



August 15, 2022

*Submitted electronically*

The Honorable Debra Haaland, Secretary of the Interior  
Department of Interior  
1849 C Street NW  
Washington, DC 20240

The Honorable Tommy Beaudreau, Deputy Secretary  
Department of Interior  
1849 C Street NW  
Washington, DC 20240

The Honorable Tanya Trujillo, Assistant Secretary for Water and Science  
Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

The Honorable Camille Touton, Commissioner  
Bureau of Reclamation  
1849 C Street NW  
Washington, DC 20240

Re: Notice of intent to prepare a supplemental environmental impact statement and notice to solicit comments and hold public scoping meetings on the Development of Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

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Secretary Haaland, Assistant Secretary Trujillo, Deputy Secretary Beaudreau, and Commissioner Touton

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Dear Secretary Haaland, Deputy Secretary Beaudreau, Assistant Secretary Trujillo, and Commissioner Touton:

The Association of Metropolitan Water Agencies (AMWA) welcomes the opportunity to comment on the notice of intent to prepare a supplemental environmental impact statement and notice to solicit comments and hold public scoping meetings on the Development of Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. AMWA is an organization representing the largest publicly owned drinking water utilities in the United States, and collectively its membership serves more than 160 million people. Members serve communities of more than 100,000 people across the country. AMWA's membership includes many of the largest drinking water suppliers reliant on the Colorado River.

Our member agencies in the Basin have been leaders in reducing water consumption, and their efforts illustrate both a willingness to address necessary conservation measures and the enactment of leading practices to do so. Many AMWA members, along with other Basin agencies, acted in November 2022 to develop a Memorandum of Understanding to reduce demands on the Colorado River<sup>1</sup> and again in May 2023<sup>2</sup> to agree to a consensus-based system of conservation.

AMWA's member agencies in the Basin have diverse needs; therefore, we encourage the Bureau of Reclamation (Reclamation) to ensure that its development of the post-2026 guidelines and related federal actions on the Colorado River will:

- Prioritize public health and safety;
- Support federal research to operations improvements of water supply forecasts; and
- Provide robust federal support for demand reduction strategies.

Robust federal support for demand reduction strategies should include adequate funding for reduction measures as well as federal research and organization of peer-to-peer information sharing. Reclamation should also consider supporting water agencies by developing criteria for managing facilities, reservoirs, and projects for human health and safety operations, ensuring that agencies have certainty and predictability even under the potential for further reservoir declines.

AMWA supports its member agencies in the region and encourages Reclamation in its efforts to ensure adequate conservation measures are taken to protect critical elevations in Lakes Mead and Powell in the long term. We appreciate the opportunity to comment and ask Reclamation to fully recognize the hydrologic realities of the Colorado River and prioritize public health and safety as it begins the process of developing the post-2026 guidelines and environmental impact statement and continues to take action in the Basin. If you have any questions about this letter, please

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<sup>1</sup>"Memorandum of Understanding by and among Colorado River Basin Municipal and Public Water Providers." November 15, 2022. <https://www.snwa.com/assets/pdf/mou-2022.pdf>

<sup>2</sup>"Lower Basin consensus-based system conservation proposal." May 22, 2023. <https://www.doi.gov/sites/doi.gov/files/lower-basin-plan-letter-5-22-2023.pdf>

Secretary Haaland, Assistant Secretary Trujillo, Deputy Secretary Beaudreau, and Commissioner  
Touton

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contact Jessica Evans, AMWA's Manager of Government Affairs and Sustainability Policy, at  
[evans@amwa.net](mailto:evans@amwa.net).

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Dobbins".

Thomas Dobbins  
Chief Executive Officer

cc: Amanda Erath, Colorado River Post 2026 Program Coordinator, Bureau of Reclamation  
[Crbpost2026@usbr.gov](mailto:Crbpost2026@usbr.gov)