



December 19, 2022

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

*Via email to CRinterimops@usbr.gov*

**Re: Request for Comment on Supplemental Environmental Impact Statement for Near-term Colorado River Operations - 87 FR 69042**

The Arizona Municipal Water Users Association (AMWUA) appreciates the opportunity to respond to the U.S. Bureau of Reclamation's request for comments in the Notice of Intent to Prepare a Supplemental Environmental Impact Statement (SEIS) for the 2007 Colorado River Interim Guidelines as published in Federal Register Notice 87 FR 69042. AMWUA is comprised of ten municipalities in the Phoenix metropolitan area who collectively provide water to over 3.7 million residents, more than half of Arizona's population. The AMWUA member cities – Avondale, Chandler, Gilbert, Glendale, Goodyear, Mesa, Phoenix, Peoria, Scottsdale, Tempe – each hold a subcontract for Colorado River water delivery through the Central Arizona Project (CAP) system and are the recipients of over 470,000 acre-feet annually, more than 40% of CAP's total deliveries in recent years.

Water is the lifeblood of the AMWUA cities. The Colorado River is a critical supply to sustain the communities our providers serve and that supports homes, schools, higher education institutions, hospitals, high-tech manufacturers and much more throughout the Valley. We concur with the statement in the Notice of Intent that the unprecedented risk facing the Colorado River Basin necessitates additional actions from the federal government. The threat of continued dry hydrology was effectively displayed in the SEIS Public Webinars held by Reclamation, and we commend the Bureau for its excellent modelling and communication of these risks to Basin stakeholders. We believe it is important for Reclamation to continue to utilize dry scenarios into its decision-making in recognition that past hydrology may not be representative of the Colorado River's future in our warming climate.

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## Arizona Municipal Water Users Association



AMWUA supports Reclamation’s development of the SEIS and consideration of a Reservoir Operations Modification Alternative. Whether or not the Basin States offer a consensus alternative, we urge Reclamation to consider all of the pathways available so that Reclamation can take decisive action necessary to stabilize the Colorado River system. It is likely that the measures adopted through the SEIS should continue through 2026. AMWUA has prepared the following comments on behalf of ten municipalities that are heavily invested in the fate of the Colorado River.

**I. Section 2. Determination of Lake Mead Operation During the Interim**

AMWUA recognizes that additional shortage reductions in the Lower Basin are necessary to arrest the decline of Lake Mead’s storage volume. We urge Reclamation to spread additional reductions equitably across the three States when developing revisions to Section 2.D. In a Tier 3 Shortage condition, Arizona Priority 4 (P4) water users must forego 720,000 acre-feet (AF) – far more than the prescribed reductions of California or Nevada. Additional cutbacks that are borne only by Arizona’s P4 water users will not only be inadequate to stabilize Lake Mead but would also result in reduced CAP volumes that are insufficient for the health, safety, and economic needs of our communities.

Equitable demand reductions are necessary to stabilize the Colorado River system. In determining the basis for additional reductions under Section 2.D. Reclamation should consider utilizing the relative volumes and/or proportions of evaporation and system losses attributable to deliveries within each State.

**II. Section 6. Coordinated Operation of Lake Powell and Lake Mead During the Interim Period**

It is evident that Lake Powell’s elevation will continue to decline precipitously should dry hydrologic conditions and low inflow scenarios continue. We recognize that reduced releases from Glen Canyon Dam are needed to protect the reservoir’s infrastructure and stabilize Lake Powell. Reclamation’s modified operations of Lake Powell must also have an objective to maintain stability at Lake Mead. Reducing releases from Glen Canyon Dam with no consideration for Lake Mead’s elevation will quickly drive Mead to deadpool in a matter of years, as shown in Reclamation’s Low-



Flow Hydrology & Operational Scenarios. AMWUA suggests that Lake Mead also have a protection level at 1,000' amsl that is achieved by a combination of Lower Basin shortage reductions and balancing releases from Glen Canyon Dam.

