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September 1, 2022

The Honorable Tanya Trujillo

Assistant Secretary, Water & Science

U.S. Department of the Interior

Washington, D.C. 20240

Via email to CRB-info@usbr.gov

Re: Request for Input on Development of Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead Under Historically Low Reservoir Conditions

Dear Assistant Secretary Trujillo,

The City of Tempe appreciates the opportunity to comment on the Post-2026 Colorado River operations 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.

Tempe holds subcontracts and leases for Colorado River water delivery through the Central Arizona Project system. The Colorado River is a critical water supply for our community and provides resources to support Tempe's economic contributions to the greater Phoenix economy. The historically low reservoir conditions on the Colorado River have caused a large degree of uncertainty with regard to near-term access to critical water resources, and this is unacceptable.

Water providers like Tempe have worked diligently to provide reliability to our customers and the uncertainty regarding the future of Colorado River supply availability makes it extremely difficult to plan for and invest in the necessary infrastructure, alternative supplies, and conservation programs required to meet the possible reductions in supplies in the timeframe indicated during the June 14, 2022 call to action by Commissioner Touton for calendar year 2023. To ensure our long-term ability to provide water to residents and businesses, and sustain our economy, we need increased clarity and reliability with regards to the future of our Colorado River supplies. The Post-2026 operations along with clarity on any interim steps required of the basin states are critical to that outcome.

Tempe requests Reclamation's serious consideration of the responses submitted by AMWUA to Reclamation's request for feedback in the Notice as summarized below.

- **Post-2026 Operations Must Focus on Increased Clarity and Reliability for Water Users** – Municipal water providers need increased clarity from Post-2026 Operations on water supply availability across a broad range of hydrologic scenarios. The system should be managed for increased reliability (instead of maximizing diversions and releases), to provide more stability for water users reliant on Colorado River supplies. The Post-2026 Operations should seek to restore and build back up the Colorado River system reservoirs and steps must be taken to address the

Lower Basin structural deficit. This should also include defined reservoir operations at lower elevations as well as more notice regarding supply availability in upcoming years.

- **Continue to Incorporate Climate Change Impacts in Reclamation’s Modeling and Decision-making Tools-** Reclamation’s modeling tools and processes must be updated to incorporate the best available climate science, and to remove biases from past, wetter hydrology. Estimates of what constitutes a “normal” supply need to be consistent with the new reality of the aridification in the Colorado River Basin.
- **Shortage Sharing Must be Equitable and Basin-wide** -Water users throughout the Basin and Mexico should all share in the responsibility of taking shortage reductions and making efforts to protect the system.
- **Post-2026 Operations Should Provide Flexibility for Shortage Mitigation** - In light of decreased Colorado River supply availability, the Post-2026 Operations should continue to add flexibility for water management and facilitate shortage mitigation strategies such as augmentation, exchanges, and conservation.
- **Establish a Basin-wide “Municipal Sector” Committee to Facilitate Meaningful Input and Engagement from Municipal Water Providers-** The upcoming NEPA process(es) and the Post-2026 guidelines would benefit from the creation of a Basin-wide Municipal Sector Committee. This Committee should be in addition to Reclamation’s consultation with the Governor’s representatives from each Basin State.
- **Continue to Emphasize Collaboration and Consultation-** Continued collaboration and consultation with the Basin States, water users, Mexico, Tribes, NGOs, and stakeholders - including municipal water providers - throughout the Basin is crucial for a successful NEPA process and implementation of the Post-2026 Operations.

CITY OF TEMPE MUNICIPAL UTILITIES/WATER UTILITIES DIVISION



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