



March 2, 2026

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

Via email to 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

The City of Goodyear (Goodyear) appreciates the opportunity to respond to the U.S. Bureau of Reclamation's (Reclamation) request for comments on the Draft Environmental Impact Statement (DEIS) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, published in Federal Register Notice 91 Fed. Reg. 2131 (January 16, 2026).

Goodyear is located in the southwestern part of the Phoenix metropolitan area and is home to over 140,000 residents. Goodyear has evolved from its agricultural roots into a vibrant suburban city with a thriving economy supported by diverse industries. The water Goodyear receives from the Colorado River represents a vital resource, sustaining the city's residents, businesses, and industries and supporting its continued growth and prosperity. The proposed Draft Environmental Impact Statement (DEIS), however, threatens this essential resource and, by extension, the well-being and economic stability of our city.

Goodyear supports a collaborative interstate and international agreement—developed in partnership with Tribal sovereigns—as the foundation for post-2026 operations of Lake Powell and Lake Mead. Whether or not the Basin States offer a consensus alternative, we urge Reclamation to evaluate additional pathways beyond those analyzed in the DEIS. The alternatives currently considered—and Reclamation's associated analysis—are insufficient and pose unacceptably high levels of risk to the City of Goodyear and the state of Arizona for the following reasons.

I. The DEIS fails to consider the substantial economic and national security impacts that would result as a consequence of the severe shortages proposed under each Alternative

Each of the five Alternatives presented in the DEIS would lead to severe water shortages to Arizona's Colorado River supply. Millions of Arizonans, including the City of Goodyear residents, rely on Colorado River water delivered through the Central Arizona Project (CAP) for drinking water. The DEIS fails to adequately analyze the socioeconomic impacts of severe shortage reductions to communities in Arizona.

The alternatives analyzed in the DEIS as presented would pose significant economic challenges to the City of Goodyear by potentially imposing deeper, disproportionate water reductions on Central Arizona. These mandates would likely force the City to accelerate costly capital investments in alternative water supplies and advanced treatment technologies, placing upward pressure on municipal utility rates for residents and businesses. Furthermore, such supply uncertainty could hinder long-term economic development and industrial growth, as a stable and predictable water allocation is the primary requirement for sustaining Goodyear's diverse and expanding economy. Regionally, the economic impacts of any of the

considered reductions to CAP under the EIS alternatives will have enormous negative consequences for the national economy. Arizona stands as a premier global hub for some of the world's most advanced technology and manufacturing industries, fueled by significant investments in semiconductors, aerospace, and defense. The DEIS fails to adequately analyze the socioeconomic impacts of severe shortage reductions to these industries and ignores the potential negative impacts on national security.

The National Environmental Policy Act (NEPA) requires federal agencies, including Reclamation, to evaluate the reasonably foreseeable environmental effects of proposed federal action. Under 40 C.F.R. § 1508.1(g)(4), "effects" are defined broadly to include aesthetic, historic, cultural, economic, social, and public health impacts on affected communities. Accordingly, NEPA requires Reclamation to fully analyze the reasonably foreseeable impacts of proposed water reductions on Arizona cities, including the economic consequences, effects on municipal services and growth, public health implications, and broader social and community impacts associated with reduced water supplies.

II. The DEIS fails to account for the environmental effects of potential CAP cuts under any of the proposed alternatives.

Reclamation has an obligation to evaluate the reasonably foreseeable environmental impacts of its proposed alternatives. However, the current analysis fails to meaningfully examine many of the critical consequences associated with the proposed alternatives in Arizona.

The DEIS does not fully account for cumulative impacts to already stressed water systems. If Colorado River water deliveries from CAP are significantly reduced, water providers will be forced to increase groundwater pumping. This shift is not a neutral substitute. Increased groundwater extraction threatens to accelerate aquifer depletion, drive land subsidence, degrade water quality, and impose significant long-term costs on communities and infrastructure. At the same time, reduced river flows will create drier environmental conditions across affected areas. These drying conditions can contribute to increased dust generation and higher concentrations of particulate matter, exacerbating regional air quality challenges and posing additional public health risks. These concerns are particularly acute in the Phoenix metropolitan area, which already struggles with nonattainment for airborne particulate matter 10 microns or less in diameter (PM-10).

Further, the DEIS fails to analyze wildlife impacts or impacts on access to shade. In the Phoenix metropolitan area, water is essential for sustaining our desert-adapted trees and vegetation, which provide cooling benefits and help mitigate the urban heat island effect. These trees also serve as vital habitats for a diverse array of wildlife. If cities are forced to cut landscape watering due to reduced CAP deliveries, many of these trees will die and will have adverse impacts on animals and human health.

III. Reclamation misinterprets the scope of its authority in the Law of the River

Reclamation's analysis reflects an unduly narrow interpretation of its authority under the "Law of the River." That body of law – including the Colorado River Compact, and related contracts, court decrees, and operating guidelines – defines both the limits and obligation governing the management of Colorado River Water.

