



Environmental Resources Department

Fax Cover Sheet

DATE: Monday, April 30, 2007

TO: Regional Director
U.S. Bureau of Reclamation, Lower Colorado Region

FAX #: (702) 293-8156

FROM: Stephen Rot, Environmental Program Manager

SUBJECT: City of Glendale, Arizona Comments regarding the Draft Environmental Impact Statement for Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

PAGES: 3 (including cover)

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April 30, 2007

Regional Director
Attn: BCOO-1000
Lower Colorado Region
US Bureau of Reclamation
PO Box 61470
Boulder City, NV 89006

Via Fax (702) 293-8156 and Regular Mail

Re: Draft Environmental Impact Statement for Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Dear Regional Director:

The City of Glendale (City) appreciates the opportunity to provide the following comments on, the Draft Environmental Impact Statement for Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (DEIS). As a member of the Arizona Municipal Water Users Association (AMWUA), the City endorses and supports the comments submitted by AMWUA regarding the DEIS. Additionally, the City supports the comments submitted by the Arizona Department of Water Resources on behalf of the State of Arizona.

The City of Glendale provides water service to over 244,000 people, and relies significantly upon Colorado River water supplies, delivered via the Central Arizona Project (CAP) to meet its water demand. The City's CAP water supplies include subcontracts for Municipal and Industrial priority water, leases for Indian priority water, and some non-Indian agricultural priority CAP water. Together these Colorado River supplies provide over 36% of the City's annual water demand. Because of its reliance upon CAP water supplies of differing priority, the City must effectively consider its exposure during a declared Colorado River shortage. As such, and in light of the fact that the CAP is the largest junior priority user under the Law of the River, the City is very interested in the outcome of the shortage criteria and coordinated reservoir operations process.

The junior priority of the CAP results in an increased risk to Arizona water users when a shortage declaration is made. It is imperative that the selection and implementation of a preferred alternative fully consider and minimize those risks. The selection and implementation strategies of a preferred alternative should also consider existing statutory authority and the Law of the River. The Basin States Alternative represents a unique collaboration effort on the part of each of the seven Colorado River Basin States, and is the only alternative that meets these criteria. Therefore, the City supports the selection of the Basin States Alternative as the preferred alternative in the final

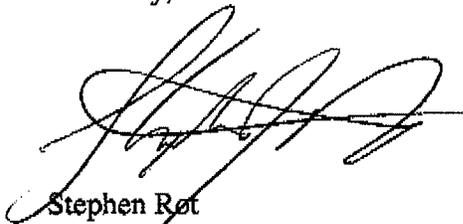
environmental impact statement, and implementation of the Basin States Alternative through the record of decision.

Additionally, the City of Glendale is concerned that the DEIS does not fully consider the economic impacts of a Lower Basin shortage on municipal water providers in Central Arizona. The DEIS incorrectly presumes that there will be no economic impacts on CAP water users, and effectively penalizes those users for their advanced planning efforts and activities. The City of Glendale has expended significant sums of money in developing a diverse water resources portfolio; implementing and maintaining a strong water conservation program; designing and constructing integrated infrastructure systems to efficiently utilize those diverse supplies; underground storage and recovery systems; and reuse of reclaimed water. In spite of the City's advance planning efforts, and the City's integrated drought management plan, there will be additional economic impacts associated with Colorado River supply shortages. Complete analysis of these impacts should be incorporated into the final environmental impact statement.

Economic considerations in the DEIS are further exaggerated by the fact that the DEIS only analyzes impacts relating to shortages in a single year. Cumulative shortage impact analyses should be incorporated into the final environmental impact statement.

Again, the City of Glendale appreciates the opportunity to provide comments on the DEIS.

Sincerely,



Stephen Rot
Environmental Program Manager-Water Resources

Cc: Herb Guenther, Director, Arizona Department of Water Resources