

# MOHAVE COUNTY WATER AUTHORITY

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March 2, 2026

Via E-Mail: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Via U.S. Mail:

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

Re: Comments on Draft Environmental Impact Statement  
for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead  
(EIS Number 20250184)

Dear Commissioner Cameron,

Mohave County Water Authority (“MCWA”) is a statutorily created member organization whose seven members, Mohave County, Kingman, Bullhead City, Lake Havasu City, Mohave Water Conservation District, Golden Shores Water Conservation District, and Mohave Valley Irrigation and Drainage District are governmental entities. Five MCWA members hold Section 5 Colorado River water entitlement contracts for 4<sup>th</sup> priority water (“Mainstem users”)<sup>1</sup>. MCWA appreciates the opportunity to comment on the Draft Environmental Impact Statement for Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (“DEIS”) and submits this letter for that purpose. These comments are made from the perspective of Mohave County Mainstem users.

The actions currently contemplated by the Bureau of Reclamation (“Reclamation”) is the adoption of specific guidelines and coordinated reservoir management strategies to address operation of Lake Powell and Lake Mead through their full operating ranges. See, DEIS at page 1-4. This contemplated action constitutes a major federal action invoking the provisions of the National Environmental Policy Act (“NEPA”) requiring the preparation of an environmental impact statement to evaluate the effects of the federal action on the human environment.<sup>2</sup>

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<sup>1</sup> Fourth Priority Mainstem users are referred to as 4P(ii) users throughout the DEIS.

<sup>2</sup> 42 U.S.C. 4336(b)(1)

The DEIS undertakes a monumental task to evaluate the impacts of the proposed actions on the Lower Division states. The primary geographic scope analyzed in the DEIS is the river corridor itself from full pool at Gypsum Canyon in Lake Powell to the Southern International Boundary, and in particular Lake Powell, Lake Mead, and the Grand Canyon. The effects to areas receiving deliveries of Colorado River water remote from the river corridor are not analyzed. The effects to areas receiving deliveries of Colorado River water within the river corridor are not meaningfully evaluated and analyzed.

The river corridor communities of Lake Havasu City, Golden Shores, Fort Mohave, Mohave Valley<sup>3</sup>, and Bullhead City are river dependent communities. The river is the life blood of these communities, providing a sense of place, a sense of identity, and a base for a tourism-based economy. Water dependent recreation on the river and lakes as well as competitive sports comprise a major portion of the economies of these river corridor communities. Agricultural production remains a part of Mohave Valley Irrigation and Drainage District's economic base, even if at a reduced level due to participation in conservation programs.

As a part of the NEPA process, the federal government must articulate a purpose and need for the federal action. Several reasons are provided in the DEIS to explain the need for federal action. These reasons include the Secretary of the Interior's obligation to coordinate operations of Colorado River Reservoirs, the expiration of the 2007 Guidelines, an ongoing imbalance between supply and demand, and the need for new and innovative conservation, among other articulated reasons. (See DEIS page 1-6) The purpose of the federal action is to update and expand management guidelines for the Colorado River reservoirs, *particularly* for the coordinated operation of Lake Powell and Lake Mead among other articulated purposes.

This stated need and purpose for federal action benefits the entire Colorado River Basin yet imposes the burden to accomplish these goals only on the Lower Basin, and Arizona in particular. Reclamation, in its efforts to operate the system to protect the infrastructure at Glen Canyon Dam and insulate the Upper Division states from their Colorado River Compact of 1922 ("Compact") delivery requirements, may create an operational shortage independent of flow quantities potentially forcing Arizona to accept reductions in deliveries more appropriately shared by all seven basin states. This inequitable allocation of burden will irreversibly harm Arizona.

#### 1. Alternatives.

The DEIS considers five alternatives: 1) No Action Alternative; 2) Basic Coordination Alternative; 3) Enhanced Coordination Alternative, 4) Maximum Operational Flexibility; and 5) Supply Driven Alternative. It also includes a Continued Current Operations module for comparison purposes. A Preferred Alternative was not identified; however, Alternative 2, the Basic Coordination Alternative or, in effect, the No Deal Alternative, was designated by

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<sup>3</sup> Fort Mohave and Mohave Valley are unincorporated communities and census-designated places within Mohave Valley Irrigation and Drainage District.

