BUREAU OF RECLAMATION

Scoping Report for Post-2026 Colorado River Reservoir Operations

Upper and Lower Colorado Basin Regions

U.S. Department of the Interior

October 2023

Mission Statements

The Department of the Interior (DOI) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people, provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people, and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Front Cover: Glen Canyon Dam (Left) and Hoover Dam (Right). Bureau of Reclamation.

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Acronyms and Abbreviations

2007 Interim Guidelines	December 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead
AFY	acre-feet per year
Basin	Colorado River Basin
CAP	Central Arizona Project
CEQ	Council on Environmental Quality
CRMMS	Colorado River Mid-term Modeling System
CRSS	Colorado River Simulation System
DCP	Drought Contingency Plan
DROA	Drought Response Operations Agreement
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
FRN	*Federal Register* Notice
GCM	general circulation model
HFE	high flow experiment
IBWC	International Boundary and Water Commission
ICS	intentionally created surplus
LTEMP	Long-term Experimental and Management Plan
MDT	Mountain Daylight Time
NEPA	National Environmental Policy Act
NGO	nongovernmental organization
NOI	notice of intent
NPS	National Park Service
Post-2026 process	Post-2026 Colorado River Reservoir Operational Guidelines and Strategies for Lake Powell and Lake Mead Environmental Impact Statement / Post-2026 Colorado River Reservoir Operations
Reclamation	Bureau of Reclamation
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WAPA	Western Area Power Administration

Executive Summary

This scoping summary was prepared to document the scoping process for the Post-2026 Colorado River Reservoir Operations (Post-2026 process). As several important reservoir and water management decisional documents and agreements that govern operation of Colorado River facilities and management of Colorado River water are scheduled to expire at the end of 2026, the Post-2026 process has been initiated to develop successor domestic Colorado River operational guidelines and strategies for Lake Powell and Lake Mead.

On June 16, 2023, the Bureau of Reclamation (Reclamation) published a Notice of Intent (NOI) to prepare an environmental impact statement (EIS) in the *Federal Register* (*Federal Register* 88:39455–39458; Appendix A), formally initiating a 60-day public scoping period. In the NOI, Reclamation requested public scoping comments concerning the scope, content, format, mechanism, and analyses of the specific operational guidelines, strategies, and any other issues that should be considered for Post-2026 operations. Three virtual public scoping webinars were held during the public scoping period. During scoping, Reclamation met with Colorado River Basin (Basin) stakeholders to engage in discussions about the Post-2026 process. In response to the expressed desire of Basin Tribal leaders for Reclamation to be more inclusive in Colorado River decision-making processes, Reclamation established the Federal-Tribes-States Group with the goal of promoting equitable information sharing and discussion among the sovereign governments in the Basin. Reclamation also hosted two educational sessions of the Integrated Technical Education Workgroup created to ensure that Basin partners and stakeholders have a common and accurate understanding of the underlying tools and concepts needed to participate in the development of operating alternatives.

Reclamation received 24,290 scoping submittals during scoping and identified 2,264 comments from those submittals. These submittals were from Tribes; federal, state, and local entities; non-governmental organizations and stakeholders; and individuals. Scoping comments identified a broad range of issues for the Post-2026 process and EIS analysis. Comment themes are summarized in this scoping report and are organized by primary issue topics of the National Environmental Policy Act (NEPA) process, alternatives, and resource analysis. After thorough consideration of the comments received during the scoping period, Reclamation identified 10 primary public comment themes for the Post-2026 process:

- Supply and demand imbalance
- Holistic approach and sustainable solutions
- Scope of federal action
- Terms of the guidelines
- Roles of Upper and Lower Basins
- Operation strategies
- Tribal water rights
- Conservation and storage programs
- Augmentation
- Parallel processes and programs

Reclamation considered the information and comments received during the scoping period in the development of the anticipated purpose and need and preliminary assessment of the proposed federal action. Provided in full in Chapter 5, the proposed federal action and purpose and need reflect the Department's intent to develop a robust set of operating guidelines for Lake Powell and Lake Mead that provide for the sustainable management of the Colorado River system and its resources under a wide range of potential future system conditions due to a changing climate. The Post-2026 process is a multi-year NEPA process that will identify a range of alternatives and determine operations for Lake Powell and Lake Mead and other water management actions, potentially for decades into the future. Work on the draft EIS is anticipated to begin in fall 2023. The alternatives development phase of the process will begin immediately following issuance of this scoping report and will continue through spring 2024. Additional details on the alternatives development phase will be available on Reclamation's website. Reclamation has developed state-of-the-art web-based tools to encourage and facilitate stakeholder collaboration during this phase and intends to deploy these tools in the early stages of this phase in the fall.

