

# Nevada Proposed Approach to Short- and Long-Term Operations

March 2, 2026

## Operation of the Upper Initial Units of the Colorado River Storage Project Act (UIU)

The operation of the upper initial units should be the first line of defense in protecting Lake Powell from dropping below critical elevations (UIU augmented releases). Releases from the initial units between May 1, 2026 and April 30, 2027 (UIU Year 1) should be at least 500 thousand acre-feet (KAF) greater than the scheduled releases. Target elevations should be maintained lower to ensure the water released is not recovered until Lake Powell reaches elevation 3,540. Releases for May 1, 2027 to April 30, 2028 (UIU Year 2) should be dependent upon Lake Powell projected elevations and should Lake Powell be projected to fall below elevation 3,515 during the UIU Year 2, a minimum of 500 kaf should be released with a lower target elevation maintained to ensure the water released is not recovered until Lake Powell reaches elevation 3,540. This logic for UIU year 2 should be applied in each successive year of operations under the proposed approach.

## Release from Lake Powell to Lake Mead

For the purposes of this section, all UIU augmented releases should be modeled as described above with no consideration of “operational neutrality” when making a water year release determination. UIU releases should occur before modifications that reduce the Lake Powell release volume are made. The release for water year 2026 should be maintained at 6.0 million acre feet (MAF) in order to protect critical elevations in Lake Powell. In the event Lake Powell is projected to end water year 2026 above elevation 3,530, additional water should be released through the end of the water year until either 8.5 MAF has been released or Lake Powell is projected to end water year 2026 at or below 3,530, whichever condition is achieved first will dictate the ultimate release volume. For water year 2027, the scheduled release from Lake Powell will be 8.0 MAF if Lake Powell is at or above 3,540 on October 1, 2026. If Lake Powell is below 3,540 on October 1, 2026, the scheduled release from Lake Powell will be 7.0 MAF. Under either starting condition, the release may be adjusted down to 6.0 MAF if Reclamation’s Minimum Probable forecast of hydrologic conditions and UIU augmented releases are insufficient to keep Lake Powell from falling below elevation 3,515 during the water year. If Lake Powell is projected to end the water year above 3,565, then one half of the difference in volume from the projected end of water year storage and Lake Powell’s storage at 3,565 will be added to the release

volume. This process should be iterative from October to April with the final determination for the water year based on the Most Probable projections in the April 24-month study.

For subsequent water years, the water year 2027 release criteria will be the basis for releases.

#### Lower Basin Reductions

Reclamation should consult with the Lower Basin states to implement reductions of 1.25 MAF in 2027 and 2028. For US reductions, these reductions should be satisfied with reduced water orders and/or extinguishing a like quantity of ICS credits for calendar year 2027 and 2028. After calendar year 2028, additional reductions may be necessary along with refinements of criteria for using ICS credits to satisfy reductions. 1.25 MAF of reductions should remain a normal operating condition for the Lower Basin until system conditions have meaningfully improved. Deference should be given to consensus based Lower Basin approvals should such modifications be necessary.

The U.S. Department of State should work with Reclamation, the Basin States, and Mexico to provide parity in reductions and methods for satisfying reductions consistent with US users.

#### Intentionally Created Surplus (ICS) Rules

ICS rules should be extended for the length of the record of decision. This includes annual limits on creation, delivery, and added time to withdraw ICS. The ICS account of each state should be increased by 300 KAF for the first two years of implementation to allow for creation of additional ICS.

#### Additional Actions

Reclamation should draft rules for the exchange of augmented water among existing Section 5 contractors. Water that is not withdrawn by the receiving contractor in the year the exchange occurs should be eligible to be stored in an ICS account under the rules of the ICS program. The evaporation and system assessments will occur if the exchanged water is stored as ICS, but do not occur if delivery of the exchange occurs in same calendar year.

Reclamation should study modifications to the Navajo Indian Irrigation Project Diversion at Navajo Reservoir to allow Navajo Reservoir's operating elevation to fluctuate and release additional water downstream as originally intended in its enacting legislation.

