



March 2, 2026

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
Washington, D.C. 20240

Through:
United States Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, Nevada 89006

Via email to CRBpost2026@usbr.gov

RE: Comments of the City of Chandler, Arizona to the Bureau of Reclamation's Draft Environmental Impact Statement for the Post-2026 Colorado River Operational Guidelines and Strategies for Lake Powell and Lake Mead

Secretary Burgum,

The City of Chandler submits the following comments to the Bureau of Reclamation's Draft Environmental Impact Statement (DEIS) for the Post-2026 Colorado River Operational Guidelines and Strategies for Lake Powell and Lake Mead, published in the Federal Register by the Bureau of Reclamation on January 16, 2026, at 91 Fed. Reg. 2131. Chandler joins in the comments filed in this matter by Central Arizona Water Conservation District (CAWCD), the Arizona Department of Water Resources (ADWR) and the Arizona Municipal Water Users Association (AMWUA). Chandler offers the following additional comments.

Chandler, Arizona is widely known as a Community of Innovation and the fourth largest city in Arizona, with a population of more than 292,000. Chandler businesses are global industry leaders in semiconductor manufacturing, high-tech manufacturing, aviation and aerospace, bioscience and information technology. Chandler is the home of industries that are critical to our national economy and our national defense. Intel, Chandler's largest employer with approximately 9,000 employees, has been operating in Chandler for over 45 years, with manufacturing starting in 1979 and the first assembly test plant in 1985.

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Economic Impact of Chandler's Semiconductor Industry

The total economic impact of Chandler's business community represents a significant portion of Arizona's total GDP, and an important contribution to the national GDP. Intel alone contributes an annual estimated \$10.7 billion to Arizona's economy. Given Intel's legacy in Chandler, the State has become a premier global hub for semiconductor manufacturing and advanced packaging and research, resulting in an ecosystem that supports numerous industries including the defense industry. Chandler's semiconductor manufacturers include Intel, NXP, Microchip Technology and more. We are also home to AI data centers and many companies in the aviation and aerospace industries such as Northrop Grumman. These businesses rely on Chandler to provide a safe, reliable and secure water supply.

Intel has invested more than \$35 billion in capital in Arizona and recently completed a \$32 billion factory expansion of the Chandler Ocotillo campus. Intel's foundry in Chandler is the only foundry doing leading edge process research, development and manufacturing in the United States. Intel has invested in two sites in Chandler. The Chandler Ocotillo campus is Intel's largest manufacturing site and focuses on wafer fabrication. The other Chandler campus is their assembly/test facility. Arizona is home to the most advanced and most extensive semiconductor industry in the United States, an industry that is foundational for military modernization, intelligence efforts, and critical infrastructure.

These companies site their businesses in Chandler because we have a long history of smart water management, proactive infrastructure investments and have demonstrated a commitment to sustainable water management, reuse and conservation.

Chandler's Commitment to Water Reuse

The City of Chandler is widely recognized for our innovation in water policy and our infrastructure investments that help conserve Colorado River water. Chandler was the first city in the nation to adopt a large water user ordinance to assist the city in maintaining a sustainable water supply for all existing and future water users. The city has invested roughly \$1.75 billion in our water and wastewater treatment and distribution systems. We own and operate two drinking water treatment plants and three water reclamation facilities. Chandler has achieved 100% reuse of our treated wastewater and delivers 30,000 Acre Feet per Year (AFY) of reclaimed water for irrigation and industrial purposes.

Intel's Chandler Ocotillo campus has achieved the prestigious platinum-level certification from the Alliance for Water Stewardship, the highest level of recognition for sustainable water management. They have demonstrated a commitment to water reuse by constructing their own private on-site water reclamation facility, which recovers 98% of the industrial wastewater sent to

that facility for internal reuse. Intel also partnered with Chandler to fund the construction and ongoing operating expense of the Ocotillo Brine Reduction Facility, a wastewater treatment facility that processes Intel's process water that is too salty to discharge to the sewer system. This facility recovers 96% of that water which is sent back to Intel for reuse. The partnership between Chandler and Intel has been recognized as a model for public private partnership and an example of water reuse innovation. Intel has invested over \$1 billion in water treatment and reclamation.

Chandler's Commitment to Water Conservation

Chandler and its partners have invested in water efficiency improvements and developed conservation programs to encourage long-term reductions in outdoor water use. We offer incentive programs to replace grass with low-water-use landscaping and provide extensive conservation education opportunities for our community. Over the past two years, nearly five hundred Chandler water customers utilized our rebate programs to reduce outdoor water use and Chandler issued over \$1.2 million in rebates for landscape conversions and irrigation efficiency technology. In just two short years, these rebate programs have resulted in the removal of more than 500,000 square feet of grass. Over the past 25 years, Chandler's average residential water use has decreased by 20%.

