

April 30, 2007

Regional Director
Lower Colorado Region
Bureau of Reclamation, Attention BCOO-1000
P.O. Box 61470
Boulder City, NV 89006-1470

Re: Notice of Availability and Notice of Public Hearings for the Draft Environmental Impact ("EIS") Statement for the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead.

Dear Regional Director,

The City of Mesa ("Mesa") submits its comments to the Draft EIS for the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (72 Fed. Reg. 9026, February 28, 2007).

Mesa is the third-largest city in Arizona. Mesa receives electricity from the Colorado River system that it in turn delivers to approximately 15,000 power customers and receives water from the system that it delivers to over 450,000 water customers. Mesa currently makes beneficial use of nearly 55,000 acre-feet of water per year from the Central Arizona Project ("CAP"), and ultimately expects to use at least 80,000 acre-feet per year of CAP water, including water that is of Municipal & Industrial, Indian, and Non-Indian Agricultural priority. Because of this, and because the CAP is the junior diverter in the lower basin, the strategies for shortage criteria and coordinated operations for Lake Powell and Lake Mead currently being developed are of critical importance to our citizens. The prospect of shortage on the Colorado River system already impacts our citizens because Mesa expends enormous resources to mitigate the impacts of future shortages. When actual shortage comes, the impacts will be even greater and the costs will be even higher.

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For Mesa's proactive planning to be meaningful and productive, there must be some reasonable degree of certainty regarding the manner in which shortages will be determined and managed. Of those analyzed, the Basin States' alternative provides Mesa with the greatest degree of certainty.

Some of the alternatives listed seem to penalize Mesa by assuming that Mesa can bear a greater burden of Colorado River shortage precisely because it has taken a proactive approach towards mitigation of shortages through efforts to diversify its water resources portfolio. The Secretary should please remember that all resources used to protect against shortages are a cost to citizens every bit as burdensome as resources expended after shortage has been declared. Moreover these costs are cumulative over very long periods of time.

Mesa has maintained active interest and involvement in the federal government's efforts to finalize criteria for the declaration and management of shortage on the Colorado River. Mesa provided previous comments to the U.S. Bureau of Reclamation during the scoping process and participated in the Arizona stakeholder group to work collaboratively on development of shortage criteria that both manage and minimize the impacts of shortage.

The Basin States' alternative is the result of a coordinated effort between all seven Colorado River Basin States. Mesa urges the Secretary to adopt the Basin States' Proposal as the preferred alternative in the final environmental impact statement and to implement the Basin States' alternative through the final Record of Decision.

Sincerely



Kathryn Sorensen
Water Resources Coordinator

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