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US Bureau of Reclamation
2007 Interim Guidelines SEIS Project Manager
Upper Colorado River Basin Region
125 South State Street, Suite 8100
Salt Lake City, Utah 84138

VIA ELECTRONIC MAIL ONLY to: CRinterimops@usbr.gov

Subject: Comments Regarding the Revised Draft Supplemental Environmental Impact Statement (Revised Draft SEIS) for Near-term Colorado River Operations

Dear SEIS Project Manager,

The City of Tucson (Tucson) is pleased to provide the following comments on the Revised Draft Supplemental Environmental Impact Statement (Revised Draft SEIS) for Near-term Colorado River Operations.

The Revised SEIS considers two alternatives:

- The **No Action Alternative**, required by the National Environmental Policy Act, describes the continued implementation of existing agreements that control operations of Glen Canyon and Hoover Dams.
- The **Proposed Action ("Lower Division Proposal")**, models changes to operations for both Glen Canyon Dam and Hoover Dam. The Proposed Action includes assumptions for a total of 3 million acre-feet (MAF) of SEIS conservation through 2026, with a minimum of 1.5 MAF physically conserved by the end of calendar year 2024. Under the Proposed Action, tier-based reductions and contributions shall be limited to the existing 2007 Interim Guidelines, Lower Basin DCP, and Minute 323.

Recommendation: The City of Tucson and Tucson Water recommend the implementation of the Proposed Action ("Lower Division Proposal").

The Proposed Action ("Lower Division Proposal") reduces the potential that continued low-runoff conditions could lead to Lake Powell and Lake Mead declining to critically low elevations. This protects critical infrastructure at both reservoirs and balances overall operational risks in the Colorado River Basin. The conservation efforts within the Lower Action Proposal are also consistent with the congressional direction to mitigate the impacts of long-term drought.

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In support of the Bureau's efforts to manage the Colorado River system to benefit all users, and in cooperation with other Arizona users of the Colorado River system, Tucson participated in voluntary system conservation to forestall a shortage declaration leaving between 14% and 18% of our annual allocation of Colorado River water (144,191 AF) in Lake Mead per calendar year. Tucson's proactive, voluntary reduction volumes by year are listed below.

- 2017 – 26,500 AF (18% of annual allocation)
- 2018 – 20,860 AF (14% of annual allocation)
- 2022 – 25,640 AF (18% of annual allocation)

Since the shortage declaration, Tucson has entered into a three-year System Conservation Implementation Agreement (SCIA) with the Bureau of Reclamation and the Central Arizona Water Conservation District (CAWCD) to voluntarily reduce deliveries of Colorado River Water to Tucson via the Central Arizona Project (CAP) canal by up to 35% of Tucson's annual allocation. That portion of Tucson's Colorado River Water allocation not delivered in calendar years 2023, 2024, and 2025, will remain in Lake Mead to benefit the Colorado River System. Tucson's voluntary reduction volumes by year are listed below. These efforts are indicative of our community's belief that cooperation among all users of the Colorado River System is essential to preserving the Colorado River as a sustainable water resource for the region.

- 2023 – 50,000 AF (35% of annual allocation)
- 2024 – up to 30,000 AF (up to 21% of annual allocation)
- 2025 – up to 30,000 AF (up to 21% of annual allocation)

Tucson supports the Bureau's efforts to manage the Colorado River system in such a way as to provide a secure water future for all users of the system. Tucson remains committed to water conservation efforts in support of the shared goals. Working cooperatively to be stewards of the Colorado River is critical to ensure that the region's lifeline is preserved.

Sincerely,



John Kmiec, MPA
Director
Tucson Water, City of Tucson