

March 2, 2026

Submission via Email to: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Bureau of Reclamation  
Attn: BCOO-1000  
P.O. Box 61470  
Boulder City, NV 89006

Re: Comments on the Bureau of Reclamation's Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – Draft Environmental Impact Statement

This comment letter is submitted by Waterkeeper Alliance in response to the Bureau of Reclamation's (Reclamation) release of its Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – [Draft Environmental Impact Statement](#). A Notice of Availability of the Draft EIS was published in the Federal Register on January 16, 2026, starting a 45-day public review and comment period. Reclamation also held two virtual public meetings to provide information on the Draft EIS, one of which we attended on February 10, 2026. Thank you for this opportunity to provide a public comment on the Reclamation's Draft EIS in accordance with the requirements of the National Environmental Policy Act (NEPA).

Waterkeeper Alliance is a global movement uniting more than 300 community-based Waterkeeper groups worldwide, who collectively work to protect their local rivers, lakes and shorelines. In the U.S., Waterkeeper Alliance represents the interests of more than 160 U.S. Waterkeeper groups and our more than one million members and supporters who live in riverine and coastal communities across the country, and who work to protect and restore our nation's waterways and coastal waters. Thirty-five local Waterkeeper groups work to protect their waterways and watersheds that lie within the seven Colorado River Basin states and Mexico.

Our comments address the specific guidelines and coordinated reservoir management strategies proposed by Reclamation for operations of Lake Powell and Lake Mead through their full operating ranges to take effect when the current operating guidelines expire in 2026. It is our understanding that Reclamation intends the duration of these guidelines and management strategies to extend for the same duration as the 2007 Interim Guidelines (approximately 20 years), but to be interim in nature to provide the opportunity for ongoing efforts toward achieving consensus among various Basin entities regarding appropriate post-2026 operations.

Reclamation's Draft EIS fails to fully evaluate the direct, indirect and cumulative effects of the operational alternatives that it proposes. In addition, Reclamation acknowledges that there may be insurmountable legal challenges with implementing three of the five alternatives which the Draft EIS evaluates because those alternatives would not comply with the "laws, contracts, agreements and other authorities that are part of the Colorado River legal and contractual framework referred to as Law of the River." (Appendix C, p. C-3 - C-4). Finally, the two remaining alternatives examined in the Draft EIS: the No Action Alternative and the Basic

Coordination Alternative, are likely to result in some of the worst outcomes for Lakes Powell and Mead in light of predictions for significantly declining flows and resulting reservoir elevations over the next 1-2 years.

In light of the above, Waterkeeper Alliance strongly recommends that Reclamation prepare a supplemental or programmatic environmental impact assessment that will more fully inform the consideration of a wide range of alternatives for management of a Colorado River faced with increasing temperatures and declining flows into the future. After decades of overallocation, accelerating climate impacts, and shrinking supplies, the Colorado River Basin can no longer sustain business-as-usual water management.

The Colorado River provides drinking water for **40 million people**, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems.

But the Basin is facing:

- Record-low reservoir levels
- Increasing salinity and pollution risks
- Collapsing aquatic habitats
- Rising temperatures and reduced snowpack
- Growing threats to safe, reliable water supplies

The Draft EIS must reflect the reality of climate-driven water scarcity and prioritize **clean water protections, ecosystem health, and equitable solutions**, not simply divide up a shrinking supply.

The Draft EIS which Reclamation has proposed is inadequate to address the crisis that we face. We call on the Bureau to propose a course of action in its DEIS that will assure a future that protects the Colorado River, not one that entrenches overuse and environmental decline.

## **Recommendations**

Reclamation must strengthen the Draft EIS to ensure it is based on the realities of climate change and realistic supply projections with the goal of protecting water quality and reducing pollution impacts as flows decline. The urgent task before Reclamation is to prevent further ecological collapse in the Colorado River Delta and Basin tributaries by prioritizing demand reduction and conservation over unsustainable allocations.

Although the Draft EIS outlines several possible approaches, it does not clearly identify which approach is its “preferred alternative.” If Reclamation does not include its “preferred alternative” in its Draft EIS and waits to do so in its final action, the public will have no meaningful opportunity to comment on the actual proposal the agency recommends.

Therefore, we urge Reclamation to put forward its “preferred alternative” in a Supplemental or Programmatic EIS in order to give Tribes, impacted communities, and the public a meaningful chance to comment on its recommendation before a final decision is made.

## **Conclusion**

The Colorado River’s future depends on bold action, not incremental adjustments. We need a management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to address the full reality of climate-driven water scarcity and the urgent need to protect water quality, ecosystems, and Basin communities.

In sum, we strongly recommend that the Bureau of Reclamation significantly strengthen the Post-2026 Colorado River Basin environmental impact analysis, through publication of either a Supplemental EIS or a Programmatic EIS, to proactively address the crisis that we face, and ensure that the public has a full opportunity to comment on its revised proposal before issuing any final decision.

The Colorado River is already overallocated and shrinking. Waterkeeper Alliance urges Reclamation to chart a path forward for the Colorado River that prioritizes long-term sustainability, meaningful Tribal consultation, and enforceable reductions in demand, not simply propose new ways to divide a declining supply.

Thank you for this opportunity to share our concerns and recommendations. We look forward to reviewing a revised and robust Supplemental or Programmatic EIS which fully addresses the issues raised in these comments, which are of critical importance to the future of the Colorado River ecosystem.

Sincerely,

Waterkeeper Alliance