The completed draft EIS is anticipated by the end of 2024 and will include a public comment period. The Post-2026 process must be concluded before the development of the 2027 Annual Operating Plan for Colorado River Reservoirs (anticipated to begin in mid-2026). Reclamation anticipates a final EIS will be available in late 2025, followed by a Record of Decision in early 2026.

Chapter 1 Introduction

This scoping report was prepared to document the scoping process for the Post-2026 Colorado River Reservoir Operations (Post-2026 process). As several important reservoir and water management decisional documents and agreements that govern operation of Colorado River facilities and management of Colorado River water are scheduled to expire at the end of 2026, the Post-2026 process has been initiated to develop successor domestic Colorado River operational guidelines and strategies for Lake Powell and Lake Mead.

This scoping report summarizes all public comments received during the scoping period (June 16, 2023, to August 15, 2023). Public input received during scoping will inform the National Environmental Policy Act (NEPA) environmental impact statement (EIS) analysis, including the identification of stakeholder concerns, analysis issues, and alternatives development. All public comments received are retained in the administrative record. Public comments are available for public viewing in an accessible format on the project website.

1.1 Background

The Colorado River Basin (Basin) provides essential water supplies to approximately 40 million people, nearly 5.5 million acres of agricultural lands, and habitat for ecological resources across the Southwestern United States and Northwestern Mexico. Declining Colorado River water supplies, coupled with record-low runoff conditions, are contributing to the prolonged drought in the Colorado River Basin, resulting in historically low reservoir levels at Lake Powell and Lake Mead.

Several reservoir and water management decisional documents and agreements that govern the operation of Colorado River facilities and management of the Colorado River are scheduled to expire at the end of 2026. These include the December 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines), the 2019 Drought Contingency Plans, as well as international agreements between the United States and Mexico pursuant to the United States-Mexico Treaty on Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande. The Bureau of Reclamation (Reclamation), as directed by the Secretary of the Interior, is developing successor domestic agreements for the continued operation of Lake Powell and Lake Mead (Post-2026 operations).

Chapter 2 Scoping Process

On June 16, 2023, Reclamation published a *Federal Register* Notice (FRN) formally initiating the process to prepare an EIS and requesting public comments concerning the scope of the specific operational guidelines, strategies, and any other issues that should be considered for Post-2026 operations. The FRN announced a 60-day public comment period and three virtual, public scoping webinars.

2.1 Advertising of Public Scoping Webinars

Reclamation notified interested parties of the notice of intent (NOI) (Appendix A) and scoping comment period through an email notification to the project mailing list (2,480 recipients), and through a press release on June 16, 2023 (Table 1). The email notified recipients of the NOI, scoping period, and three public webinars. The press release was posted on the project website. The scoping notice is presented in Appendix B.

Table 1. Scoping Period Notification Methods and Publication Dates

Notification Item	Method and Date
NOI	*Federal Register*, June 16, 2023 Project website, June 16, 2023
Email notification	Project mailing list, June 16, 2023
Press release	Project website, June 16, 2023

2.2 Public Scoping Webinars

Three virtual public webinars were held during the scoping period. The dates of the scoping meetings were announced in the June 16, 2023, FRN and were advertised via a news release. Reclamation also announced the scoping period through an email to the project mailing list. Table 2 provides a summary of the dates, times, and meeting attendance of the webinars. The webinars included an opening statement, a presentation that summarized the operational setting and hydrologic conditions, and system responses that will inform the EIS analysis, purpose, and content of the FRN, information on the EIS process schedule, details on how to submit scoping comments, and the types of scoping input sought by Reclamation. The webinars also included opportunities to for the public to ask clarifying questions and provide verbal comments. The webinars were available in Spanish through live interpretation. The webinars were recorded and published on the project website: https://www.usbr.gov/ColoradoRiverBasin/post2026/scoping/index.html. Materials presented at the scoping meetings are included in Appendix C.

Table 2. Public Scoping Meeting Dates, Locations and Attendance

Meeting Format	Meeting Date	Meeting Time	Number of Attendees
Virtual (Zoom) webinar	Monday, July 17, 2023	1:00 p.m. to 2:00 p.m. (Mountain Daylight Time [MDT])	185
Virtual (Zoom) webinar	Tuesday, July 18, 2023	10:00 a.m. to 11:00 a.m. (MDT)	112
Virtual (Zoom) webinar	Monday, July 24, 2023	6:00 p.m. to 7:00 p.m. (MDT)	66

2.3 Opportunities for Scoping Comments

The public was directed to submit comments via email to crbpost2026@usbr.gov; via webform linked on the project website; via the project telephone line (602) 789-3889; or provide oral comments at the public webinars. Handwritten comments were directed to be sent to: Bureau of Reclamation Attn: Post-2026 (Mail Stop 84–55000), P.O. Box 25007, Denver, CO 80225.

