



December 20, 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

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

The City of Goodyear ("Goodyear" or "City") appreciates the opportunity to provide comments on the Notice of Intent to prepare a Supplemental Impact Statement (SEIS) for the 2007 Colorado River Interim Guidelines, and is submitting this letter to support and reiterate the comments made by the Arizona Municipal Water Users Association (AMWUA), of which we are a member.

Goodyear is a growing community, with an annual growth of 17%, located just 30-minutes west of the Phoenix metropolitan area. Properly managing water resources and investing in Goodyear's water future has long been a priority for the city. Goodyear has invested 150 million dollars in infrastructure to treat and deliver Colorado River water, transitioning from being one-hundred percent reliant on non-renewable groundwater to renewable surface water. Today, like other municipal providers, we are faced with the uncertainty of deliveries from the Colorado River. To ensure the long-term ability to meet the water demands of our community, we need reliability and stability of our future supplies.

Reclamation's development of the SEIS framework is an appropriate response to the crisis situation being faced today on the Colorado River. Goodyear requests Reclamation's serious consideration of the responses submitted by AMWUA to Reclamation's request for feedback.

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

Increased shortage cuts must be shared amongst all Lower Basin states to stabilize the system. Additional cuts that are borne only by Arizona's P4 water users will be inadequate to save Lake Mead and will reduce CAP delivery volumes to drastically low levels that are insufficient for health, safety and economic needs of our communities. In determining the basis for additional reductions to Arizona, California, and Nevada under Section 2.D., Reclamation should consider utilizing the relative volumes of evaporation and system losses attributable to deliveries within each state.

- **Section 6. Coordinated Operation of Lake Powell and Lake Mead during the Interim Period**

Reclamation's modified operations of Lake Powell should have as an objective the protection of Lake Mead. Reducing Glen Canyon Dam downstream releases with no consideration for Lake Mead's elevation will lead to catastrophic levels in a short time-span as shown in Reclamation's Low-Flow Hydrology and Operational Scenarios. 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.

- **Section 7. Implementation of Guidelines**

Mid-year adjustments to reduced releases 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 that would result in reduced deliveries to contractors must have clear triggers and as much advanced notice to enable users to make appropriate planning and operational decisions.

- **Public Health and Safety**

Public health and safety is a priority for municipal providers, being responsible for direct delivery of water to residents, schools, businesses, hospitals, industries, manufacturers and more. When integrating public health and safety into Colorado River operational decision-making, it is critical to understand that health and safety cannot be reduced to an arbitrary allotment for minimum drinking water needs. Water is essential to all aspects of our communities.

Furthermore, public health and safety determinations for water supply to the lower basin should consider the unique elements of different communities. In the Phoenix metropolitan areas, water is crucial in combatting the hazards of the urban heat island which can have significant impacts on human health. Water is critical to sustain our desert-adapted trees and vegetation that provide cooling benefits and mitigate the urban heat island.

- **Evaporation and System Losses**

Reclamation should continue to pursue implementation of assessments on evaporation, seepage and system losses. These losses should be assessed by the contractors and factor relative location and history of use. All water users who draw upon the Colorado River enjoy the benefits of this water supply and simultaneously contribute to evaporation and system losses. Accordingly, it is reasonable and appropriate for all water users to share in the assessment of these losses.

- **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, Reclamation could consider additional actions that can be taken in the Upper Basin to contribute to the stabilization of Lake Powell. Reclamation should evaluate the impact of water use reductions in the Upper Basin as well as continued Drought Response Operations Agreement (DROA) releases to Lake Powell. The dire conditions being experienced throughout the entire Colorado River Basin, require responsible action from all users to protect the system.

Goodyear supports Reclamation's collaborative and consensus-based approach to address the crisis situation being faced on the Colorado River. Given our conservation efforts, we remain hopeful of the future of the Colorado River as we work to obtain long-term sustainable plans. We look forward to future discussions and collaboration with Reclamation and other stakeholders.

Sincerely,



Ray Diaz
Water Resources and Sustainability Manager



Lou Andersen
Interim Public Works Director