.

## Direct Hydrological Pathways

The scientific community has firmly established the importance of upstream headwaters on downstream water quantity and quality. A review and synthesis of over 1,200 publications conducted by the US Environmental Protection Agency (EPA) found that streams, riparian areas, wetlands, and open waters all have significant downstream effects on the integrity of downstream waters (EPA 2015). The EPA also determined that the effects these headwaters have on downstream water quantity and quality are cumulative. The project boundary contains the headwaters of both the Little Colorado and San Juan Rivers, both of which flow into the Colorado River upstream of the Parker Dam and the Colorado River Aqueduct diversion, which provides essential water resources to Southern California including the cities of Los Angeles, San Diego, Anaheim, Chula Vista, Garden Grove, Glendale, Huntington Beach, Irvine, Long Beach, Moreno Valley, Oceanside, Oxnard, Pomona, Riverside, and Santa Ana (Klausmeyer and Fitzgerald 2012).

## Little Colorado Watershed

The Little Colorado River, located in the Little Colorado Watershed, serves as a major tributary to the Colorado River. Each year, approximately 280,000 acre-feet of water flow from the Little Colorado into the Colorado River upstream of Parker Dam and the Colorado River Aqueduct (USGS Water Data Services, Gauge 09402300). The headwaters of the Little Colorado River flow in part from the northern portion of the Little Colorado Watershed, and

some tributaries originate within the Navajo project area. Therefore, forest management activities associated with the Anew – Navajo Nation Forestry Project will have a direct impact on the water quality and quantity in the Little Colorado River, and by extension the Colorado River. The Colorado River provides numerous direct environmental benefits to the state of California, including water for irrigation to support agriculture, clean hydroelectric energy, and drinking water for millions of Southern California residents. Therefore, improved forest management within the Little Colorado Watershed has downstream benefits for the Colorado River, which in turn provides direct environmental benefits to California residents.

## San Juan Watershed

The San Juan River, located in the San Juan Watershed, serves as a major tributary to the Colorado River. Each year, approximately 981,000 acre-feet of water flow from the San Juan into the Colorado River upstream of Parker Dam and the Colorado River Aqueduct (USGS Water Data Services, Gauge 09379500). The headwaters of the San Juan River flow in part from the southern portion of the San Juan Watershed, and some tributaries originate within the Navajo project area. Therefore, forest management activities associated with the Anew – Navajo Nation Forestry Project will have a direct impact on the water quality and quantity in the San Juan River, and by extension the Colorado River. The Colorado River provides numerous direct environmental benefits to the state of California, including water for irrigation to support agriculture, clean hydroelectric energy, and drinking water for millions of Southern California residents. Therefore, improved forest management within the San Juan Watershed has downstream benefits for the Colorado River, which in turn provides direct environmental benefits to California residents.

## Direct Environmental Benefits to California

### Water Quantity

Water quantity regards the regular supply of water to hydrologic systems within, adjacent to, or downstream of forests. Because intact forests more readily mediate water runoff and erosion caused by rain events, they can supply hydrological connections with a steady source of water. Managing forests in the Little Colorado and San Juan headwaters sustainably and reducing the intensity of harvest, as is done in this project, provides myriad benefits to the quantity of water flowing to Southern California by way of the Colorado River. Benefits to water quantity include:

1. **Enhancement of water retention and storage:** Improved forest management leads to more organic matter remaining within the forested landscape. Forest soils rich in

organic matter have a higher water-holding capacity. Rainfall that is captured is gradually released downstream as it percolates through the ground (Brooks 2012).

2. **Reduction of evaporation rates:** Retaining trees and intact canopies provides a shaded environment to the forest floor in the headwaters. This increase in shade reduces evaporation rates, increasing overall water availability (Liu et al. 2021).
3. **Mitigation of flooding and peak flow events:** The presence of an intact tree canopy and understory plants enhances the capacity of soil to absorb and retain water, which in turn reduce the speed and volume of surface water runoff during flooding and peak flow events within a forest (Neary et al. 2005). This can not only minimize the negative impact of flooding events on downstream human and ecological communities but also creates more regulated outputs to downstream hydrologic connections including the Colorado River Aqueduct
4. **Stream flow stability:** Intact forests balance water availability across seasons by regulating precipitation events through vegetation and soil. As precipitation is retained within vegetation and soil, it is released downstream at a more stable and reliable rate (Neary et al. 2005). This stability is essential for specific ecological communities and animal species that rely on water, as well as for residential and agricultural users in California who depend on a reliable water source.

