

September 8, 2022

The Honorable Tanya Trujillo
Assistant Secretary, Water & Science
U.S. Department of the Interior
1849 C Street, NW
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 Avondale appreciates the opportunity to comment on the Post-2026 Colorado River operations, and we submit 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 Avondale holds a subcontract for Colorado River water delivery through the Central Arizona Project (CAP) system. The Colorado River is a critical water supply for our community, comprising approximately thirty percent of our renewable supplies. We serve residents, businesses, schools, healthcare facilities, and industrial customers, vital to providing jobs, housing, health benefits, and more, while contributing to the local, regional, and national economies. The historically low reservoir conditions on the Colorado River System have caused a large degree of uncertainty of near-term access to critical water resources that we find unacceptable.

Avondale has worked diligently to provide water reliability to our customers and community, and the uncertainty of the future Colorado River supply availability creates additional challenges for water providers to adequately plan and invest in necessary infrastructure, alternative supplies, and conservation programs to overcome system reductions in the timeframe indicated by Commissioner Touton's June 14, 2022 call to action for 2023. These efforts require considerable time, financing, planning, and often, City Council approval. To ensure our long-term ability to continue to provide water to our community and sustain our economy, we need increased clarity and reliability concerning 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.

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

- **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. BOR ought to manage the system 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 increase 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** – Update BOR’s modeling tools and processes 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 ought to 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.

Avondale recognizes the complexity of the Colorado River System situation, as well as the sheer number of stakeholders and moving parts involved in finding resolutions. We are hopeful for continued collaboration and cooperation among the Colorado River System users, as well as with the BOR, and appreciate BOR’s consideration of these comments.

Best,


Jennifer Davidson, CWEP
Water Resources Manager


Kirk L. Beaty, P.E.
Public Works Director