2.4 Cooperating Agency Coordination

Cooperating agencies are federal agencies that have jurisdiction by law or special expertise with respect to any environmental impact involved in the project or a project alternative.
The International Boundary and Water Commission, National Park Service (NPS), U.S. Fish and Wildlife Service (USFWS), Western Area Power Administration (WAPA), and the Bureau of Indian Affairs are serving as cooperating agencies for the Post-2026 process. In addition to the cooperating agencies, the U.S. Geological Survey (USGS) is acting as a participating agency and will provide technical expertise, including resource modeling support.

2.5 Basin Partner and Stakeholder Engagement During Scoping

Reclamation is committed to designing and implementing a stakeholder process that is inclusive, transparent, and encourages meaningful engagement with our Basin partners throughout the Post-2026 process. During scoping, Reclamation met with several groups of Basin partners and stakeholders to discuss the process.

In response to the expressed desire of Basin Tribal leaders for Reclamation to be more inclusive in Colorado River decision-making processes, and after thorough dialogue with both Basin State and Tribal leaders, Reclamation established the Federal-Tribes-States Group with the goal promoting equitable information sharing and discussion among the sovereign governments in the Basin. This group was convened and held its initial kick-off meeting during the scoping period. Reclamation is committed to continued engagement with this group throughout the process. However, the formation of this new group will not replace independent consultations with Reclamation and the

Department for either the Basin Tribes or the Basin States. In particular, Reclamation anticipates several opportunities for government-to-government consultations with Tribal entities having entitlements to or contracts for Colorado River water, and with those that may be affected by or have interests in the proposed federal action.

In furtherance of Reclamation's commitment to stakeholder technical education, technical outreach, and timely access to relevant technical information, two sessions of the Integrated Technical Education Workgroup were held during the scoping period. This partner and stakeholder workgroup was developed in December 2022 to ensure that Basin partners and stakeholders have a common and accurate understanding of the underlying tools and concepts needed to participate in the development of operating alternatives.

As the Post-2026 process continues, Reclamation will continue to offer ample opportunities for Basin partner, stakeholder, the public engagement in the process.

Chapter 3 Comment Collection and Analysis

The overall goal for scoping comment collection and analysis is to ensure that all scoping comment submittals are tracked and considered in the development of the issues to be addressed in the EIS analysis. The comment analysis process consists of reading, and coding comments using a comment coding structure, interpreting and analyzing the comments to identify issues and themes, and preparing comment summaries.

Four phases in the comment analysis process were used to analyze comments received during public scoping: 1) develop an issue coding structure, 2) import and organize all submittal content in a comment database, 3) carefully read each submittal and assign codes to comments, and 4) prepare this narrative report of those analysis results. It is important to note that the comment analysis process is not considered a vote; all comments were treated equally and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors.

3.1 Development of the Coding Structure

The first phase of the analysis process was to develop a coding structure to thematically sort comments into logical categories that represent issues and concerns related to the Proposed Action, potential issues, and NEPA process. The coding structure was developed by reviewing the range of issues uncovered during background research and internal scoping; it evolved as submittals were reviewed. Chapter 4 (Table 6) shows the coding structure used to categorize comments received during public scoping.

3.2 Database Analysis

The second phase of the analysis process involved developing an electronic comment analysis and reporting database and creating submittal records for each submittal received. Letters submitted during the scoping period were entered into the database, and then reviewed to ensure all comment text and commenter information were correctly captured. The commenter information and comment text for hand-delivered and mailed letters were entered into the database manually.

Each submittal was recorded in the database where it was assigned a unique number and one of the following letter types:

- **Unique** submittals with unique content
- **Form Letter** submittals from multiple entities or individuals containing identical or similar content.
- **Form Plus** letters that have additional unique content in addition to the form letter content.

Letter submissions were then labeled with a commenter type code that indicated the entity from which it was received. Submittals that included only a person's name and any address information were coded as having been received from an individual. If an affiliation with a government (federal, state, local, or Tribe), or non-government organization was included in the commenter information

of a submittal, the submittal record was assigned to the corresponding commenter type category. The submittal mode was also identified for each letter submittal (e.g., email).

