



December 20, 2022

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 for December 2007 record of decision entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

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 supplemental environmental impact statement (SEIS) for December 2007 record of decision entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead. AMWA represents the largest

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

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metropolitan, publicly owned drinking water systems in the nation. Collectively, AMWA members serve more than 156 million people – from Alaska to Puerto Rico – with safe drinking water. 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 to develop a Memorandum of Understanding to reduce demands on the Colorado River.¹

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 SEIS 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 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. 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 develops this SEIS and continues to take actions in the Basin. If you have any questions about this letter, please contact Jessica Evans, AMWA’s Government Affairs Associate at evans@amwa.net.

Sincerely,



Thomas Dobbins
Chief Executive Officer

cc: Dedina Williams, US Bureau of Reclamation
Marcie Bainson, US Bureau of Reclamation

¹ “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>