Including balancing releases from Glen Canyon Dam to protect Lake Mead elevations also reduces the risk of the Upper Basin failing to meet its 10-year, 82.5 MAF delivery obligation at Lee's Ferry, and could help sustain the crucial ecological resources in the Grand Canyon.

Even in the event of a productive runoff season, releases from Glen Canyon Dam should be appropriately reduced to stabilize Lake Powell, while providing sufficient stability for Lake Mead, in recognition of the need for conservative operations moving into the future.

AMWUA does not support any continuation of "operational neutrality" when implementing reduced releases from Glen Canyon Dam pursuant to this SEIS or future Upper Basin Drought Operations Response Agreement (DROA) actions.

### **III. Section 7. Implementation of Guidelines**

AMWUA recognizes that providing for a mid-year review and reduced deliveries from Lake Mead is a strategy to align reservoir operations more closely with annual inflows and water availability. However, mid-year adjustments are very concerning for water users who need sufficient time to make operational decisions. Municipal water providers are already dealing with an unacceptable level of uncertainty in Colorado River water availability. Any modifications to the mid-year review process that result in reduced deliveries from Lake Mead must have very clear triggers and provide as much advanced notice to water users as possible.

We would prefer reservoir operations to have a more cautious release projection based on conservative hydrology forecasts (i.e., not the Most Probable projection) at the start of the water year in an effort to avoid an unplanned, mid-year release reduction.



#### **IV. Public Health and Safety**

As municipal water providers that are ultimately responsible for serving water directly to end users, the AMWUA cities are on the front lines of ensuring public health and safety for their communities. When integrating public health and safety into Colorado River operational decision-making, it is critical to understand that public health and safety cannot be reduced down to an arbitrary allotment for minimum drinking water needs. Schools, hospitals, businesses, high-tech industries, manufacturers, military installations and more need water to ensure that their critical functions of national importance are able to continue.

Furthermore, public health and safety determinations for water can only be made on region-by-region basis to take into account unique elements of different communities. In the Phoenix metropolitan area, water is a critical tool in combatting the deadly hazard of the urban heat island. In 2020, Phoenix had 145 days over 100° and Maricopa experienced 323 heat-associated deaths. The same warming climate that is threatening the Colorado River system is also driving increased incidences of extreme heat that can have deadly consequences.

Water is critical to sustain our desert-adapted trees and urban ecosystems that provide natural cooling benefits and mitigate the urban heat island. Trees also provide significant air quality benefits – a much needed, green pollution control measure in the one of the most challenged metropolitan areas in the country for ozone and particulate nonattainment.

#### **V. Evaporation and System Losses**

AMWUA supports Reclamation's intent to address methodologies for the assessment of evaporation, seepage, and other system losses as stated in the Federal Register Notice. Reclamation's methodology should factor in a water user's location and history of use when determining an entity's relative contribution to evaporation and system losses.

Assessments should be made across all Lower Basin contractors. All water users who draw upon the Colorado River enjoy the benefits of this water supply and



simultaneously contribute to evaporation and system losses, regardless of priority. Accordingly, it is reasonable and appropriate for all water users to share in the assessment of these losses.

## **VI. Upper Basin Drought Response Measures**

While the scope of the SEIS and Reclamation's proposed measures is limited to revisions of the 2007 Interim Guidelines, AMWUA requests that Reclamation consider additional actions that can be taken in the Upper Basin to contribute to the stabilization of Lake Powell. Within the SEIS or without, Reclamation's analyses should evaluate the impacts of some level of Upper Basin water use reductions as well as continued DROA releases to Lake Powell. The impacts of climate change are impacting water users throughout the Colorado River Basin, and all water users, in all sectors, in all states should share in the responsibility of taking action to protect the system.

Development of this SEIS is an appropriate response to the crisis situation on the Colorado River, and we continue to urge Reclamation to take decisive action to stabilize the system so that all water users through the Basin can benefit from the Colorado River for generations to come. On behalf of the ten municipalities that provide water to over half of Arizona's population, AMWUA appreciates the opportunity to provide input on the SEIS and looks forward to continued engagement with Reclamation throughout this process

Sincerely,

Warren Tenney  
Executive Director