Reclamation as the likely action alternative for continued operations in the absence of a consensus agreement among the seven basin states.

Although the DEIS purports to recognize and comply with the Law of the River, the DEIS alternatives impose mandatory reductions **only on Lower Basin** states to accomplish the overarching goal of infrastructure protection of Glen Canyon Dam in continuing times of reduced Colorado River flows. Notably, a dam that was originally constructed to provide storage to allow the Upper Division states to meet their delivery obligations to the Lower Division states under the Compact now constrains delivery of water to the Lower Division states.

No alternative analyzes meaningful, mandatory participation by Upper Division states to protect the infrastructure of Glen Canyon Dam. Further the analysis fails to include flows from the Upper Division states required under the Compact, which is discussed in more detail in the next section. In fact, the alternatives contemplate continued growth in the Upper Division's use even though the Upper Division does not meet its delivery requirements under the Law of the River. The alternatives favor the Upper Division while causing the Lower Basin to experience shortage.

While the alternatives include water conserved by the Upper Division states to be stored in Lake Powell, that conservation appears voluntary. Infrastructure protection releases from the Upper Division states are also contemplated to protect Glen Canyon Dam infrastructure. However, that infrastructure protection water is subject to repayment to the Upper Division states, which will reduce future flows. These alternatives, absent inclusion of releases to meet Compact flows, fail to properly inform the federal decision consistent with the Law of the River and frustrate the purposes for which the Upper Initial Units were constructed.

The storage and delivery of conserved system and non-system water is a necessary component of the next operating guidelines. The DEIS should have included a broader discussion on new and innovative methods to create that conserved water, the sharing of storage space among users, the rules of storage, and permissible transactions with conserved supplies. This feature is of particular interest to Mainstem users who have proposed a new and innovative way to create conserved water as a mitigation measure for adverse effects of the new guidelines.

## **2. The DEIS Fails to Incorporate the Delivery Requirements of the Colorado River Compact of 1922.**

The alternatives, as framed, fail to incorporate the delivery requirements contained in Article III of the Compact. The Compact is the foundational document upon which the Law of the River is based. It apportions to the “the Upper Basin and to the Lower Basin respectively the exclusive beneficial consumptive use of 7,500,000-acre feet of water per annum”.<sup>4</sup> It imposes equally upon each the Upper Division and the Lower Division a delivery obligation if the United States of America recognizes a right in the United States of Mexico to use waters of the Colorado.<sup>5</sup> Specifically, the Upper Division is mandated by the Compact to deliver at Lee Ferry

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<sup>4</sup> The Colorado River Compact at Article III(a).

<sup>5</sup> Id. at Article III (b)

water to supply one-half of the deficiency of the Mexico delivery obligation in addition to that provided by paragraph (d).<sup>6</sup> This delivery obligation necessarily includes a quantity of water to account for evaporative losses experienced during conveyance, as without such a quantity the delivery requirement is not met. Paragraph (d), often referred to as the non-curtailement provision, imposes upon the Upper Division an obligation to not cause the flow of the river at Lee Ferry to be depleted below an aggregate of 75,000,000-acre feet for any period of ten consecutive years.<sup>7</sup> No conditions to excuse performance of the delivery obligation appear in the language of the Compact. The alternatives analyzed in the DEIS do not include flows that meet this delivery obligation.

The supremacy and applicability of the Compact in governing relations between the Upper Division states and the Lower Division states is clear. Statutes and compacts executed after the date of the Compact comprising the Law of the River, by their very terms, are limited by the Compact. The Upper Colorado River Basin Compact (“Upper Basin Compact”), in Article I(b) states “the Colorado River Compact is in full force and effect” and that “all provisions hereof are subject thereto.” This language is a clear, explicit acknowledgement of the non-curtailement provision of the Compact, the obligation to deliver 75-million-acre feet of water plus one-half of the Mexico delivery obligation at Lee Ferry on a rolling ten-year average. The Colorado River Storage Project Act (“CRSP”), at 43 U.S. C. §620m, directs the Secretary of the Interior “in the operation and maintenance of all facilities” authorized by Federal law and under his jurisdiction in the Colorado Basin to comply with “applicable provisions of the Colorado River Compact ... in the storage and release of water from reservoirs in the Colorado River Basin.” Section 601 of the Colorado River Basin Project Act directs the United States to comply the Compact.

