



SENT VIA ELECTRONIC MAIL TO: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

March 2, 2026

**Southern Arizona  
Home Builders  
Association**

The Honorable Doug Burgum  
Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

2840 N. Country Club  
Tucson, AZ 85716  
[www.sahba.org](http://www.sahba.org)

**PRESIDENT & CEO**  
David M. Godlewski

**RE: Southern Arizona Home Builders Association (SAHBA) Comments on  
Draft Environmental Impact Statement for Near Term Colorado River  
Operations (DEIS dated January 16, 2026)**

**EXECUTIVE OFFICERS**

Dear Secretary Burgum:

**Chair**

Anjela Salyer  
Mattamy Homes

The Southern Arizona Home Builders Association (SAHBA) appreciates the opportunity to provide comments on the *Draft Environmental Impact Statement for Near Term Colorado River Operations, dated January 16, 2026* (DEIS).

**1<sup>st</sup> Vice Chair**

Mike Vasquez  
Vasquez Custom  
Construction

SAHBA is a non-profit corporation organized under the laws of the State of Arizona. Formed in 1953 in support of businesses in the housing and building trade industries in southern Arizona (including Pima, Cochise and Santa Cruz Counties) our role is to address issues and concerns relating to those industries. Currently, SAHBA has approximately 300 member businesses, which include real estate developers, home builders, general contractors, consultants, trade partners and other businesses in southern Arizona who are involved in and dependent on the home building industry. Specifically, SAHBA aids its members, as well as southern Arizona’s building industry in general, by providing information, engaging with government officials, and commenting on legislation and agency rules when they impact their livelihood.

**2<sup>nd</sup> Vice Chair**

Greg Mohl  
Sunbelt Holdings

**Secretary/Treasurer**

Randy Agron  
A.F. Sterling Homes

**Immediate Past Chair**

Andrew Gasparro  
KB Home

Water from the Colorado River has been integral to Southern Arizona’s economy and it is essential to ensure home builders can provide safe, reliable and affordable housing for our growing community. Home builders, and our local communities, depend on the long-term viability of the River and Central Arizona Project (CAP). The outcome of the post-2026 operating guidelines will fundamentally alter water allocation rules, shortage tiers, and reservoir management for the Southwest directly affecting deliveries through the CAP. If future guidelines reduce Arizona’s allocation or increase volatility, our economy and housing market will suffer greatly.

Affiliated With



We would like to echo key points raised by agencies, water providers, and other Arizona stakeholders. We respectfully request they be addressed and remedied prior to a final determination.

- 1. The Draft EIS fails to present any Alternative that adheres to the Colorado River Compact, in direct contravention of federal law requiring the Bureau of Reclamation to implement the Colorado River Compact.**

The Colorado River Compact obligates the Upper Basin to deliver a minimum of 82.5 million acre-feet of water to the Lower Basin over any rolling ten-year period. While the Draft EIS references the Law of the River, it does not present an Alternative that fully enforces these Compact delivery requirements. Rather, each of the five proposed Alternatives assumes that the Upper Basin will neither substantially curtail its uses nor satisfy its delivery commitments. Should these obligations not be met, the Lower Basin states may seek enforcement. An Alternative that meaningfully incorporates and enforces the Compact framework would more faithfully adhere to federal law while reducing significant risks to Arizona's economy, national security interests, and the United States' trust responsibilities to Tribes.

- 2. The Draft EIS fails to consider the substantial economic and national security impacts that would result as a consequence of the severe shortages proposed under each Alternative.**

All five Alternatives outlined in the Draft EIS would result in significant reductions to Arizona's Colorado River allocation, placing critical segments of the national economy at risk and implicating national security interests. Millions of Arizonans rely on CAP deliveries for municipal drinking water, yet the Draft EIS does not sufficiently evaluate the socioeconomic consequences of substantial supply reductions on these communities. Arizona's agricultural sector has already absorbed considerable cutbacks, with potential ramifications for national food security that warrant more thorough analysis. In addition, the state's advanced manufacturing, semiconductor, defense, and bioscience industries, along with mainstem communities lacking alternative water sources, would face serious economic and public health impacts that the Draft EIS does not adequately examine.

Home building makes a significant contribution to Arizona's economy which is not considered in the Draft EIS. According to the National Association of Home Builders in a typical local area, constructing 100 single-family homes generates roughly \$28.7 million in local income, \$3.6 million in taxes and other government revenue, and 394 local jobs in the first year, with additional ongoing benefits as the homes become occupied.

In 2025, there were approximately 2,900 homes built in the Tucson MSA, which using this data would mean and impact of: 11,426 local jobs, \$832.3 million in local income and \$104.4 million in taxes and other government revenue to our local economy.

The Alternatives in the draft EIS would put the brakes on housing development and homeownership putting our local and state economies at risk.

**3. The Draft EIS assumes continued Upper Basin water demand growth while the federal government implements severe shortage reductions to Lower Basin water users.**

The Draft EIS presumes growth in Upper Basin water use while failing to consider corresponding reductions, resulting in disproportionate burdens on the Lower Basin. Prior to implementing additional cuts on Lower Basin users, the United States must ensure that the Upper Basin States are complying with their 1922 Compact delivery obligations, including through a Compact call if warranted. The United States should also evaluate scenarios in which the Upper Basin holds demands at current levels, without growth, recognizing that expanding infrastructure to support additional use is unlikely given the water supply is unreliable.

**4. The Draft EIS should acknowledge and protect the United States' trust responsibility to Tribes, particularly those with settlements that include CAP water.**

The Draft EIS must also recognize and protect the federal trust responsibility to Tribes, particularly those with CAP water settlements. Each of the five alternatives would impose substantial reductions on Arizona Tribes that depend on CAP supplies, adversely affecting not only Tribal communities but also Arizona municipalities that rely on leased Tribal water pursuant to settlement agreements. The Secretary must ensure that these settlement obligations are fully satisfied.

For these reasons, the Draft EIS would place disproportionate and inadequately analyzed burdens on Arizona by assuming increased Upper Basin use without ensuring Compact compliance, while imposing severe reductions on Lower Basin supplies. The proposed alternatives threaten CAP-dependent communities, undermine Tribal water settlements, and create significant uncertainty for Arizona's economy. In Southern Arizona, this uncertainty directly harms the home building industry, where reliable water supplies are essential to continued housing development and economic stability.

Sincerely,



David M. Godlewski  
President & CEO

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