Reclamation insists it lacks authority to impose water use reductions on the Upper Basin States. That position, however, ignores the extent of Reclamation's operational authority over federally controlled reservoirs and releases. By construing its discretion in a manner that overlooks or minimizes these governing authorities, Reclamation fails to account for the full

legal framework within which it must operate. Any proposed action must be consistent with compact allocations, statutory directives, and binding agreements among the Basin States. An interpretation that expands or contracts its authority beyond what these instruments authorize is inconsistent with the Law of the River and renders the analysis flawed.

IV. The DEIS fails to implement the Secretary's authority to release water from the CRSP Units leading to inequitable distribution of shortage reductions across both the Upper Basin and Lower Basin

No alternative analyzed in the DEIS proposes any mandatory reductions to the Upper Basin and rather imposes the entirety of required cuts to the Lower Basin, and in particular CAP. The rationale for this approach is that Reclamation lacks authority to impose mandatory reductions on the Upper Basin or require specific deliveries from the Upper Basin and that the federally constructed storage in the Upper Basin is solely for the benefit of the Upper Basin. This rationale is incorrect.

The Colorado River Storage Project (CRSP) Act of 1956 authorized the construction and operation of storage units in the Upper Basin. Its central purpose was to allow the Upper Basin states to capture and store water in high-flow years so they could reliably meet their delivery obligations to the Lower Basin at Lees Ferry under the Colorado River Compact. Reclamation has the authority to operate this federal infrastructure to ensure compliance with the compact. The DEIS fails to consider the operation of the CRSP storage units consistent with delivery obligation under the Compact or how it might use that authority to equitably spread shortage obligations across both basins.

The DEIS fails to contemplate any water use reductions in the Upper Basin, and in fact assumes that the Upper Basin water use will increase. The effects of the proposed alternatives will thus fall disproportionately on the Lower Basin. As described above, the United States must ensure that the Upper Basin States are meeting their 1922 Compact delivery obligations (including through a Compact call and curtailment, if necessary) before disproportionately reducing Lower Basin use.

V. The DEIS fails to present any Alternative that adheres to the Colorado River Compact, in direct contravention of federal law requiring the Bureau of Reclamation to implement the Colorado River Compact.

The Colorado River Compact mandates that the Upper Basin has an obligation to deliver at least 82.5 million acre-feet of Colorado River water to the Lower Basin in any 10-year period.¹ Section 601 of the Colorado River Basin Project Act (CRBPA) mandates that the United States shall implement the Colorado River Compact.

The DEIS fails to include any consideration of the possibility of a Compact violation by the Upper Basin. Each of the five proposed Alternatives presented in the DEIS wrongly assumes that the Upper Basin states have no duty to comply with their delivery obligations and would make no meaningful reductions in usage and therefore requires the Lower Basin States to accept disproportionate and inequitable reductions that contravene the Lower Basin's rights under the Compact and the Law of the River. The Draft EIS also ignores that the Lower Basin States can and will seek enforcement of the Compact should the Upper Basin fail to comply with its obligations. The lack of consideration of compact compliance is unacceptable and renders the DEIS procedurally flawed, and incapable of supporting informed decision-making.

VI. The Draft EIS should acknowledge and protect the United States' trust responsibility to Tribes, particularly those with settlements that include CAP water.

While the Secretary of the Interior is the "water master" in the Lower Basin, responsible for apportioning water among the states during shortage conditions, the Secretary also holds substantial trust responsibilities to Tribal Nations throughout the Colorado River Basin. Of the 30 federally recognized Tribes in the Basin, 22 are in Arizona. Four of those Tribes have confirmed mainstem Colorado River entitlements pursuant to *Arizona v. California*, and 11 hold entitlements to water delivered through the Central Arizona Project.

All five alternatives in the DEIS impose draconian reductions on Tribes in Arizona reliant on CAP water. These shortages will not only affect the Tribes themselves, but also numerous Arizona cities and towns that lease water from the Tribes as part of those water settlements, including the City of Goodyear.

Conclusion

In summary, the DEIS contains serious legal deficiencies and does not satisfy the procedural and substantive requirements of NEPA. The alternatives analyzed ignore established law and fail to evaluate the potential catastrophic impacts of Colorado River shortage on the cities in Central Arizona.

Reclamation bears a significant responsibility to ensure that its decisions are balanced, transparent, and grounded in sound science and law. The management of this critical interstate and international waterway has far-reaching implications for municipalities, industries, agriculture, and millions of residents who depend upon its reliability. Accordingly, the City respectfully urges Reclamation to fully consider the direct and indirect impacts of its proposed actions and to exercise its authority in a manner that safeguards existing water supplies and promotes long-term regional stability.

The City of Goodyear appreciates the opportunity to provide input on the DEIS and looks forward to continued engagement with Reclamation to promote collaborative solutions that protect our critical water resources, support regional stability, and ensure the long-term sustainability and prosperity of all who rely on the Colorado River.

Sincerely,



Barbara Chappell
Water Services Director