SCOTTSDALE WATER

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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

Scottsdale Water 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 the Federal Register Notice 87 FR 69042. The Colorado River represents approximately 70% of our city's supply, making it a highly vital resource for our community. Continuing to address rapidly changing conditions is imperative to provide security to our citizens.

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 updated modeling presented a clear, but grim, image – aridification in the climate is continuing to threaten the stability of the river. Scottsdale Water fully supports Reclamation's development of the SEIS and consideration of Reservoir Operations Modification Alternative. As a member, we stand with the comments made by the Arizona Municipal Water Users Association (AMWUA):

Determination of Lake Mead Operation During the Interim

It is obvious 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). 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.

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.

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.

Scottsdale 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.

Implementation of Guidelines

There is a recognition 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.

Public Health and Safety

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, 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^{o} 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.

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.

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 should 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.

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The crisis on the Colorado River necessitates not just the development of the SEIS, but swift, decisive action to stabilize the system for all water users. One without the other will result in either the continual decline of the system or unintended, damaging consequences.

Scottsdale Water appreciates the opportunity to provide input on the SEIS and looks forward to continued engagement with Reclamation.

Sincerely,

Gretchen A. Baumgardner
Water Policy Manager | City of Scottsdale