While both the Upper Basin Compact and CRSP recognize the right of the Upper Division states to develop use of their apportionment of the Colorado River, those rights of use are necessarily constrained by the Compact’s non-curtailement provision. No words of condition, excuse, exception, exemption, or relief from performance of the delivery obligation by the Upper Division appear within the Compact or any subsequent compact or law comprising the Law of the River.

Reservoirs in the Upper Division states, including Glen Canyon Dam, were constructed to store water to allow the Upper Division to meet its delivery obligations to the Lower Division and to allow the Upper Division to develop its uses of the remaining water.<sup>8</sup> The Upper Division’s development of uses is, was, and always has been, limited by the Compact Article III delivery requirements, including the non-curtailement provision. The Upper Division has long been aware of the Compact constraints on the development of its uses. To now repudiate its Compact obligations, over one hundred years after the negotiation of the Compact, while in times of severe drought and significant sacrifice by the Lower Division states, is inequitable and raises concerns about good faith.

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<sup>6</sup> Id at Article III(c)

<sup>7</sup> Id at Article III(d)

<sup>8</sup> The CRSP Act provides for the construction of storage reservoirs above and below Upper Basin points of use.

### **3. The DEIS Fails to Analyze the Substantial Economic Impacts of the Alternatives.**

River dependent tourism is the main economic driver of Mohave County River corridor communities. Recreation expenditures flow through the community to support businesses, employment, hospitality, and generate sales tax revenues. Bullhead City estimates that river-related tourism generates an estimated \$150 million annually in direct spending in the city and when accounting for secondary and induced economic activity, the economic impact is estimated to range between \$210 and \$255 million per year.<sup>9</sup>

Lake Havasu City's lake-based tourism generates \$835 million in total direct spending annually. The city attracts an estimated 2 million visitors each year, compared to a resident population of approximately 60,000 according to the AZ Commerce Authority.<sup>10</sup> This consistent influx underscores the central role tourism plays in the local economy.

In total, tourism supports more than 6,700 local jobs through hotels, restaurants, retail, and marine services and offsets the tax burden on Lake Havasu City households by generating nearly \$4.2 million annually in Transaction Privilege Tax (TPT).<sup>11</sup>

As stated by the official Lake Havasu City tourism bureau, Go Lake Havasu, "Lake Havasu City features five commercial marinas, 13 RV parks and campgrounds, and 47 miles of shoreline within city limits." Additionally, 995 hotel/motel rooms and 427 suites across 15 hotels and nine resorts. There are numerous vacation home rentals and seven RV parks with over 1,500 sites available.

Additionally, these Mainstem users rely exclusively on Colorado River water for all their water needs. Any severe shortage reduction will unequivocally equate to significant socioeconomic harm as no water supplies would be available to meet even the most basic of needs. This type of socioeconomic harm requires an adequate analysis in the DEIS before the federal action is taken.

The socioeconomic impacts to Arizona as a whole under all of the Alternatives are significant and should be adequately analyzed in the DEIS. This analysis should consider the socioeconomic impacts to mainstem communities as discussed herein, communities within the Central Arizona Project service area, as well as agriculture, both along the river and in central Arizona specifically, not just as a broad generalized category.

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<sup>9</sup> Office of the Mayor, City of Bullhead City Comment Letter to the Bureau of Reclamation dated February 18, 2026.

<sup>10</sup> <https://www.arizonapro prospector.com/mapping.html?ic=Tool+mapping&geoid=0439370&geoEntId=3336f03b-1128-4299-a53b-69807e9bac70>

<sup>11</sup> Go Lake Havasu - business.golakehasu.com

#### **4. Arizona Mainstem Users Need Mitigation Under the Next Guidelines.**

Communities and farms along the mainstream are located either on the floodplain of the Colorado River or within the Colorado River Accounting Surface.<sup>12</sup> Because of this location within the Colorado River Accounting Surface, these Mainstem users, many of which are 4<sup>th</sup> priority users, will be disproportionately impacted by reductions, and in particular deep reductions, without regard to whether those reductions arise under a consensus plan, a plan from an alternative analyzed under this DEIS, or a plan analyzed under a different DEIS that includes Compact flows. All water within the Colorado River Accounting Surface area is deemed hydraulically connected to the river, without regard to any differentiating factors such as isotopes, temperatures, or constituents. In 1997, Mohave County Water Authority commissioned a fifth study to evaluate water in wells located at the base of the foothills to the Black Mountains.<sup>13</sup> All five of the studies revealed the water was more similar in temperature and constituents to water located in the Sacramento Basin rather than the Colorado River yet Reclamation still deemed that water Colorado River water. Even though the Colorado River Accounting Surface has never been adopted by Reclamation as a rule, it has been implemented by Reclamation and these Mainstem users have no groundwater that is not deemed Colorado River water.