The content of the submittals was then filtered using various database queries and by reading through submittal text to identify potential form letters and form plus submittals. The content of the form letters was treated as one single comment submission; however, Reclamation tracked the total number of form letters received (see Chapter 4). After the letter submittals were entered into the database, each unique and form plus submittal was read to identify specific comments.

3.3 Identification and Coding of Comments

Each letter submittal was read carefully to identify individual comment statements and assigned a coding category. Although individual comments may present concerns with multiple issues, a single category reflecting the primary concern was assigned. The primary purpose of comment coding is to organize comments by resource to facilitate review by Reclamation resources specialists and *is not* to estimate the volume of comments received regarding a particular resource.

3.4 Preparation of Scoping Report

The fourth and final phase included identifying public comment themes and preparing this narrative report. The intent of this report is to provide representative theme summaries that capture all major concerns expressed during the scoping period. Chapter 4, Summary of Comment Submittals, summarizes the results of the comment processing and the comment themes.

Chapter 4 Summary of Comment Submittals

Reclamation received 24,290 letter submissions (unique, form letter [Appendix D], form plus, and duplicate letter submissions) during the public scoping period, consisting of 2,264 coded comments (Appendix E). Table 3 provides information on the affiliation of letter submissions and the number of senders. The majority (22,688; 99%) of senders were individuals (see Table 3).

Table 3. Summary of Sender Affiliation Type

Affiliation	Number of Senders
Tribes	19
Federal, state, and local entities	73
Nongovernmental organizations and stakeholders	72
Individuals	22,688
Total	**22,852**

Note: The total number of senders does not equal the total number of letter submittals as more than one sender may be affiliated with a submittal, and duplicate submittals were also received.

Table 4 lists the specific Tribes; federal, state, and local entities; and nongovernmental organizations (NGOs) and stakeholders that submitted letters during the scoping period. Joint entity submissions are also listed in Table 4.

Table 4. Sender Affiliations

Tribes	
Colorado River Indian Tribes	Pascua Yaqui Tribe
Gila River Indian Community	Quechan Indian Tribe
Havasupai Tribe	San Luis Rey Indian Water Authority
Hopi Tribe	Southern Ute Indian Tribe
Hualapai Indian Tribe	Tohono O'odham Nation
Jicarilla Apache Nation	Ute Mountain Ute Tribe
Navajo Nation	Ute Indian Tribe
Paiute Indian Tribe of Utah	Yavapai-Apache Nation
Federal, State, and Local Entities	
Arizona Department of Water Resources	National Park Service
Arizona Game and Fish Department	Nebraska Department of Natural Resources
Arizona Power Authority	North Gila Valley Irrigation and Drainage District
Arizona Water Company	Pinal County

Bard Water District	Rio Blanco Water Conservancy District
California Department of Water Resources	Salt River Project
Central Arizona Project	Salton Sea Authority
Central Arizona Water Conservation District	San Diego County Water Authority
Central Utah Water Conservancy District	San Juan Water Commission
City of Buckeye	Southern Nevada Water Authority
City of Casa Grande	Southwestern Water Conservation District
City of Escondido and Vista Irrigation District	State of Arizona
City of Goodyear	State of California
City of Maricopa	State of Colorado
City of Phoenix	State of Nevada
City of Surprise	State of Nevada Colorado River Commission
Colorado River Authority of Utah	State of New Mexico
Colorado River District	State of Utah
Colorado Water Conservation Board, Department of Natural Resources	State of Wyoming
Dolores Water Conservancy District	Town of Marana
EPCOR Utilities	Town of Queen Creek
Environmental Protection Agency Region IX	Town of Superior
Front Range Water Council	Unit B Irrigation and Drainage Districts
Gilbert Arizona Public Works	Upper Colorado River Commission
Helix Water District	U.S. Fish and Wildlife Service
Imperial Irrigation District	Washington County Water Conservation District
Imperial Valley Water (IVH20)	Water Utility of Greater Tonopah (Global Water Resources)
Lake Havasu City	Western Area Power Administration
Metropolitan Water District of Southern California	Wellton-Mohawk Irrigation and Drainage District
Lake Havasu City	Yuma Mesa Irrigation and Drainage District
Metropolitan Water District of Southern California	Yuma Irrigation District
Mohave County Water Authority	
Non-governmental Organizations and Stakeholders	
Agess, Inc.	Living Rivers

