



DOUGLAS A. DUCEY  
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THOMAS BUSCHATZKE  
Director

ARIZONA DEPARTMENT of WATER RESOURCES  
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August 30, 2022

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

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

The Honorable Camille Calimlim Touton  
Commissioner  
Bureau of Reclamation  
1849 C Street, NW  
Washington, D.C. 20240

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

On August 16, 2022, John Entsminger, General Manager of the Southern Nevada Water Authority, sent you a letter commenting on the current Colorado River crisis. He proposed actions to stabilize the Colorado River system. Many of those actions are bold steps forward and implicate long-standing issues, some of which the Colorado River Basin States and other stakeholders have avoided discussing for decades.

The dire situation we are in requires the types of bold actions that Mr. Entsminger contemplates. I write in support of a comprehensive process to address the adoption of some or all of those actions. They include:

1. Create new beneficial use criteria for Lower Basin water users, eliminating wasteful and antiquated water use practices and uses of water no longer appropriate for this Basin's limited resources.
2. Develop criteria for managing facilities, reservoirs, and projects for health and human safety operations in order to create certainty and predictability in the face of further reservoir declines.

3. Create a basin-wide municipal turf removal program to increase payments to customers where publicly available programs already exist.
4. Expand agricultural efficiency improvements that result in consumptive use reductions.
5. Require seasonal irrigation schedules be implemented and enforced.
6. Invest in water reuse, water recycling, and desalination programs.
7. Purchase additional lands under the Lower Colorado River Multi-Species Conservation Program to prepare for habitat restoration under a significantly modified system.
8. Incentivize conversions to lower water-use crops.
9. Charge each contractor for evaporation and losses in the Lower Basin.
10. Reprioritize Salinity Control Act funding to only those projects that reduce consumptive uses of water, including fallowing agreements and the purchase of marginal lands.
11. Accelerate and fund necessary improvements and modifications at Glen Canyon Dam that will increase predictability and reliability of releases under low reservoir conditions.
12. Prioritize federal funding for drought mitigation to those projects that provide meaningful long-term and permanent reductions in use.
13. Provide proactive and aggressive federal leadership.

No single action will solve the current crisis, and some actions may be more feasible or result in more water savings than others. We cannot afford to do nothing, and we cannot simply rely on the tools we have used to date. We must give due consideration to each of these ideas.

Arizona, like Nevada, has long recognized the need for efficient water management. Between 1957 and 2019, our state's population has grown from 1.1 million residents to 7.2 million residents. Meanwhile, our water use actually decreased from 7.1 million acre-feet per year to 6.9 million acre-feet per year – and our GDI increased from \$13.4 billion to \$299.8 billion at the same time.

While some of that increased water efficiency naturally came with technology improvements, we can also credit our Groundwater Management Act. Since 1980, our more populous areas of the state that have used the most groundwater (active management areas or AMAs) have been subject to a series of management plans with increased conservation requirements in each management period. These conservation requirements apply to all water used, regardless of source, by all groundwater users in the AMAs. As a result, our municipal users reduced their per capita use (in gallons per capita per day) by more than 19 percent between 1985 and 2020. Our agricultural users within the AMAs have reduced their water demand by nearly 23 percent in the same time period.

The laws, rules, and management plans in place since 1980 have also been instrumental in encouraging the use and acceptance of recycled water. 95 percent of the wastewater generated in the Phoenix, Pinal, and Tucson AMAs is recycled to serve beneficial uses.

Even outside the AMAs, we have seen significant efficiency improvement. A 2015 report on Yuma area agriculture found that irrigation diversions had decreased by 15 percent since 1990, and the average irrigation efficiencies were in the 80-85 percent range. These efficiencies were achieved through concerted efforts like construction of concrete-lined ditches, sprinkler irrigation systems, annual laser leveling, and other measures to maximize water efficiency.

In addition to these water efficiency measures throughout the state, Arizona has played a critical role in conserving Colorado River water to protect the system. Since 2014, Arizona has been conserving water to protect elevations in Lake Mead. From 2020 to date, Arizona has left more than 2.6 million acre-feet in Lake Mead – nearly equal to an entire year of Arizona’s 2.8 million-acre-foot apportionment. Of that volume, nearly 1.9 million acre-feet remains in Lake Mead for the benefit of the system, rather than being accounted for as intentionally created surplus that could be released in subsequent years.

Arizona remains willing to collaborate with our partners on the Colorado River at the Department of the Interior, with the other Basin States, with the Tribes, and with Mexico. We recognize that our efforts to date are only the beginning of what needs to be done. The effects of the megadrought, combined with the projections of a significantly drier future, means that everyone who depends on the Colorado River must be prepared to make difficult decisions in order to protect the infrastructure and the River itself. No single user, no single sector, and no single state can do it alone. We look forward to working with you to meet the challenge we face.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Buschatzke". The signature is fluid and cursive, with a large initial "T" and "B".

Thomas Buschatzke  
Director