As a part of preparing an EIS, a federal agency must consider mitigation of the effects on the local community of the federal action.<sup>14</sup> A meaningful, realistic discussion of possible mitigation options for 4<sup>th</sup> priority Mainstem users is lacking in the DEIS. Mitigation for those adversely impacted users may be accomplished by minimizing the effects by limiting the degree or magnitude of the action and its implementation. It may also be accomplished by providing a substitute resource. A brief discussion of possible mitigation for Mainstem users follows.

##### **a. Mitigation by Delivery of Health and Safety Water**

Under alternatives with the deepest shortages, Mainstem users have **NO** quantity of water available for delivery as all Arizona 4<sup>th</sup> Priority is fully reduced. Nor do they have groundwater available as a replacement source to Colorado River water due to the Accounting Surface concept. These Mainstem users will require deliveries of water, most likely out of priority, for the health and safety of their residents. The Supreme Court in Article III of its 1963 opinion expressly declined to address the issues of shortage so as to leave discretion in the Secretary to act to make an informed decision in the best interest of the Basin States, and the welfare of the Nation. (See Arizona v. California, 373 U.S. 546, 592-594 (1963)) It is clearly within the purview of the Secretary's discretionary powers to address the issue of Health and Safety water deliveries in the Post 2026 Guidelines. An exercise of that discretion to establish Health and

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<sup>12</sup> The Colorado River Accounting Surface was developed in the 1990s and updated in the early 2000s, by the U.S. Geological Survey, in cooperation with the Bureau of Reclamation, to identify wells outside the flood plain of the lower Colorado River that yield water that will be replaced by water from the river. Wiele, S.M., Leake, S.A., Owen-Joyce, S.J., McGuire, E.H., 2008, Update of the Accounting Surface Along the Lower Colorado River (Version 1.0): U.S. Geological Survey Scientific Investigations Report 2008-5113, Report: iv, 16 p.; Appendixes <https://doi.org/10.3133/sir20085113>

<sup>13</sup> Wyman Engineering Consultants, Final Report to Mohave County Water Authority, November 1997.

<sup>14</sup> Section 6.1 Definitions of 516 DM 1-U.S. Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures.

Safety deliveries would provide certainty for Mainstem users of their ability to continue to exist. This concept of health and safety water is more than just life sustaining. It necessarily includes water to support communities, quality of life within the community, economies, financial investments of residents, businesses, and the governmental entity itself.

The DEIS suggested that some municipalities might need to “pursue alternative water sources or hauled water” to support continued services. (DEIS, Section 3.17.2, page 3-193) Unfortunately for Mohave County Mainstem users, there are no additional supplies readily identifiable let alone readily available within reasonable proximity or that are economically feasible. Groundwater, not deemed Colorado River water under the Accounting Surface concept, is located a mountain range away from most of these Mainstem users. Exporting (hauling) water from groundwater basins in Mohave County is prohibited by state statute.<sup>15</sup> Exporting groundwater to Mohave County from statutorily designated transfer basins is prohibited by statute as that groundwater may only be transported to an initial Active Management Area such as the Phoenix or Tucson Active Management Areas.<sup>16</sup> Even absent the statutory prohibitions of export of groundwater, it is difficult to imagine communities with populations of 45,000-65,000 people could haul sufficient quantities of water to sustain communities.

The Arizona Water Bank Statute does include a provision to allow participating Mainstem municipal users, in times of declared shortage, the ability to “borrow” water from the bank.<sup>17</sup> However, that quantity of “borrowed” water must be repaid (replaced). Consequently, participation in the Arizona Water Bank by a Mainstem user provides a very short-term temporary stop gap source for water at an expense to be calculated after the water is used, and replaced at the then current market price, rendering budgeting for water difficult. Agricultural Mainstem users are precluded from participating in the Arizona Water Bank by statute. Agricultural Mainstem users simply have no alternative supplies available.

