

ARIZONA WATER COMPANY

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February 25, 2026

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

Re: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead,
Draft Environmental Impact Statement, #20250184.

Arizona Water Company (AWC) is a private water company that operates 24 water systems across eight counties in Arizona. AWC has four Colorado River water subcontracts totaling 18,137 acre-feet of water delivered via the Central Arizona Project. Colorado River water is a critical part of AWC's water supply portfolio. AWC provides the following comments regarding the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, Draft Environmental Impact Statement (Post-2026 DEIS, or DEIS).

The Post-2026 DEIS describes five operational alternatives and includes an enormous amount of data and analyses, but it is incomplete in that it fails to analyze compliance with the 1922 Colorado River Compact (Compact) Article III(d). Article III(d) notes that the States of the Upper Division will 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.

This provision of the Compact is not discretionary. The United States is required to operate the Upper Basin dams to deliver 75 million acre-feet (maf) on a rolling 10-year average to the Lower Basin States regardless of how this is accomplished. That includes utilizing Secretarial discretion to deliver water from the Upper Initial Units above Lake Powell. The Post-2026 DEIS is flawed and incomplete in that it fails to uniformly model water releases from the Upper Initial Units and it fails to analyze the Compact release requirement, and as a result, the vast majority of adverse impacts of poor hydrology fall solely to CAP water users.

The DEIS incorporates a 602(a) storage algorithm that is flawed in that it preserves over 5.0 maf of storage in the Upper Basin for power production – giving electrical power generation preference over water deliveries. Compact Article IV(b) specifically notes that the impounding of water for the generation of electrical power is subservient to the use and consumption of water for agricultural and domestic purposes and shall not interfere with such dominant purposes. Further,

the Upper Basin depletion schedule that is utilized in the analyses characterizes unmet Upper Basin demand as a depletion, thus artificially inflating Upper Basin demand and further penalizing CAP water users by exacerbating shortage reductions.

The Lower Basin States submitted a viable alternative to Reclamation in March 2024. That alternative included mandatory reductions to the Lower Basin and Mexico of 1.5 maf under most system conditions. It also utilized actual hydrology measured as total system contents of Flaming Gorge, Blue Mesa, Navajo, Powell, Mead, Mohave and Havasu to determine the operating condition – rather than forecasts and estimates of water supply.

The Lower Basin States Alternative would protect Lake Powell elevations by using total system contents to increase Powell storage. And perhaps most importantly it offers more predictability under critical system conditions. Only in the most extreme circumstances would the Upper Basin States be required to share equally with the Lower Basin States in water use reductions.

The DEIS analyzes alternatives that would be devastating to CAP and to the entire Arizona economy, while ignoring key provisions of the Colorado River Compact. The Lower Basin Alternative directly meets the purpose and need of the proposed federal action including coordinated reservoir operations, infrastructure protection, reductions of 1.5 maf under most conditions and storage and delivery of conserved water. When compared with the DEIS alternatives, the Lower Basin Alternative is more technically sound and equitable than any of the DEIS alternatives.

AWC appreciates the opportunity to provide comments regarding the Post-2026 DEIS. It is unfortunate that the document is deficient in its key elements as noted above. We urge the Secretary to reconsider the alternatives presented in the Post-2026 DEIS and to acknowledge the requirements of the Compact in its analyses and operational algorithms. We believe that the Lower Basin Colorado River water users remain committed to doing their fair share to address these water supply challenges.

Very truly yours,



Fredrick K. Schneider

President and Chief Operating Officer