



February 25, 2026

Via U.S. Mail
and e-mail

Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006
Crbpost2026@usrb.gov

Re: Town of Cave Creek, Arizona - Comments to Draft Environmental Impact Statement for Post-2026 Operation Guidelines and Strategies for Lake Powell and Lake Mead

To Whom It May Concern:

These comments are submitted on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines for Lake Powell and Lake Mead (the "DEIS"). The Town of Cave Creek requests that the Bureau supplement and incorporate the information in this letter into Chapter 3 of the DEIS regarding the significant socioeconomic and cultural impacts of all alternatives that would, if adopted, reduce the quantity of water delivered to the Central Arizona Project's subcontractors in Central Arizona, one of which is the Town of Cave Creek. A decision on the alternatives presented in the DEIS should not be made without considering and effectively minimizing these known impacts.

The Town of Cave Creek (the "Town"), located about 10 miles north of the City of Phoenix, Arizona, is a municipal corporation with a population of approximately 5,144 people. The Town consists largely of residences interwoven with natural desert landscapes and a limited number of mostly retail businesses and restaurants. The Town owns and maintains its own water and sewer systems that serve its mostly domestic customers within the Town's boundaries. **The Town's water supply is one hundred percent (100%) Colorado River water delivered directly to the Town's surface water treatment plant through the Central Arizona Project Canal ("CAP Canal") pursuant to the Town's CAP water subcontracts.** The local groundwater aquifer beneath and surrounding the Town is overtaxed by private wells and remaining supplies are very low, so the Town's use of local groundwater is not a reliable alternative or long-term supplemental water supply.

In addition, the Town owns and operates a water system serving mostly residential customers in the unincorporated Desert Hills area of Maricopa County, Arizona, located directly west of the Town's municipal limits. There are 1,848 water customer accounts currently in the Desert Hills water system and growth of that system was effectively stopped years ago due to a lack of long-term water resources. Although the Desert Hills area was originally developed with groundwater from a few local groundwater

wells, the well capacity has declined over time, and the Town has had to increasingly supplement the groundwater supplies with the Town's CAP water. For the past several years, **over 70 percent** of the water delivered to Desert Hills customers has come from the Town's CAP water subcontracts. This is expected to increase as the area groundwater aquifer continues to decline.

As is shown on the enclosed water supply planning chart, and ignoring the hoped-for success of short-term measures the Town has been pursuing that could provide some amount of short term relief, with an assumed 25% reduction to the Town's municipal and industrial-priority CAP subcontract deliveries starting in 2027, the Town's **existing water customers, most of whom are residential customers would experience shortages starting immediately in 2027.** These shortages are anticipated to start at approximately four percent of the Town water customers' existing uses, but will increase to more than seven percent over time even with the measures the Town has taken to date to stop water demand growth. After emergency measures are exhausted, and even with significant conservation efforts by residents, these long-term shortages to existing homes and business will persist and are anticipated to have real and significant adverse effect on a daily basis for existing residents.

The impacts described in these comments are **not** impacts to the Town's expectation of population growth. Rather, the described impacts are to existing residents with homes, children, pets, and businesses already using the Town's water supply. Voluntary and involuntary measures could be taken to address a small percentage cut, and we assume the Town residents could survive, but there would still be property damage, including lost landscaping plants, damaged swimming pool linings and loss of use, lost horse and stock raising ability, lost business revenue for businesses that use water, and related property value declines.

A larger percentage reduction to the CAP supply poses, in addition to the above impacts, more immediate health and safety dangers to people and animals living in the Town's water service area, including potential loss of the Town's ability to pump water to homes for domestic uses or to fight fires.

The United States in the post-2026 reallocation process has heard many dire warnings about the consequences of various water reallocation scenarios, but the Town of Cave Creek will be affected by wet water shortages more directly, more immediately, and more seriously than many other Colorado River water users. The Town asks that any alternative selected include protection of most of the CAP water supply to protect the health, safety, and economic well-being of the Town's residents.

Sincerely,



Robert Morris
Mayor

c: Governor Katie Hobbs
John Kavanagh, Senate Majority Leader
Patrick Adams, Sr. Advisor for Water Policy
Brenda Burman, General Manager (Central Arizona Project)
Thomas Buschatzke, Director (Arizona Department of Water Resources)
Town Council
Town Manager
Cave Creek Utilities Director
Michele Van Quatham
Brad Hill

Town of Cave Creek Updated Water Shortage Projections

In support of the
Town of Cave Creek Comments
Draft Environmental Impact
Statement Post-2026



by
Arizona Water Buffalo, LLC

25% CAP M&I Reduction
100% CAP NIA Reduction

February 25, 2026

Based upon Water Demands
Black & Veatch Integrated Utility
Master Plan 2024

* Town estimated to have a small amount of growth per year due to vested development rights granted in the past