American Rivers	National Audubon Society
American Whitewater	National Parks Conservation Association
Amwua One for Water	National Wildlife Federation
Arizona Farm Bureau Federation	Natural Resources Defense Council
Arizona Municipal Power Users Association	Oceanforesters
Arizona State University	Pacific Institute
Association of Metropolitan Water Agencies	Pronatura Noroeste
BlueRibbon Coalition	Redford Center
Bonneville Environmental Foundation	Restauremos el Colorado
Bullhead City Chamber of Commerce	Returning Rapids Project
Center for Biological Diversity	River Runners for Wilderness
Colorado River Energy Distributors Association	Save the Colorado
Comite Civico del Valle	Sierra Club Grand Canyon
Cruz Farm	Sonoran Institute
Dolores River Boating Advocates	Sonoran Wines
Environmental Defense Fund	Southern Arizona Home Builders Association
Front Range Water Council	Southwest Hydrology and Hydraulics, LLC
Geothermal Worldwide, Inc.	Stout Research Center
Getches-Wilkinson Center for Natural Resources, Energy, and the Environment, Colorado School of Law	The Gadsden Company, LLC
Glen Canyon Institute	The EcoMedia Compass
Grand Canyon Private Boaters' Association	The Nature Conservancy
Grand Canyon River Guides, Inc.	Theodore Roosevelt Conservation Partnership
Grand Canyon State Electric Cooperative Association	TRANSOCEANIC LLC
Grand Canyon Trust	Trout Unlimited, Angler Conservation Program
Greater Kingman Area Chamber of Commerce	University of Arizona
Grand Canyon Wildlands Council	University of New Mexico
Greater Flagstaff Chamber of Commerce	University of Nevada, Reno
Great Basin Water Network	Utah Rivers Council
Home Builders Association of Central Arizona	Waterkeeper Alliance
Imperial County Farm Bureau	Western Resource Advocates

Irrigation and Electrical Districts Association of Arizona, Inc.	Yampa-White-Green Basin Roundtable
Lahontan Audubon Society	Yuma County Water Users' Association
Las Vegas Water Defender	
Joint Entity Submissions	
Academic Submission: University of Nevada, Reno, Arizona State University	Living Rivers Submission: Living Rivers and Colorado Riverkeeper, Center for Biological Diversity, Great Basin Water Network, River Runners for Wilderness, Las Vegas Water Defender, Save The Colorado, Glen Canyon Institute, Utah Rivers Council, Waterkeeper Alliance
Arizona Home Builders Associations Submission: Home Builders Association of Central Arizona, Southern Arizona Home Builders Association	Lower Basin States Submission: Arizona, California, Nevada
Arizona Irrigation and Power Associations Submission: Irrigation and Electrical Districts' Association, Arizona Municipal Power Users' Association, Grand Canyon State Electric Association	Lower Basin Water Agencies Submission: Southern Nevada Water Authority, Central Arizona Water Conservation District, The Metropolitan Water District of Southern California
Arizona Re-consultation Committee Submission: Arizona Water Company, City of Buckeye, City of Surprise, EPCOR Inc, Town of Marana, Town of Queen Creek, Water Utility of Greater Tonopah (Global Water Resources), City of Casa Grande, City of Maricopa, Pinal County, Town of Superior	Non-governmental Organizations Submission: The Nature Conservancy, Western Resource Advocates, Environmental Defense Fund, National Audubon Society, Theodore Roosevelt Conservation Partnership, American Rivers, Trout Unlimited
Chambers of Commerce Submission: The Gadsden Company, LLC; Sonoran Wines; Cruz Farm; Greater Kingman Area Chamber of Commerce; Bullhead City Chamber of Commerce; Greater Flagstaff Chamber of Commerce	Pacific Institute Submission: Pacific Institute, Natural Resources Defense Council
City and Irrigation District Submission: City of Escondido and Vista Irrigation District	Raise the River Submission: Pronatura Noroeste, National Audubon Society, The Redford Center, Restauremos el Colorado, The Nature Conservancy, Sonoran Institute
Glen Canyon Institute Submission: Glen Canyon Institute, Utah Rivers Council, Returning Rapids Projects, Great Basin Water Network, Living Rivers, National Parks Conservation Association	Seven Basin States Submission: Arizona, California, Colorado, Nevada, New Mexico, Utah, and Wyoming

Irrigation Districts Submission: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield Irrigation and Drainage District, New Magma Irrigation and Drainage District, Queen Creek Irrigation District, San Carlos Irrigation and Drainage District	Upper Basin Dialogue Participants Submission: Southern Ute Indian Tribe, Ute Mountain Ute Tribe, Paiute Indian Tribe of Utah, Ute Mountain Ute Tribe, Jicarilla Apache Nation, The Nature Conservancy, Western Resource Advocates, Environmental Defense Fund, National Audubon Society, Theodore Roosevelt Conservation Partnership, American Rivers, Trout Unlimited, Sonoran Institute, Living Rivers, national Wildlife Federation
Irrigation Districts Submission: Wellton-Mohawk Irrigation and Drainage District, Yuma Mesa Irrigation and Drainage District, Yuma Irrigation District, North Gila Valley Irrigation and Drainage District	Upper Colorado River Commission Submission: Colorado, New Mexico, Utah, and Wyoming
Joint Farm Submission: Avalex, Mike Abatti Farms, LLC, MADJAC Farms Inc.	

