HBACA
Home Builders Association of Central Arizona

SAHBA
the community builder
Southern Arizona Home Builders Association

SENT VIA ELECTRONIC MAIL

August 15, 2023

Bureau of Reclamation
Attn: Post-2026 (Mail Stop 84-55000)
P.O. Box 25007
Denver, CO 80255

RE: EIS Scoping Process for Post 2026 Operational Guidelines

To Whom it May Concern:

On behalf of the Home Builders Association of Central Arizona (HBACA) and the Southern Arizona Home Builders Association (SAHBA), we submit this letter as our comments during the Public Scoping Process for the Post 2026 Operational Guidelines (the Guidelines). Collectively HBACA and SAHBA represent over 900 member companies doing business throughout Maricopa, Pima and Pinal Counties. These member companies comprise the full spectrum of the planned residential development industry including landowners, land developers, home builders, general contractors, construction trade partners, engineers, planners, suppliers, financial service providers and many more.

This dynamic industry will be responsible for building homes for nearly 30,000 Arizona families this year alone. In addition, it will create tens of thousands of jobs, contributing billions of dollars to the economy. Moreover, and from the standpoint of preserving and augmenting water supplies in the Colorado Basin, housing development that displaces agriculture has allowed Arizona and other Basin states to prosper. In Arizona specifically, the growth in the municipal sector has reduced water use to the point where we use about the same amount of water today as we did in the late 1950's. Healthy economic growth in the municipal sector displaces higher water use activities, generates reclaimed water supplies that can be used to meet certain water needs and creates a tax base that can fund augmentation activities essential to the Colorado Basin.

Our ability to continue meeting the housing needs of our growing population, to generate this substantial economic impact and to continue to produce these water savings is dependent upon adequate and reliable water service. While as an industry we have played an important role in implementing policies and practices to reduce water consumption in our homes and communities, the future of the Central Arizona Project, and thus the Post 2026 Operational Guidelines, are of critical importance to our future success. Should the Guidelines fail to properly ensure there is adequate water for growth, it would be devastating for our state.

With this in mind, we ask that the EIS consider the specific impacts that the Guidelines will have on our housing industry and our economy, and the indirect effects to water supplies that could occur if housing is disrupted and higher water intensive uses are allowed to remain in place. We further ask that the Bureau prioritize in-depth analysis in these areas including consultation with industry experts. It will be imperative to take a comprehensive system-wide approach that accounts for water uses throughout the Upper and Lower Basin in order to gain a full understanding of supply and demand needs. A framework for augmentation and exchange should also be considered. This type of comprehensive analysis would provide opportunities to match resources with beneficial uses in a way that is not in place today.

In conclusion, we understand the significance of the task at hand and value the efforts of the Bureau, Basin states and all stakeholders in developing the Guidelines to properly manage long-term Colorado River Operations. Our organizations are vested stakeholders and are committed to staying engaged to assist and provide expertise throughout the process.

Sincerely,





Spencer Kamps
VP of Legislative Affairs
HBACA

David Godlewski
President/CEO
SAHBA