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December 11, 2023

Submitted via E-Mail to: CRinterimops@usbr.gov
U.S. Bureau of Reclamation
Reclamation 2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region,
125 South State Street, Suite 8100
Salt Lake City, UT 84138

Re: October 2023 Revised Draft Supplemental Environmental Impact Statement, Near-term Colorado River Operations

Dear Project Manager:

The City of Yuma (Yuma) appreciates the opportunity to provide comments for the October 2023 Revised Draft Supplemental Environmental Impact Statement, Near-term Colorado River Operations (RDSEIS). Yuma is the third largest municipality in Arizona outside the Phoenix metropolitan area, and currently provides water services to over 122,000 people. The community relies on Colorado River water to meet its drinking water demands and has limited access to quality water beyond what the river provides. The importance of the Colorado River to Yuma and its residents cannot be overstated. The relationship between community and the Colorado River predates recorded history, illustrated by the fact Yuma has one of the first recorded Lower Basin Colorado River allocation entitlements dating back to 1893. Yuma recognizes the complexity and level of effort that has been dedicated to the topic of future river operations and supports future sustainable management of the Colorado River.

Yuma is concerned that the RDSEIS assessment fails to address one of the most negatively impactful activities affecting the Colorado River system, an activity that is currently being supported by the Bureau of Reclamation (BOR). Yuma requests that BOR reconsider its current policy determinations and future decisions for off-river and out-of-basin water transfers for Colorado River waters. Off-river water transfers are diminishing the Colorado River system of its resources. And the transfers from rural communities to more affluent metropolitan communities disparately impact rural residents and rural economic opportunities.

Yuma urges BOR to provide an injunction to future off-river water transfers of Colorado River water and institute a stay for future water transfer applications until the Colorado River system is capable of fulfilling its current water allocation commitments in-turn. It is known that the Colorado River is overallocated and to prevent perpetuating an already insolvent system, BOR should not support additional unused uses of the Colorado River. BOR river operational guidelines and plans, including the modeling and forecasted demands within the RDSEIS, are reflective of current steady-state water usages and in-basin water hydrologic interconnections. Any river operational plans, including the RDSEIS, should address the adverse impacts of out-of-basin and off-river water transfers, including:

- Permanently transferring water off-river and out-of-basin reduces the amount of wet water in the river system that is the sole source of supply for many on-river communities. It also reduces the effectiveness of water management tools, such as return flow and effluent creation and storage for on-river municipalities to respond to future river shortages.
- Disproportionate socio-economic impacts. It is reasonably foreseeable that permanently transferring water will deprive agriculturally dependent communities of critical economic opportunities for already lower income and oftentimes minority residents. Decreased agricultural activity will also increase air pollution from dust and exposure to airborne contaminants.
- Environmental impacts on national wildlife refuges and special status species dependent on River flows and quality. On-river communities rely on the health of the river to sustain unique ecological resources that support local environmental tourism. Permanently transferring river water away from downstream stretches of river will impair these unique, protected resources, such as the Yuma Clapper Rail, Native Bonytail Fish, Razorback Sucker, and Southwestern Flycatcher.
- Decreased water supply reliability has impacts at the local, state, and the federal level. Wide-ranging regulatory impacts include the State of Arizona's decreased flexibility to respond to river shortages due to wet water leaving on-river reservoirs, diminished ability to participate in land fallowing programs to meet water use reductions, reduced ability to create system conserved water, and related effects on the development of federal and inter-state regulatory plans that would otherwise account for transferred water remaining on-river.

Arizona's on-river communities, including Yuma, are heavily invested and reliant upon the sustainable management of the Colorado River. Yuma supports the RDSEIS approach and Proposed Action, given BOR provides for specific assurances and commitments to sustainable river management, including incorporating assessments for the long-term impacts of off-river water transfers are included within the Final Revised Supplemental Environmental Impact Statement.

Respectfully submitted on behalf of the City of Yuma and its Mayor and City Council,



John D. "Jay" Simonton
Acting City Administrator

Mayor Douglas J. Nicholls

Deputy Mayor Chris Morris
Councilmember Gary Knight
Councilmember Michael Shelton

Councilmember Ema Leas Shoop
Councilmember Arturo Morales
Councilmember Carol Smith