Of the 24,290 letters that were received during the scoping period, 21,658 (89.2%) were form letters (see Appendix D), 1,256 (5.2%) were form plus letters, 318 (1.3%) were unique letters, and 1,058 (4.3%) were duplicate letters (Table 5).

Table 5. Submittals by Type

Type	Number of Submittals	Percentage of Total Submittals
Form Letter	21,658	89.20
Form Plus	1,256	5.20
Unique	318	1.30
Duplicate	1,058	4.30
Total	**24,290**	**100%**

From the 24,290 letter submittals, 2,264 comments were identified. Table 6 lists the coding structure themes, the number of comments coded to each theme, and the percentage of those codes out of the total comments. Section 4.1 summarizes the comments for each comment theme.

Table 6. Comment Coding Summary

	Number of Comments	Percentage of Total Comments
NEPA Process, Laws, and Regulations		
Consultation and Coordination – General	21	0.93%

	Number of Comments	Percentage of Total Comments
Consultation and Coordination – Biology/Endangered Species Act	19	0.84%
Consultation and Coordination - Tribal	59	2.61%
Cooperating Agencies	4	0.18%
Cumulative Effects	10	0.44%
Data Sources	16	0.71%
Decision Process	40	1.77%
Mitigation	17	0.75%
Policy and governance	55	2.43%
Public and Stakeholder Involvement	20	0.88%
Purpose and Need	37	1.63%
Scope	88	3.89%
Water with Mexico	40	1.77%
Alternatives		
Alternatives- Boating	71	3.15%
Alternatives- Ecosystem	109	4.81%
Alternatives- General	52	2.30%
Alternatives- No Action	13	0.57%
Alternatives- One Dam	116	5.12%
Alternatives- Operations	75	3.31%
Alternatives- Shortages	87	3.84%
Alternatives- Storage	66	2.92%
Alternatives- Surplus	7	0.31%
Alternatives- Water Source	31	1.37%
Alternatives Development Process	17	0.75%
Resource Analysis Issues		
Air Quality	8	0.35%
Baaj Nwaavjo National Monument	2	0.09%
Climate Change and Greenhouse Gas Emissions	70	3.09%
Cultural and Tribal Resources	104	4.59%
Energy	25	1.10%

	Number of Comments	Percentage of Total Comments
Environmental Justice	9	0.40%
Human Health and Safety	15	0.66%
Recreation - Boating	50	2.21%
Recreation - General	47	2.08%
Recreation - Sport Fishing	1	0.04%
Resource Analysis	8	0.35%
Sedimentation and Geology	5	0.22%
Socioeconomics	64	2.83%
Sustainable, Reliable, and Adaptive Management	176	7.77%
Vegetation	18	0.80%
Water Conservation and Drought	159	7.02%
Water Management and Modeling	99	4.37%
Water Quality	25	1.10%
Water Quantity	36	1.59%
Water Rights and Agreements	55	2.43%
Wildlife	218	9.63%
Total	**2,264**	**100%**

4.1 Key Themes

Several common themes emerged during the comment review process. Of them, there was one overarching theme that stood out – the concept of "more." Overall, public scoping input called for the next guidelines to be more robust, innovative, flexible, and adaptive, and should engage more Basin water users through expanded opportunities. This overarching theme of "more" was the underlying tenant used to develop the purpose and need for the proposed federal action described further in Chapter 5. Other key themes gleaned from comment review included the following:

- Supply and Demand Imbalance
- Holistic Approach and Sustainable Solutions
- Scope of Federal Action
- Term of the Guidelines
- Roles of Upper and Lower Basins
- Operational Strategies

- Tribal Water Rights
- Conservation and Storage Programs
- Augmentation
- Parallel Processes and Programs

This chapter discusses the scoping input received based on the comment coding structure (Table 6 above) used to organize comments as they were received. The key themes identified above, among others, are reflected within this coding structure and examples are provided for context.