**b. Mitigation Through Expanded Use of Effluent.**

**i. Augmentation by Effluent in Lieu of Reductions.**

Effluent<sup>18</sup>, water often lost to the system through other uses or evaporation, could be deployed as substitute resource. Rather than reduce use to meet assessed wet water delivery reductions, effluent would be discharged into the aquifer by Mainstem users to augment the system in an amount equal to assessed wet water reductions. The effluent in lieu of reductions would be subject to an assessment for the benefit of the system like a conserved water supply yielding a positive gain to the river equal to the system assessment. Other Colorado River water users have been allowed to expand the use of effluent to create resiliency in their water supplies. Mainstem users need the same ability to benefit from their effluent supply, even if it looks and works a bit different than previously approved practices. Increased flexibility in the use of

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<sup>15</sup> A.R.S. §45-544.A.2

<sup>16</sup> A.R.S. §45-551 et.seq.

<sup>17</sup> A.R.S. §45-2457

<sup>18</sup> Section 5 Contracts for MCWA and its members do not require effluent be returned to the system.

effluent as a supply by Mainstem users will be necessary if users are to survive continued aridification and the reductions in use contemplated by this DEIS.

**ii. Effluent Used to Create Conserved Supplies Stored in Lake Mead.**

Another feasible opportunity for mitigation is the use of effluent as a new and innovative method to create conserved supplies to be stored in Lake Mead. The concept of using effluent to create conserved supplies stored in Lake Mead is like the creation of system water by Bullhead City that is stored in Lake Mead under the Pilot Conservation Program. In this proposal, effluent is discharged into the aquifer in a manner and location approved by Reclamation. Reclamation then reduces releases from Lake Mead. Under this mitigation proposal, the creator would receive a credit for the quantity of newly created conserved supply, subject to the system and evaporation assessments applied to other conserved supplies. The effluent qualifies to create a conserved supply because it is not deployed for other use or lost to the system through evaporation.

**iii. Delivery of Effluent for Agriculture or Amenity Use.**

Mitigation could also be provided to irrigation Mainstem users through the delivery of effluent for crop production or as a source of water for amenities such as golf courses and lakes. The impediment to this mitigation proposal is the cost of construction of a delivery system. Use of the aquifer for delivery of the effluent removes the cost impediment making the supply more affordable to the end user and more importantly, makes a supply available to a Mainstem user with no other available supplies. Effluent delivered through the aquifer would be subject to a system assessment established for conserved supplies. This form of mitigation is most effective when the geographic location of discharge and withdrawal are disregarded. An example of this geographic disregard would be the delivery of effluent by Lake Havasu City to a golf course in Mohave Valley. The golf course would divert a quantity of water at an authorized diversion point in Mohave Valley and Lake Havasu would augment the aquifer at an authorized discharge point in amount equal to the diverted quantity of water plus a system assessment. This transaction all occurs within the same stretch of the river and nets out to a zero diversion with a small augmentation gain for the system. It does, however, require flexibility for this new and innovative approach to the deployment of effluent supplies.

Mainstem effluent could also be used to mitigate other 4<sup>th</sup> priority users. A contract holder or subcontract holder in the Central Arizona Project service area could acquire effluent from a Mainstem entity. The acquired effluent would be discharged into the aquifer at an approved diversion point, subject to a system assessment, conveyed through the river system to the Mark Wilmer Pumping Station to be wheeled to the CAP service.

**iv. Stepped Transactions to Deliver Effluent.**

If use of the river system as a delivery vehicle remains objectionable, the conserved water supplies could be created as discussed in b(ii) above, and then that conserved supply delivered to the end user. This step-to-date transaction adds complexity to the proposal requiring additional record keeping requirements and limits on the storage and delivery of conserved supplies in Lake

Mead. If the conserved supplies are created and delivered in the same accounting year, they could be excluded from creation and storage limits.

These mitigation proposals are different from past practices and are based on expansive, less constrained approaches to use of the river aquifer. Concerns may exist about abuses in this concept. However, properly structured, use of effluent to provide resiliency to Mainstem users could be subject to verifiable accounting practices established by Reclamation, which includes the use of meters to measure quantities of effluent discharged into the river system.

