



9379 E San Salvador Drive
Scottsdale, AZ 85258

Phone: 480-312-5685
ScottsdaleAZ.gov/Water

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 Scottsdale 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.

The City of Scottsdale holds multiple entitlements and leases for Colorado River water delivery through the Central Arizona Project (CAP) system. The Colorado River is a critical water supply for residents, businesses, and our economy. Colorado River makes up approximately 70% of our annual water deliveries. While the city has been investing in infrastructure projects, additional supplies, and a strong conservation program to build resiliency, uncertainty in the future of the Colorado River is beyond problematic.

The Central Arizona Project was approved with the caveat of a strong governance program around groundwater management. Over the last four decades we have made every effort and invested in hundreds of millions of dollars to reduce our groundwater use to the bare minimum, while utilizing reclaimed water to 100% beneficial use. We have invested millions of dollars in decades worth of conservation programs. Responsibly using our water resources is a part of our desert city. This is why it's disheartening and frustrating that the Federal Government has yet to act, has yet to address what the future of the west needs. Scottsdale asks for Reclamation's serious consideration of the responses submitted by AMWUA to Reclamation's request for feedback in the Notice as summarized below.

"These dismal circumstances have worsened in recent years as reflected in Reclamation Commissioner Touton's June 14, 2022 remarks which emphasized that emergency actions are necessary to prevent extraordinary risks and the decline of Lakes Mead and Powell to critical elevations. This degree of uncertainty is unacceptable to municipal water providers who rely on Colorado River supplies to serve their residents and support the major population centers of the American West. Cities cannot follow neighborhoods. Municipalities must make decisions that impact millions of residents and key industries, and those decisions require stability and



9379 E San Salvador Drive
Scottsdale, AZ 85258

Phone: 480-312-5685
ScottsdaleAZ.gov/Water

predictability of how much water will be available into the future.” We ask that the following points be address in the Post-2026 Operations:

- 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 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.
- 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Gretchen A. Baumgardner", written over a horizontal line.

Gretchen A. Baumgardner

Water Policy Manager | City of Scottsdale