Reclamation should evaluate, and as appropriate, seek new compliance to release additional water from the UIU when operating for their authorized purposes including

protecting downstream infrastructure and meeting Compact requirements. This is not to imply that existing compliance is insufficient to achieve these goals; rather, the proposed approach is intended to be more transparent about the frequency and proliferation of such operations as the records of decision were all adopted at times when neither complying with Compact flows nor protecting downstream infrastructure was a paramount operational objective.

#### Decision Making Process for 2028 and beyond

Recently, hydrologic risk is at an all-time high. Navigating a long-term agreement has been complicated by overcoming challenges associated with near-term risk and uncertainty. After the operations above are implemented for WY 2026-2028 and CY 2027-2028, Reclamation should adopt a decision-making process with a set of limits on the determination of each of the factors above. This decision-making process can function annually to provide input into the AOP process, and should consensus between the Basin States be reached, the bounds are broad enough to adopt operating rules that still function under this NEPA compliance.

- Annual Process
  - Beginning no later than August 15, 2027 (and August 15 of each year thereafter), the Secretary of the Interior (SOI) or his designee will convene the Basin States Principals and technical staff. Each Basin is allowed 15 representatives inclusive of their Principal in consultation meetings.
  - Annual consultations will review hydrology and all water use, conservation, voluntary actions, etc., of each basin.
  - If the Seven States make, and the SOI implements, a consensus recommendation on the major elements listed above for the upcoming water-year, they agree not to pursue litigation during the water-year.
  - The goal of the annual consultation process is for the Seven States to make a consensus recommendation on operations for the water year. In the absence of consensus, each Basin and/or state may submit an operational recommendation to the SOI for his consideration. Such recommendations are due in writing to the SOI no later than September 15. The SOI will make relevant determinations by October 1.
  - The SOI must consider existing law, water use in both basins, and verifiable water conservation activities in both basins when making a decision that is not supported by a consensus proposal or differs from a consensus proposal.

- **Mid-year Consultation Process**
  - Beginning no later than March 15, 2028 (and March 15 of each year thereafter), the SOI or his designee will convene the Basin States Principals and technical staff. Each Basin is allowed 15 representatives inclusive of their Principal in consultation meetings.
  - Mid-year consultations will review hydrology projections to determine if the release from Lake Powell or the UIU should be modified. Mid-year adjustments may be made to the release volume.
  - If mid-year adjustments are determined to be necessary by the SOI, they are limited to reducing the release volume to protect critical infrastructure until such infrastructure is modified to handle low storage operations, or to increase the release to comply with the Law of the River.
  - The goal of the mid-year consultation process is for the Seven States to make a consensus recommendation on a mid-year adjustment. In the absence of consensus, each Basin and/or state may submit an operational recommendation to the SOI for his consideration. Such recommendations are due in writing to the SOI no later than April 1. The SOI will make relevant determinations by April 15.

The SOI must consider existing law, water use in both basins, and water conservation activities in both basins when making a decision that is not supported by a consensus proposal or differs from a consensus proposal. Nevada proposes inclusion of the following elements for inclusion in the approach outlined above:

#### **UIU Augmented Releases**

UIU releases should occur before modifications that reduce the Lake Powell release volume are made.

#### **Releases from Lake Powell to Lake Mead**

Releases should be between 6.0 and 10.0 MAF annually, with operational flexibility to modify the release determination mid-year within these constraints.

#### **Lower Basin Reductions**

Lower Basin reductions will be between 0 and 2.5 MAF. Reductions above 1.25 MAF will be made as needed with strong deference to the agreements among the Lower Basin states on the timing and quantity of reductions necessary above 1.25 MAF.

### **Intentionally Created Surplus**

An additional 5 MAF of ICS space will be analyzed and made available to Lower Basin States and contractors with strong deference to agreements among the Lower Basin States on the timing and availability of additional storage space.