



September 1, 2022

The Honorable Tanya Trujillo
Assistant Secretary, Water & Science
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Via email to CRB-info@usbr.gov

RE: Response of the City of Chandler to the Bureau of Reclamation’s “Request for Input on the 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 Chandler appreciates the opportunity to respond to the Bureau of Reclamation’s request for input on the development of Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead. Thank you for soliciting input and providing an opportunity to comment on both the process of stakeholder engagement and the substantive elements being considered in the upcoming NEPA process.

Chandler is the fourth largest city in Arizona and widely known as a Community of Innovation. Chandler businesses are global industry leaders in high-tech manufacturing, business and financial services, aviation and aerospace, healthcare and bioscience and information technology. The economic impact of our business community represents a significant portion of Arizona’s total GDP, and an important contribution to the national GDP. Last year, Intel announced a \$20 billion expansion of its Chandler Ocotillo campus. The Ocotillo campus is Intel’s largest, most advanced manufacturing site in the world and the largest private investment in Arizona history. Companies like Intel choose to locate in Chandler because we have a long history of smart water management, proactive infrastructure investments and a demonstrated commitment to water reuse and conservation.

Mailing Address

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P.O. Box 4008
Chandler, AZ 85244-4008

Public Works & Utilities

Utilities Administration
480-782-3800
480-782-3805 Fax
chandleraz.gov

Location

975 E. Armstrong Way
Building L
Chandler, AZ 85286

The City of Chandler has played an important role in conserving Colorado River water. Chandler has invested roughly \$1.75 billion in our water and wastewater treatment and distribution systems. We own and operate three water reclamation facilities and reuse 100% of our treated wastewater. Chandler and its partners have invested in water efficiency improvements and developed conservation programs to encourage long-term reductions in water use. We offer incentive programs to replace grass with desert adapted landscaping and provide extensive conservation education opportunities for our community. Over the past 25 years, Chandler's average residential water use has decreased by 20%.

The City of Chandler depends on the Colorado River for approximately 37% of our annual water supply. Recent Colorado River conditions pose extreme challenges for all municipal water providers who rely on the River, both now and into the future. While the Basin States struggle to reach consensus on how to manage the future reductions necessary to protect the system, water users are left with an unacceptable degree of uncertainty. Municipal water providers are responsible for ensuring a sustainable water supply for our residents and businesses, and our long-term planning decisions require stability and predictability of supply into the future.

Chandler believes that the next set of guiding principles and future operating strategies must improve the stability of the entire Colorado River system. In considering Post-2026 operating strategies, we should prioritize system reliability over maximizing annual releases.

We recommend the following actions:

1. Establish a Basin-wide "Municipal Sector" Committee to facilitate meaningful input and engagement from municipal water providers who depend on the Colorado River. We respect the existing Basin States negotiating framework and the importance of Reclamation's consultation with the Governor's representatives. However, there is currently no mechanism or process in place to solicit input specifically from municipal water providers. Municipal water providers offer a unique and critical perspective and should be included in the conversation.
2. Establish a transparent process to meaningfully engage all stakeholders. Collaboration and consultation with all water users, including Mexico, Tribes, NGOs, municipal providers and agriculture, is critical to ensure the success of the Post-2026 Operating Strategies.
3. Establish equitable shortage sharing criteria. All water users, from all sectors and across the Basin, should share in the responsibility to protect the system.
4. Invest in water reuse programs and agricultural efficiency improvements.
5. Incentivize conversion to lower water-use crops.
6. Charge each contractor for evaporation and losses in the Lower Basin.

7. Implement the necessary Glen Canyon Dam modifications that will increase reliability of releases under low reservoir conditions.
8. Maximize the effectiveness of the drought mitigation efforts included in the Inflation Reduction Act by prioritizing funding for projects that demonstrate long-term and permanent reductions in consumptive use. These funds should not be used to provide an annual subsidy to compensate water users who temporarily leave water in the system.

Arizona's municipalities have been key partners in the management of supply reductions in the past, and we stand ready to engage at that level once again. When reviewing our recommendations, please keep in mind the importance of municipal water providers, the need for reliability and stability of municipal supplies, and the serious economic consequences that water insecurity in the West presents for our nation.

Sincerely,



Simone Kjolsrud
Water Resource Advisor
Public Works & Utilities Department
City of Chandler

cc: Joshua Wright, City Manager, City of Chandler
Andy Bass, Deputy City Manager, City of Chandler
John Knudson, Public Works and Utilities Director