



February 26, 2026

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

Via email to [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

**Re: Request for Comment on Draft Environmental Impact Statement on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – 91 FR 2131**

To Whom It May Concern:

On behalf of the City of Glendale, Arizona, I am submitting these comments regarding the Draft Environmental Impact Statement (DEIS) for Post-2026 operations. Glendale is a major urban center with a 2026 population estimated at 262,745 residents, growing steadily at nearly 1% annually. As one of the top 100 largest cities in the nation, our reliance on the Colorado River is not merely a matter of policy but a requirement for the survival of our community and local economy.

While Arizona's population has increased since the 1980 passage of the state's Groundwater Management Act, total statewide water use has remarkably decreased by approximately 16%. The Central Arizona Project (CAP), which delivers Colorado River water, is currently subject to a 30% reduction in normal supply due to the Tier 1 shortage applicable to the Lower Basin states.

Glendale is a primary stakeholder in the CAP system which provides approximately 40% of Glendale's annual water supply. Because the DEIS options concentrate basin-wide reductions on the CAP, Glendale faces supply cuts ranging from 32% to 98%. This creates an unacceptable risk for Glendale and the \$100 billion regional economy. While the City offsets potable demand by utilizing reclaimed water for 6% of its needs, these conservation efforts cannot withstand federal mandates that impose draconian cuts on Arizona while exempting the Upper Basin from its delivery obligations. The DEIS threatens the City's 100-year Assured Water Supply designation and fails to analyze the catastrophic local impacts of the proposed alternatives on Glendale's economic and environmental landscape.

## **I. The DEIS Fails to Present a Lawful and Balanced Range of Alternatives**

The DEIS avoids analyzing conservation activities above Lake Powell, claiming a lack of authority to compel action from Upper Basin water users. The Lower Basin States' proposed alternative was based on the total water volume across seven major reservoirs (total system contents) and implementing a static 1.5 MAF reduction in the Lower Basin;

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however, Reclamation did not include this comprehensive approach as a distinct, implementable alternative in the DEIS.

Instead, Post-2026 DEIS alternatives disproportionately burden the Lower Basin, an approach inconsistent with current reservoir storage conditions. Furthermore, the DEIS overlooks a foundational principle: Upper Basin Colorado River Storage Project (CRSP) units were designed to store water for delivery to the Lower Basin to fulfill Compact obligations, not simply to maintain power infrastructure at Glen Canyon Dam.

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## II. The DEIS Disregards Economic and National Security Impacts

The proposed alternatives ignore the severe socioeconomic consequences of cutting water supplies to one of the nation's premier global hubs for advanced technology and manufacturing. The DEIS assumes continued water demand growth in the Upper Basin while simultaneously proposing severe shortages for the Lower Basin that would cripple local industries such as:

- **Aerospace & Defense:** Glendale is a premier hub for this sector, anchored by Luke Air Force Base (home to the world's largest fighter wing) and major private employers like Honeywell and Corning.
- **Healthcare & Bioscience:** We host major Arizona hospital systems, including Banner Health, Dignity Health, and Abrazo, alongside the Phoenix Children's Hospital Arrowhead Campus, a \$195 million investment designed to treat 72,000 patients annually.
- **Advanced Manufacturing:** With over 100 manufacturers, including facilities for Kroger and major logistics hubs, Glendale's industrial sector drives the regional economy.
- **Sports and Entertainment District:** State Farm Stadium (home of the Arizona Cardinals) and Desert Diamond Arena host major national events and generate hundreds of millions of dollars in annual economic activity.

Any interruption to Glendale's water supply represents a direct threat to these high-value sectors, risking billions in capital investment and thousands of local jobs. Furthermore, the city's water settlements with Tribal nations—who also face severe cuts under the alternatives proposed by the DEIS—are essential to Glendale's long-term planning. Reductions in these supplies would jeopardize the City's ability to meet its basic contractual and municipal obligations.

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## III. The DEIS Neglects Local Environmental and Infrastructure Risks

The DEIS fails to account for the physical and environmental damage that will occur in Glendale if Colorado River deliveries are curtailed. Specifically, the analysis overlooks how reduced surface water flows will force an immediate and unsustainable reliance on groundwater pumping.



- **Groundwater & Contamination:** For decades, CAP water has been the primary tool for stabilizing groundwater levels in Glendale and preventing historic overdraft. A reduction in this supply forces a return to groundwater pumping, which risks land subsidence, fissuring, aquifer compaction and the migration of known contamination plumes in the West Valley and West Central Phoenix areas.
- **Water Quality & Treatment Costs:** Shifting to deeper groundwater may have higher levels of contaminants like arsenic. Mitigating these risks would require Glendale to invest hundreds of millions of dollars in new treatment infrastructure, placed directly on the backs of local ratepayers.

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## Conclusion

Glendale faces serious risk from Post-2026 Operating Guidelines that place a significant burden of Colorado River reductions on Arizona's CAP supply. We urge the Bureau of Reclamation to distribute water shortages across all basin states to protect the socio-economic stability of desert cities like Glendale.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Patrick Banger'.

Patrick Banger  
City Manager  
City of Glendale, Arizona