

arizona municipal water users association

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November 10, 2005

Mr. John A. Johnson
U.S. Bureau of Reclamation
P.O. Box 61470
Boulder City, Nevada 89006-1470

Dear Mr. Johnson:

By letter dated September 22, 2005, the U.S. Bureau of Reclamation informed interested parties that it was initiating yet another public process to "...solicit information about potential methods to recover or replace the bypass flow (currently being discharged into the Cienega de Santa Clara)." As the Bureau notes, system storage has been used to make up for the approximate 100,000 af of water bypassed annually. With the Central Arizona Project (CAP) as the junior diverter in the lower Colorado River basin, the make up water can be easily characterized as CAP water, and the continued use of system storage to make up the bypass flow may, in fact, have hastened the day when the Secretary of the Interior is forced to declare a shortage in the lower basin, i.e. hastened the day when the CAP will be shorted.

What is troubling about this latest process announced by the Bureau is that it has been divorced from another process initiated by the Bureau this past summer to examine the most appropriate management strategies for the operation of Lakes Powell and Mead under low reservoir conditions. Future shortages in the lower basin, operation of Lakes Powell and Mead, bypass flows and deliveries to Mexico, and YDP operation are inextricably linked, and the problems cannot be adequately resolved without a holistic examination of the situation.

At the October 5, 2005 public meeting in Phoenix it became apparent that the Bureau is attempting to provide the April 22, 2005 recommendations of the Yuma Desalting Plant/Cienega de Santa Clara Workgroup ("Balancing Water Needs on the Lower Colorado: Recommendations of the Yuma Desalting Plant/Cienega de Santa Clara Workgroup") with official sanction. The recommendations are thought provoking and, if they are implemented, would probably resolve the conflict between operation of the YDP and continued bypass of the flows that maintain the Cienega de Santa Clara. The recommendations, however, require additional study and evaluation, a reliable estimate of their implementation costs and identification of the funding source(s) for implementing them. Moreover, some of the recommendations may also require enactment of Federal legislation and/or amendment of the international treaty with Mexico.

The Bureau should immediately undertake those efforts necessary to adequately evaluate the viability of the Workgroup's recommendations. However, these efforts will take some time, and

we are concerned that there will not be enough time to successfully undertake these efforts prior to a future shortage declaration. So, in the mean time, the Bureau should concurrently prepare to operate the YDP.

We appreciate the opportunity to comment on an issue vital to Arizona's water future.

Sincerely,

A handwritten signature in black ink that reads "Steven L. Olson". The signature is written in a cursive style with a large initial 'S'.

Steven L. Olson
Executive Director

- c: Herb Guenther, Director, Department of Water Resources
- D. S. "Sid" Wilson, General Manager, Central Arizona Water Conservation District