

MARCH 2, 2026

Via email: crbpost2026@usbr.gov

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

RE: Comments - Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

As Arizona's agency charged with advancing a comprehensive strategy for augmenting the state's water needs for future generations, the Water Infrastructure Finance Authority (Authority) fully supports the Arizona Department of Water Resources' comments and continued efforts to protect Arizona's apportionment of the Colorado River. We urge the Secretary to pursue a solution that properly implements the Colorado River Compact's requirements and avoids catastrophic impacts on Arizona's economy, environment, and future. No such solution is outlined in the Draft Environmental Impact Statement (DEIS).

As part of the Authority's specific charge to lead long-term water supply augmentation strategies and strengthen Arizona's future water security, the Authority has also reviewed the DEIS in light of the augmentation projects currently under review. The reductions proposed in the alternatives announced by the USBOR in January could significantly impact the future of Colorado River supplies in Arizona and directly impact the viability of any regional augmentation projects.

Several importation supply concepts, including desalination projects, rely on the future ability of Basin partners to voluntarily develop an exchange framework. Future operational guidelines should not constrain or preclude Colorado River water exchange mechanisms. Operational guidelines that limit flexibility for exchanges could limit tools and resources needed to address the ever-changing hydrologic conditions and water supply imbalances facing the Basin. If exchanges are constrained, so too are the Basin's future water supply options; we must not foreclose viable supply investments before they are fully evaluated.

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The Authority recognizes the complexity of this effort and respectfully urges that, in addition to maintaining compliance with the Colorado River Compact, the final guidelines preserve needed exchange flexibility for the Basin.

Respectfully Submitted,



Chelsea McGuire
Director

Cc: Thomas Buschatzke, Director, Arizona Department of Water Resources