Conversely, many of these benefits related to water quantity are negated or reversed in a forest management scenario that includes more intense harvest or clearcutting:

1. **Increased runoff:** Intense harvest operations reduce the quantity of organic matter left in the forest. Soil lacking in organic matter has a lower capacity to absorb water, meaning that more water is lost downstream in the immediate aftermath of a precipitation event or spring snowmelt and less water is retained within the hydrological system. Likewise, the absence of roots increases fluvial erosion, which may cause detrimental ecological effects (Neary et al. 2005).
2. **Higher flood risk:** Without forest cover, water moves more freely and quickly through landscapes, which increases the frequency and size of flooding events downstream (Neary et al. 2005).
3. **Decreased groundwater levels:** Tree roots allow for deep infiltration of water into soil. Intense harvest and clearcutting can eliminate this pathway for groundwater recharge, reducing the storage capacity for the hydrological system. This groundwater is an essential source for hydrologic features like springs and wells (Brooks et al. 2012).
4. **Stream flow instability:** Forest loss in stream headwaters leads to stream flow instability. Because there is no forestland present to regulate water flow, these hydrologic features experience larger fluctuations in water quantity following

precipitation and drought events, and flow rates and water availability is more immediately beholden to and impacted by weather and climatic events.

## Water Quality

Water quality refers to the physical, chemical, and biological characteristics of water that determine its suitability for a particular purpose or within a particular context. Like water quantity, proper sustainable forest management in the Little Colorado and San Juan headwaters can improve the quality of water making provided to Californians from the Colorado River. Water quality benefits include:

1. **Pollutant filtering:** The presence of intact forest and healthy vegetative root systems helps to retain large proportions of sediment and pollutants in the landscape and soil, before such pollutants reach the main water body of the Colorado River (Brooks et al. 2012; DeBano et al. 1998).
2. **Erosion control:** Roots of trees and vegetation hold soil together and prevent it from erosion caused by aeolian or fluvial processes, thereby helping to greatly reduce sediment loads flowing downstream into the Colorado River (Neary et al. 2005).
3. **Nutrient cycling regulation:** Forests and their biomass play integral roles in nutrient cycles, especially the carbon, nitrogen, and phosphorus cycles. Maintaining forest cover is vital to delivering essential nutrients to water bodies, streams and rivers.
4. **Water temperature regulation:** The shade provided by an intact forest canopy cools water temperatures. Cooler water temperatures prevent the growth of bacterial and nutrient pollutants that thrive in warmer waters, and provide better spawning habitat for numerous aquatic species.

Conversely, intensive forest management in the headwaters of the Little Colorado and San Juan Rivers can degrade the quality of water flowing into Southern California (Klausmeyer and Fitzgerald 2012). These impacts include:

1. **Loss of organic matter and nutrients:** Leaf litter and other organic matter contribute to the health of waterways by providing water with nutrients in regulated quantities. More intensive silvicultural approaches result in a decrease in the amount of organic matter left on the landscape that regulates ecosystems and hydrology.
2. **Increased sedimentation:** Erosion increases in the absence of root structures, leading to higher quantities of sediments in water (Neary et al. 2005). Intensive forest management approaches in the Little Colorado and San Juan headwaters would lead to increased sediment loads flowing downstream into the Colorado River. This negatively impacts ecological communities downstream and results in an increase in sediment loads in the water used by millions of Southern Californians.

3. **Increased pollutant loads:** Pollutants deposited in areas devoid of forests are more easily transported into nearby waterways during precipitation and other weather events. This can have severe consequences for downstream water quality as pollutants accumulate (Klausmeyer and Fitzgerald 2012, Neary et al. 2005).

## Conclusions

As discussed in this report, responsible and sustainable forest management is paramount to maintaining and improving water quality. The Anew – Navajo Nation Forestry Project offers significant environmental and ecological benefits, not only to the Navajo Nation but also to the broader regional ecosystem, including California. By focusing on maintaining forest health and resilience through sustainable management practices like pre-commercial thinning, the project effectively improves water quality and quantity within the watersheds of the Colorado River Basin, which are vital to downstream communities, including those in California.

The project’s emphasis on forest retention has been shown to decrease sedimentation, reduce flood risks, stabilize stream flows, and regulate water temperatures, all of which are critical for maintaining the health of aquatic ecosystems. In contrast, intensive silvicultural practices, such as clearcutting, can significantly degrade water quality by increasing runoff, erosion, and water temperature, all of which adversely affect downstream water bodies.

In alignment with the Navajo Nation’s core value of water stewardship, the IFM project also contributes to broader water resource management goals, helping to mitigate some of the challenges faced by the Navajo Nation in securing and managing its water resources. By promoting the sustainable use of forest resources, this project ensures long-term benefits for both the environment and communities dependent on the Colorado River watershed, reinforcing the interconnectedness of forest health, water quality, and the resilience of ecosystems across multiple jurisdictions.

Ultimately, the Anew – Navajo Nation Forestry Project exemplifies the importance of proactive, sustainable land management in mitigating climate impacts, conserving water resources, and fostering ecological balance, with tangible positive outcomes for the Navajo Nation and downstream stakeholders, including those in California.

The benefits to water quantity and quality of the Colorado River are in addition to the greenhouse gas reductions for which the IFM project described here is receiving credits. Therefore, the Anew – Navajo Nation Forestry Project meets the requirements of Section 95989(b) of the Cap-and-Trade Regulation and should be awarded Direct Environmental Benefits of the State status.

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