4.2 NEPA Process, Laws, and Regulations

4.2.1 Consultation and Coordination

4.2.1.1 General

Commenters emphasized the importance of coordinating with federal agencies (including cooperating agencies), Basin States, Basin Tribes, NGOs, Mexico, water users, and municipal water providers. Some commenters emphasized the need for equitable and transparent process (e.g., "Historically, there have been winners and losers when it comes to inclusion and influence on the development of policies and practices for the management of the Colorado River. Colorado River contractors and entitlement holders have not been represented equally in discussions over the use of Colorado River water. Some have been given a great deal of attention, while others have been left out entirely. These disparities between users cannot be made worse in the Post-2026 process. The process must include all water users in both the Lower and Upper Basins, tribes, and Mexico, and must also ensure full and equitable participation"). Numerous comments also expressed individual entities' commitments to participate collaboratively with Reclamation and others in the Basin to identify solutions.

Specific suggestions for effective consultation and coordination included the following:

- "When water users are left out of important discussions, they should be informed of what was discussed, what policies were developed and what actions will be taken, if any."
- "Any alternative must improve cooperation and communication between the Basin States and avoid circumstances which could otherwise form the basis of claims or controversies over interpretation or implementation of the Colorado River Compact and other applicable provisions of the Law of the River."
- "Request that the Secretary consult the Basin States for input on the development of the No Action alternative."
- "Establish as part of the NEPA process working groups around particular areas of expertise and sectors that can assist with the development of the new framework and evolve into standing working groups that guide the framework's implementation… [including:] 1) A water resilience working group that explores strategies that allow municipalities, agriculture, Tribal Nations, and NGOs to enter into voluntary, temporary, and compensated agreements to share water supplies, storage, and infrastructure… 2) A working group that

identifies impacts of reduced Colorado River water use on resources in Mexico and ways to avoid, minimize, or mitigate these impacts. 3) A working group around outreach and engagement strategies that would be dedicated to jointly assessing, implementing, and evaluating public participation and transparency strategies. The goal would be to develop a holistic stakeholder engagement strategy to inform, increase awareness, and engage stakeholders in management planning."

- "Creating a Basin-wide Municipal Sector Committee… in addition to Reclamation's consultation with the Governor's representatives from each Basin State."
- "The Guidelines will not be the sole answer to challenges afflicting the Colorado River Basin. Reinforcing and parallel activities will be critical to support the Basin's overall stability. The Bureau's post-2026 process should anticipate and reinforce parallel processes led by states, agencies, NGOs, Tribes, corporations, municipalities, and others."
- "We strongly suggest that the new EIS be prepared by an integrated team that accesses federal and state (and perhaps university) scientific and operational expertise such that the best available science is used to evaluate alternative reservoir operations policy. Relevant expertise can be found in the state administrative agencies, GCMRC, the staff of the Upper Colorado and San Juan endangered species recovery programs and the Lower Basin MSCP, and the faculty and research staffs of some universities."

4.2.1.2 Biology, Endangered Species, and Section 7

Comments related to coordination with the USFWS on biology and threatened and endangered species issues, including formal consultation under Section 7 of the Endangered Species Act, highlighted the need for robust and adaptive approaches to address protection of critical habitats, instream aquatic life, and off-stream beneficial uses across the Basin. Specific issues commenters mentioned for consideration include the ability of water users to comply with requirements of the Endangered Species Act; impacts to Upper Basin, Grand Canyon, Lower Colorado River (including National Wildlife Refuges), Salton Sea, and Cienega de Santa Clara habitats; impacts of all operations affecting the Lower Basin species; and impacts on the Upper Colorado River Endangered Fish Recovery Program, San Juan River Basin Recovery Implementation Program, and Lower Colorado River Multi-Species Conservation Program. Commenters highlighted the importance of long-term protection of all Colorado River Basin associated ecosystems, identifying restoration targets for success and milestones, and providing key information necessary for the USFWS to evaluate the tipping point for recovery of any species protected under the Endangered Species Act within the geography of the EIS. Some commenters also noted there may be a need to update or combine the Biological Opinions for all federal dams and review and potentially update the Biological Opinion for the Multi-Species Conservation Program.

4.2.1.3 Tribal Outreach and Section 106

Many comments emphasized the importance of Tribal involvement in the Post-2026 process, including via government-to-government consultation, inclusion of Tribes as sovereign entities in deliberations along with the Basin States, Section 106 consultation, inclusion of indigenous knowledge in impacts analysis, and inclusion of indigenous knowledge and perspectives in formulating the purpose and need and the scope for the Post-26 process. For example, one comment noted, "The post-2026 Guidelines must recognize the sovereign roles, rights, and interests

of Tribal Nations as fundamental to the fabric and longevity of the Colorado River Basin. It is imperative that Tribal Nations be afforded their rightful role in negotiations and decision-making processes that influence and/or affect their rights, authorities, and interests in the Colorado River supply."