Chandler has demonstrated a commitment to remove non-functional grass from city-owned property. In 2025, Chandler removed over 1 million square feet of grass and converted landscapes to xeriscape. The city has also developed an on-going capital improvement program to continue funding turf-to-xeriscape conversions on city property with an additional 1.3 million square feet of grass to be removed next year.

Chandler Water Rights and Contracts

Our community depends on the Colorado River for approximately 37% of our annual water supply. Chandler receives water through the Central Arizona Project (CAP). In addition to our CAP subcontracts, we also lease CAP water from several tribal partners. In addition, pursuant to the Salt River Pima-Maricopa Indian Community Water Rights Settlement Agreement, Chandler has a Colorado River water right that pre-dates September 30, 1968. Chandler contributes reclaimed water to the Gila River Indian Community, through an exchange for Colorado River water, agreed to as part of the 2004 Arizona Water Settlements Act. Chandler's twenty-year partnership with the Gila River Indian Community allows us to deliver more than 20,000 AFY of Class A+ reclaimed water to the Community for agricultural uses.

Recent Colorado River hydrologic conditions pose extreme challenges for all municipal water providers who rely on the River, both now and into the future. The DEIS fails to analyze the socio-economic consequences of reducing or eliminating our Colorado River supplies. Chandler and

other CAP Municipal & Industrial Subcontractors rely on the CAP water delivered to our water treatment plants to meet our customer demands. Shortage reductions in the range of 57% to 100%, as proposed by the DEIS Alternatives, would devastate the central Arizona economy. This water is critically important to our ability to serve our customers, continue to support our thriving community and keep our economy strong.

Environmental & Infrastructure Damage

Reductions of this magnitude would force Chandler to pump groundwater unsustainably and many of our neighboring communities would be forced to do the same. The aquifer we have carefully managed over the past forty-five years would immediately experience rapid drawdown. The failure of this DEIS to analyze the severe environmental damage to the aquifer, the related subsidence and the damage to infrastructure in central Arizona is unacceptable.

Recommendations & Conclusions

We respectfully request the Department of Interior withdraw the document and instead implement a decision that is consistent with the Colorado River Compact of 1922. This DEIS document is highly likely to lead to legal challenges and long-term environmental damage that has not been analyzed.

As required by law, the Post-2026 Operational Guidelines and Strategies must adhere to the Law of the River, include Colorado River Compact Compliance, demonstrate equitable shortage sharing between the Upper Basin and Lower Basin, acknowledge and protect the U.S. trust responsibilities to Tribes and properly consider environmental consequences.

The decision implemented should include the following elements:

1. An analysis of the reasonably foreseeable condition that flows at Lee Ferry will drop below the requirement under the Colorado River Compact and the Lower Basin States will call for Compact deliveries, curtailment in the Upper Basin, and that additional releases from the Colorado River Storage Project Act (CRSPA) Upper Initial Units (UIUs) may be necessary. The DEIS ignores that the Lower Basin States can and will seek enforcement of the Compact should the Upper Basin fail to comply with its obligations.
2. The Colorado River Basin Project Act demonstrates that the CRSP UIUs were intended, constructed and permitted to store water for delivery to the Lower Basin. None of the DEIS Alternative even consider allowing for the possibility of substantial releases from the UIUs for the purpose of satisfying requirements of the Colorado River Compact.
3. Incorporate any future Lower Basin States proposal for a consensus agreement to manage 1.5 MAF of reductions in the Lower Basin made prior to publication of the Final EIS.

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4. There are 22 federally recognized Tribes in Arizona. Each of the DEIS Alternatives impose draconian reductions on Tribes in Arizona reliant on CAP water. These shortages will not only impact the Tribes themselves but also affect numerous cities and towns that lease water as part of tribal settlements. The U.S. must acknowledge and honor commitments in tribal settlements.
5. In exercising its discretion and protecting critical reservoir elevations, the U.S. should consider and protect its trust responsibility and obligations to Tribes in the Lower Basin. The Tribes agreed to settle their water rights based on the expectation they could trust the U.S. to enforce Colorado River Compact Compliance and implement the Long-Range Operating Criteria. The DEIS fails to explain how it will protect this water.
6. Analyze the impact of implementing the necessary Glen Canyon Dam modifications to increase reliability of releases under low reservoir conditions. The DEIS fails to analyze any engineering solutions that would protect critical infrastructure while maintaining access to millions of AF of water in Lake Powell. Excluding engineering solutions has effectively stranded 3.74 million AF, further limiting Reclamation's ability to ensure the Compact's delivery requirements are satisfied.

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 Resources Manager



Jeremy Abbott, Public Works & Utilities Director

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