**c. Mitigation by Timing of Flow Releases through Davis Dam.**

The DEIS only evaluates economic impacts on agriculture and recreation. The recreation evaluated occurs within the National Park Service areas of Lake Powell, the Grand Canyon between Lake Powell and Lake Mead, and Lake Mead. It disregards the economic impacts on recreation activities on the river below Davis Dam. Although the DEIS does state that Lakes Mohave and Havasu will be operated under the same rule curve, it fails to discuss in any detail any reductions in releases from Davis Dam. Assuming operationally water continues to move through the system from Davis Dam South, water will flow below Davis Dam to Lake Havasu. However, the DEIS is silent on releases from Davis Dam, as to both quantity and timing, and the effects of those flows on communities located within that stretch of the river.

The DEIS does state that river flows would be between 5,000 cfs and 8,000 cfs. It was not clear if those flows applied to the entire river. The economies of communities along the river are dependent upon flows in the river as well as lake elevations. All water dependent activity, boating, personal watercraft riding, kayaking, and fishing will all be adversely impacted by reduced releases from Davis Dam, and perhaps more importantly, by the timing of the reduced releases. The adverse economic effects that Bullhead City and Laughlin, Nevada may experience are significant if the high flow releases occur in the evening hours outside of normal recreation times. These adverse economic effects could be mitigated by running higher releases through the midday when visitors and residents are recreating. Simply put, higher flows in the afternoons are needed to sustain these river dependent tourism economies.

Sediment accumulation at the mouth of Lake Havasu because of low flows is an issue, one that is likely not going away or easily addressed. The river no longer flows at a volume to carry the sediment beyond the mouth of the lake where river flows decrease in velocity. This sediment accumulation, or sandbar, is becoming an increasing concern as it impedes navigation and creates a hazard. Some areas of the river, just above the mouth of the lake, are no longer accessible due to the sediment. Possible mitigation of this effect would be to dredge this area of the river to improve navigation. An increase in flow velocity sufficient to move the sediment is not an option.

**5. CONCLUSION**

MCWA appreciates and understands Reclamation is working to develop a solution that fairly balances the interest of all Basin water users within the Law of the River and the authorities it believes the Secretary possesses. The alternatives analyzed in the DEIS miss the mark. They place the burden of protecting the infrastructure almost exclusively on the Lower

Division states. The DEIS should be withdrawn, the alternatives revised to incorporate Compact flows and new analysis conducted based upon these changes. A failure by Reclamation to include Article III Compact flows in the alternatives deprives the Lower Division states of the benefit of its bargain with the Upper Division states reached in 1922, and unfairly and disproportionately shifts the burden of infrastructure protection onto Arizona.

Mainstem uses constitute just less than 10% of the Arizona's apportionment. The same or similar opportunities to develop use of Colorado River entitlements have not been made available to Mainstem users in the same manner as other 4<sup>th</sup> priority users in the State. Our communities are small and often marginalized economically and politically.

We have been outstanding stewards of our water entitlements, extending supplies through early conservation efforts to our own detriment as evidenced by the shortage provisions of the Supplemental Environmental Impact Statement to 2007 Guidelines which, in effect, allocated water based upon historical use rather than consistent with contract terms. Although the disparate treatment at the state level has always been of concern, we found assurance through the years in certain protections built into our federal water contracts and the role of the Reclamation as the water master. Despite reassuring language in the DEIS that Reclamation does not intend to reduce entitlement quantities or terminate entitlements, concerns arise out of statements in the DEIS that Mainstem unused entitlements are not intended to confer reliable long-term access to Colorado River water categorizing unused Mainstem entitlement contracts as equivalent to CAP excess contracts.<sup>19</sup>

We have proposed creative, new, and innovative uses of effluent to build resiliency in the water portfolios of our members as well as other 4<sup>th</sup> priority users. We request these mitigation proposals for the expanded use of effluent be given thoughtful consideration as effluent provides an affordable and attainable mitigation solution for Mainstem users. We believe the Secretary, through the exercise of his discretionary powers, can and should mitigate the effects of the next set of guidelines on Mainstem users.

Very truly yours,

Mohave County Water Authority

  
Chairman Cal Sheehy  
Lake Havasu City Mayor

cc: The Honorable Mark Kelly  
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<sup>19</sup> See Appendix C-Shortage Allocation Model and Alternative Distribution Model Documentation at page C-6

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