



Friday, Feb. 27, 2026

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
Washington, D.C. 20240

CC:

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

Re: Comments on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

Dear Secretary Burgum,

As President & CEO of Greater Phoenix Economic Council (GPEC), I respectfully submit this letter regarding the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. The Draft EIS alternatives in their current form all present dire economic impacts on Arizona and its residents.

The state of Arizona has a deep history of responsible, forward-looking water management. From early 1900s dam construction to the 336-mile canal via the Central Arizona Project (CAP) in 1973, Arizona has been steadfast in its work for more than a century to plan for sustainable water consumption. This has at times been with the assistance of the federal government – such as with Bureau of Reclamation funding for the Roosevelt Dam –along with state-led initiatives – like the 1980 Groundwater Management Act that ensures a 100-year water supply for all new plats of land.

Ten municipalities across Greater Phoenix hold subcontracts for Colorado River water delivered through CAP, which collectively serve 3.7 million residents, accounting for over half of Arizona's population. State and national leadership have long worked hand-in-hand to secure water welfare for the state's residents and business, helping create a bastion of life and business for the fifth-most populous city in the country. Behind these efforts, Arizona today uses toughly the same amount of water as it did in the 1950s, despite a 7x increase in population and 15x economic increase. The state limited its water usage and cooperated with its fellow other Basin states – and in response, these drafted alternatives would punish Arizona for its water stewardship. It is an unthinkable way to respond to the state's proactive work.

Under the threat to Arizona of cutting as much as half its total water supply and absorbing reductions earlier than other Lower Basin states, the Bureau is risking a large and



disproportionate impact on a state that has nurtured one of the fastest-growing economies, populations and industry bases in the country. This would create a crisis for agriculture, industry and livelihoods, and undermine the stated goals of the Trump Administration to reshore manufacturing and bring back American jobs while reducing reliance on foreign markets. Just this week, it was announced that Taiwan surpassed Canada and China to become Arizona's second-largest trading partner in 2025, with more than \$21.2 billion in total trade. These investments have created jobs in computer chips, semiconductors, aerospace and metal ore, which are all critical to our nation's defense.

International giants TSMC (Phoenix), LG Energy Solution (Queen Creek) and Amkor (Peoria) have committed to invest a combined \$177.5 billion in Arizona and create nearly 7,000 jobs and more than \$20 billion in economic output through 2030, as well as tens of thousands of jobs in future phases. Further, a robust supply chain has followed TSMC, as more than 50 semiconductor companies and suppliers have entered the region since 2020 and added an additional 9,500 jobs in Arizona. These cuts threaten the return of semiconductor production and advanced manufacturing to the U.S., directly eroding the progress toward achieving national security and economic goals set by the Trump Administration. The economic value of a gallon of water is clearly identified in these priorities, and that value is provided in the future of Arizona.

As these companies develop advanced technologies, they are carrying on the local tradition of water stewardship. Companies like Intel and TSMC have funded water restoration projects including water reclamation plants to maximize reuse, proving yet again that water goes further in Arizona. Yet companies have taken on these responsibilities based on current usage and reasonable assumptions for future supplies. Cutting water now, to the degree outlined in the Bureau's proposals, would be ruinous to the nation's reputation as a trustworthy, secure market for global business and force companies to reconsider plans to invest billions of dollars into the economy.

I respectfully request that the DOI withdraw the DEIS and re-issue alternatives that equitably address the impacts to lower basin states. I welcome the opportunity to work with the DOI and Bureau of Reclamation to ensure a robust revised DEIS that complies with applicable law and the best interests of Arizona and its residents.

Thank you for the opportunity to comment on this critical matter.

Regards,

A handwritten signature in blue ink, appearing to read 'CM', written over a light blue horizontal line.

Christine Mackay
President & CEO
Greater Phoenix Economic Council