



**Shaping a new
tomorrow, today.**

August 31, 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,

Gilbert 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.

Gilbert holds multiple subcontracts and leases for Colorado River water delivery through the Central Arizona Project (CAP) system. The Colorado River is a critical water supply for the community making up approximately 50% of our annual water deliveries. The historically low reservoir conditions on the Colorado River has caused a large degree of uncertainty that is unacceptable to Gilbert given that our existing residents and businesses rely on the Colorado River supply.

We work hard to provide reliability to our customers and the uncertainty regarding the future of Colorado River supply availability makes it difficult to plan for and invest in the necessary infrastructure, alternative supplies, and conservation programs to overcome reductions. These efforts require a great deal of financing, time, and in many instances, Town Council approval. Our infrastructure and community cannot turn on a dime to adjust to drastic shortages and we need advanced notice in order to make the necessary adjustments to system operations and water usage. The June 14, 2022 call to action by Commissioner Touton for calendar year 2023 is much too short of notice for critical and meaningful planning to occur. 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 and clarity on any interim steps required of the basin states are critical to that outcome.

To that end Gilbert asks for 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 Should 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.

Sincerely,

A handwritten signature in cursive script that reads "Jessica L. Marlow".

Jessica Marlow, PE
Public Works Director