



**SOUTHERN NEVADA
WATER AUTHORITY**

STATE OF NEVADA



**COLORADO RIVER COMMISSION
OF NEVADA**

March 2, 2026

Via email
c/o crbpost2026@usbr.gov

Bureau of Reclamation
ATTN: Ms. Carly Jerla
BCOO-1000
P.O. Box 61470
Boulder City, NV 89006

Re: State of Nevada's Comments on the Colorado River Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft Environmental Impact Statement

Dear Bureau of Reclamation and Ms. Jerla:

A top priority for Nevada is developing the next set of operating guidelines for the Colorado River. As you know, the current guidelines governing the operations of Lake Powell and Lake Mead only govern the system through the end of September 2026, and the process of formulating new guidelines for implementation is underway. This effort, including the associated National Environmental Policy Act (NEPA) process, is crucial to the future management of the Colorado River system and fundamental to the future health and vitality of the Southwestern United States.

This letter and its accompanying attachments contain the State of Nevada's comments on the Bureau of Reclamation's Draft Environmental Impact Statement on the Colorado River Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (DEIS). But first, we need to make plain the context framing many of our comments. Our water users have sacrificed in the face of the worst Colorado River hydrology on record. Since the onset of drought in 2002, they have reduced their overall Colorado River water consumption by more than 40 percent even as our population grew by more than 875,000 people. And they, unlike so many others, have not ignored the reality facing the basin by making the flimsy argument that our economy cannot prosper while water consumption decreases. Simply put, any alternative evaluated or rule set adopted by Reclamation that fails to sufficiently credit their sacrifice is not acceptable.

Of particular concern is the DEIS's complete omission of compliance with the 1922 Colorado River Compact (the "Compact"), the foundation of the Law of the River, as a basis for the formulation and evaluation of alternatives in the DEIS, and as a basis for evaluating and disclosing the likely environmental consequences of those alternatives. Ignoring the Compact's requirements for deliveries to the Lower Basin States of Arizona, California, and Nevada in times of shortage is not a convenience at Reclamation's disposal when the Colorado River Basin has been mired in the driest period on record for more than 25 years. Yet every single alternative evaluated in the DEIS is presented as if the Compact, approved by each of the Basin States, Congress, and the President of the United States, was written in sand that disappeared long ago.

Additionally, the DEIS seeks to set the direction for future Colorado River operations while failing to consider and carry forward the Lower Basin States Alternative in the NEPA analysis. By cherry picking specific components of that alternative, Reclamation disregarded the integrity and benefits of the comprehensive proposal submitted by the Lower Basin States. And this choice, together with failing to present any Compact-compliant alternative, led Reclamation to ignore wholesale the environmental and social impacts likely to occur in the Upper Division States of Colorado, New Mexico, Utah, and Wyoming under the alternative.

Furthermore, the DEIS's approach to protecting the Glen Canyon Dam river outlet works by reducing releases from Lake Powell—rather than making infrastructure repairs and improvements—is shortsighted and harms Nevada and the Lower Basin States by slashing the water available to our farmers, communities, and economies. These profound impacts can be avoided by some combination of straight-forward engineering fixes, moving water to Lake Powell from upstream reservoirs when necessary, and imposing consumptive use reductions in the Upper Basin.

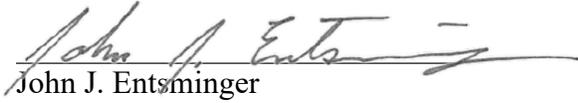
These fundamental issues, further detailed in the enclosed Attachment 1, have been repeatedly communicated to the Bureau of Reclamation and made clear in public discussions. Despite our well-documented objections during the last administration, these serious flaws were incorporated into the DEIS, undermining the negotiation process among the seven Basin States.

Accordingly, Nevada requests that the Bureau of Reclamation collaborate more expansively with the Basin States to prepare a new draft supplemental environmental impact statement analysis that fully complies with NEPA and the Law of the River. Specifically, at a minimum, the updated analysis should include:

- Full consideration of the Lower Basin States Alternative in the alternatives analysis;
- Full consideration of the Nevada Proposed Approach to Short- and Long-term Operations provided with these comments;
- Full consideration of alternatives and impacts relating to reparation of the Glen Canyon Dam river outlet works; and
- Reclamation's planned compliance with the Law of the River in all future analysis.

Thank you for your time and consideration in reviewing these comments. We look forward to working together in the months and years ahead.

Sincerely,



John J. Entsminger
Governor's Representative
State of Nevada
Southern Nevada Water Authority



Eric P. Witkoski
Executive Director
Colorado River Commission of
Nevada

cc:

Dr. Andrea Travnicek, Assistant Secretary of the U.S. Department of the Interior for Water and Science
Scott Cameron, Commissioner, Bureau of Reclamation
J.B. Hamby, Governor's Representative, State of California
Thomas Buschatzke, Governor's Representative, State of Arizona
Rebecca Mitchell, Governor's Representative, State of Colorado
Gene Schawcroft, Governor's Representative, State of Utah
Estevan Lopez, Governor's Representative, State of New Mexico
Brandon Gephard, Governor's Representative, State of Wyoming

Attachments:

Attachment 1: Nevada's DEIS Comments Document
Attachment 2: Nevada List of Errata/Missing Information in DEIS
Attachment 3: SNWA Technical Memorandum—"Comparing the Lower Basin Alternative with the DEIS Alternatives"
Attachment 4: Nevada Proposed Approach to Short- and Long-term Operations
Attachment 5: Index and Compilation of Exhibit Documents referenced in Nevada's Comments