



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

September 1, 2022

Commissioner Camille Touton
Bureau of Reclamation
1849 C Street NW
Washington, DC 202040

Submitted electronically via 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 Commissioner Touton:

The Arizona Farm Bureau Federation represents farmers and ranchers across the state who contribute \$23.3 billion to the state's economy. Water is the lifeblood of our thriving agricultural community. Today, the drought that has persisted across the West threatens one of the most productive and diverse agricultural economies in the world. Since 2020, farmers in Central Arizona have already been struggling through the impacts of reduced Central Arizona Project water deliveries. As water levels continue to decline in Lake Powell and Lake Mead, other farming communities throughout the state who depend on the Colorado River will begin to feel the impact. Given the vital importance of water to agriculture, we appreciate the opportunity to provide the following comments in response to the Bureau of Reclamation's (BOR) request for input (ROI) on development of Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead under historically low reservoir conditions.

Arizona has stepped up consistently over the years as the impacts of the drought has worsened – not only giving up water through agreements like the Drought Contingency Plan and the 500+ Plan, but also by coming to the table with solutions. Our State and our farmers have invested millions of dollars in Central Arizona to develop water-saving technology and infrastructure to alleviate the impacts of Colorado River shortages. In addition, farmers and irrigation districts in the Yuma growing region have come to the table with a reasonable and practical approach, now known as the "Save the River Plan," to temporarily reduce valuable production in order to leave more water in the river. Supporting these efforts formally and financially is imperative considering the level of food production generated by farmers in the Yuma valley. The U.S. and the rest of the world cannot afford to let this agricultural stronghold vanish due to drought. In the near-term, we strongly urge BOR to use funds allocated through the Inflation Reduction Act to support these efforts to create the storage necessary to avoid a crash on the river.

The potential for continued drought and further pressure on the Colorado River system is reflected in data provided in the recent Colorado River Basin August 2022 24-Month Study. Even if the Basin receives higher than expected inflows in the near term, the Colorado River system is overallocated and does not take into account the structural deficit created by system evaporation. It is important that as BOR develop the Post-2026 Operational Strategies, they work with stakeholders to determine river allocations that are consistent with current average system in-flows. It is challenging to make long-term plans in a water system that is over allocated, and even more difficult when the system is faced with drought conditions.

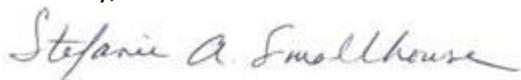
The ROI specifically requested input on the process that can be employed to encourage and facilitate meaningful participation of all Colorado River Basin partners, stakeholders, and the general public. During the planning process to develop the 2007 Interim Guidelines, agricultural stakeholders were not included in a substantive way. This was largely rectified in the development of the Lower Basin Drought Contingency Plan. Arizona extended this stakeholder engagement with the establishment of the Arizona Reconsultation Committee, which has been proactive in the preparations for discussion regarding post-2026 operations. Arizona has repeatedly proven its willingness to be part of the solution for the entire system, predominantly at the sacrifice of food and fiber production. Today, the BOR has an opportunity to lead in its role as water manager and bring all stakeholders to the table to share equitably in the pain caused by this historic drought. For that reason, all stakeholders must have a seat at the table, including agriculture. As the Post-2026 Operational Strategies are developed, those who use the water must be given a meaningful opportunity to participate in the decision-making process. Furthermore, any decisions about use of the river must recognize the economic significance of agriculture dependent on Colorado River water – it extends beyond the scope of farms and rural communities to include safeguarding our domestic food security.

Other elements that should be considered by BOR in the upcoming NEPA process include further encouraging conservation and efficiency measures by all users, augmenting water supplies where feasible, and evaluating increased storage capacity to capture seasonal precipitation in sub-watersheds likely to be impacted by the reverberating impacts of less water in the Colorado River system. Furthermore, the NEPA process needs to include specific analysis to streamline upper watershed projects, intended to improve forest and rangeland health, across multiple federal agencies. Each of these elements is an important component to the overall health and resilience of the Colorado River Basin.

Water is fundamental to agricultural production, which is fundamental to our domestic food supply, which is fundamental to our way of life and national security. It is incumbent upon BOR to work with all users of the Colorado River in being aggressive, innovative, and sacrificial to protect the river and the people, industries, and communities who rely on it as it begins to develop its Post-2026 Colorado River Operational Strategies.

Thank you for your consideration.

Sincerely,



Stefanie Smallhouse, President
Arizona Farm Bureau Federation