



March 2, 2026

Submitted electronically

The Honorable Doug Burgum
 Secretary of the Interior
 U.S. Department of the Interior
 Washington, D.C. 20240

CC:
 Bureau of Reclamation
 Attn: BCOO-1000
 P.O. Box 61470
 Boulder City, NV 89006
crbpost2026@usbr.gov

Re: Comments on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

Dear Secretary Burgum:

The Arizona Chamber of Commerce & Industry on behalf of the 40 undersigned organizations respectfully submits this letter regarding the U.S. Department of Interior’s (DOI) Draft Environmental Impact Statement (DEIS) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. The DEIS raises significant concerns and should be withdrawn and revised to address the issues outlined below.

The undersigned write on behalf of Arizona businesses that are critical to the nation’s economy and national defense. These include advanced microchip manufacturers, defense contractors, mineral producers, and other technology firms that support this Administration’s America First

priorities. Our member companies are leading national employers in their respective industries and contribute billions to the nation's GDP. It is from this perspective that we wish to communicate our concerns over the alternatives proposed in the DEIS, which would impose unlawful and disproportionate impacts on Arizona and undermine key national economic priorities.

The Colorado River is foundational to the national economy and people of Central and Southern Arizona. Its supplies support 3 million Arizona jobs, a thriving advanced tech manufacturing industry, and critical mineral and agricultural production. For more than 40 years, Arizona businesses have relied and thrived on Colorado River water delivered through the Central Arizona Project. That long-standing reliability has allowed Arizona to attract unprecedented levels of investment—including the largest foreign greenfield investment in U.S. history¹—driving the reshoring of American manufacturing and strengthening U.S. supply chains consistent with this Administration's related priorities.

Arizona is central to the Administration's efforts to expand domestic semiconductor manufacturing and artificial intelligence infrastructure.² This is evidenced by the Department of Commerce's recent announcement regarding one of the largest trade deals in U.S. history with Taiwan, which was tied directly to continued investment in Arizona's semiconductor manufacturing ecosystem.³

Additionally, this Administration has made increasing American mineral production a national priority⁴ and approximately 70% of U.S. copper production comes from Arizona mines. Achieving these objectives depends upon Arizona's continued ability to sustain advanced manufacturing and mineral production, both of which rely on stable access to Colorado River water. Accordingly, any actions contemplated in the DEIS must be analyzed not only for their true impact on the nation's economy, but also on strategic initiatives that could have impacts on the health and security of the nation.

Arizona's business community has long demonstrated responsible and efficient water management. While Arizona's population has more than doubled over recent decades, overall water use has declined. Businesses and communities have invested in conservation, efficiency, and long-term planning consistent with sound water policy.

Despite this record of stewardship and Arizona's central role in advancing national economic priorities, the DEIS proposes alternatives that would impose disproportionate reductions on Arizona. The DEIS itself acknowledges the potential for "*widespread impacts on social and*

¹ Dylan Butts and Emily Tan, *TSMC is set to expand its \$165 billion U.S. investment – here's what we know*, (Jan. 16, 2026), <https://www.cnbc.com/2026/01/16/tsmcs-arizona-chip-expansion-isnt-done-after-us-investment-cfo.html>.

² *Ensuring a National Policy Framework for Artificial Intelligence*, Exec. Order No. 14365, 90 Fed. Reg. 58499 (Dec. 11, 2025); *Advancing Artificial Intelligence Education for American Youth*, Exec. Order No. 14,277, 90 Fed. Reg. 17519 (Apr. 23, 2025); *Unlocking Cures for Pediatric Cancer With Artificial Intelligence*, Exec. Order No. 14355, 90 Fed. Reg. 48153 (Sept. 30, 2025); *Removing Barriers to American Leadership in Artificial Intelligence*, Exec. Order No. 14179, 90 Fed. Reg. 8741 (Jan. 23, 2025).

³ U.S. DEP'T OF COM., FACT SHEET: RESTORING AMERICAN SEMICONDUCTOR MANUFACTURING LEADERSHIP THROUGH AN AGREEMENT ON TRADE & INVESTMENT WITH TAIWAN (Jan. 15, 2026), <https://www.commerce.gov/news/fact-sheets/2026/01/fact-sheet-restoring-american-semiconductor-manufacturing-leadership>.

⁴ *Immediate Measures To Increase American Mineral Production*, Exec. Order No. 14241, 90 Fed. Reg. 13673 (Mar. 20, 2025).

economic conditions” that may force Arizona municipalities to haul water “*as an alternative to support continued services.*”⁵ Such consequences would undermine decades of settled expectations regarding Colorado River reliability and impair Arizona’s ability to sustain economic growth consistent with national objectives.

These factors considered, Arizona’s business community strongly opposes the proposed DEIS alternatives which arbitrarily and unlawfully impose inequitable cuts upon Arizona while permitting Upper Basin States to increase or maintain their water use.

Critical flaws in the DEIS include, but are not limited to, the following:

- **Failing to Analyze the Socioeconomic Impacts to Arizona and the Nation:** The DEIS fails to meaningfully evaluate the significant economic impacts that would result from the modeled reductions to Arizona’s water supply, including effects on employment, capital investment, and national supply chains.
- **Failing to Analyze Upper Basin Delivery Obligations:** The DEIS endorses increased water use in the Upper Basin while imposing unjustified reductions on Arizona. The Upper Basin’s increased water use occurs even when the Upper Basin has failed to meet its delivery obligations to the Lower Basin—a result that is inconsistent with the structure and intent of the Colorado River Compact of 1922.
- **Failing to Evaluate Reasonable Alternatives:** The proposed range of alternatives fails to evaluate options that would sufficiently share cuts needed to stabilize the Colorado River System among all seven Basin States and Mexico. Such proposals therefore unreasonably and arbitrarily limit the scope of alternatives that may be implemented to accurately project the River and water users that rely on it.

For these reasons, the DEIS does not provide the "hard look" at environmental consequences required by law and ignores a century of settled precedent establishing how water is shared among the Colorado River Basins.

Put simply, the DOI must implement a decision consistent with the Colorado River Compact of 1922, the Law of the River, wise water policy, and this Administration’s policy goals to (1) prevent protracted litigation regarding the deficient DEIS; and (2) ensure Arizona is not unlawfully subjected to disproportionate reductions compared to other Basin States. We therefore respectfully request that the DOI withdraw the DEIS and re-issue alternatives that remedy the deficiencies discussed herein.

We welcome the opportunity to work with the DOI and Bureau of Reclamation to ensure a robust revised DEIS that complies with applicable law and the best interests of Arizona and the nation.

Thank you for your attention to this critical matter.

Sincerely,

⁵ DEIS at T17-35.

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