Commenters highlighted the exclusion of Tribes from negotiations related to Colorado River water in the past and called for this to change (e.g., "Many historic laws, compacts, and treaties that form the foundation of Colorado River management were adopted when institutionalized exclusion of some peoples and interests, particularly Tribal sovereigns who have lived in the Basin since time immemorial, was common. Reclamation's process must reverse those inequities and include representatives of Tribal sovereigns with Colorado River water rights, both settled and unsettled").

Several comments also highlighted the need for funding or technical assistance to support access to clean drinking water, infrastructure, and water conservation measures for Tribal communities. Several comments addressed the importance of addressing cultural resource preservation in the development of Post-2026 operational strategies for the Basin.

Specific suggestions for effective consultation and coordination included the following:

- Understand history and integrate indigenous knowledge and worldviews.
    - "As indigenous people, we recognize the inextricable connection to the land and water, which brings a profound sense of balance and responsibility. We eagerly anticipate working collaboratively in the months and years ahead to protect the Colorado River system, honor the ancestral ties, and uphold the rights and well-being of the people, plants, and species that depend on the Colorado River. Acknowledging the historical exclusion of tribes from river management decisions, we emphasize the paramount importance of forging a partnership built on mutual respect, active engagement, and a genuine understanding of the indigenous perspective. By embracing this holistic approach, we can address the challenges at hand, develop sustainable solutions, and ensure the long-term vitality of the Colorado River for ourselves and for future generations to come."
- Facilitate consistent and transparent communication among all sovereigns.
    - "Ensure that there is consistent and transparent communication and consultation among all sovereigns (federal, state, and Tribal Nations) during the NEPA process… It is imperative that Tribal Nations be involved with the federal government and the states in developing sustainable solutions to how the river is managed. We applaud the Bureau for actively initiating this type of communication and consultation by convening a meeting on August 10th in Phoenix to which all seven Basin States and 30 Tribal Nations were invited. This should be the beginning of ongoing 'sovereign to sovereign' engagement as part of the planning process."
- Make materials accessible and provide sufficient time for review and feedback.
    - "President Biden recently ordered that consultations must ensure all applicable information is readily available to consulting parties and that Federal and Tribal officials have adequate time to communicate. Reclamation must then take the Tribal input it receives into account; and provide an explanation of how Tribal input was received, how that Tribal input was addressed, and the reasoning for any instance in

which Tribal suggestions were not incorporated into the Departmental action or any instance where consensus could not be obtained."

- Provide clear and transparent documentation of Tribal engagement and how Tribal input is or is not integrated into decisions.
    - "Provide a summary of government-to-government collaboration and communications with Basin tribes, and the identification of long-term management or operational actions needed to account for unsettled, unresolved, or unfulfilled indigenous rights to Colorado River water."
    - "Thoroughly describe the process and outcome of government-to-government consultation between Reclamation and tribes, including issues that were raised and how those issues were addressed in the development and selection of the proposed alternative and proposed mitigation. Section 2 of the Presidential Memorandum on Uniform Standards for Tribal Consultation… present[s] best practices and consultation policies that call on federal agencies to incorporate tribal treaty and reserved rights into agency decision-making with the goal of co-management and co-stewardship of federal land and water."
- Incorporate lessons learned and best practices.
    - "Draw on lessons learned and best practices from other transboundary river basin commissions."

4.2.2 Cooperating Agencies

Scoping comments included requests and recommendations for cooperating agency involvement from the following entities:

- **Colorado River Energy Distributors Association:** The Colorado River Energy Distributors Association has expressed desire to be a cooperating agency as well as inclusion of the WAPA and the interdisciplinary member responsible for providing hydropower resource impact modeling and analysis. The Colorado River Energy Distributors Association stated they would also provide subject matter experts for the EIS process, specifically analyzing potential impacts and development of alternatives that are involved with public utility and the power grid.
- **National Park Service:** The NPS requested to be closely involved in the development of alternatives for potentially impacted resources, including fish and wildlife, water quality, vegetation, wildlife habitat, geological features, geomorphic processes, cultural, paleontological, visitor experience, recreational and ethnographic resources in the affected national park units. NPS mentioned that as mandated by the Organic Act of 1916, the NPS manages and protects resources in nine parks that collectively contain almost 1,000 miles of river and river-related resources that may be impacted by project alternatives.
- **U.S. Environmental Protection Agency (EPA):** The EPA requested to be a cooperating agency to support Reclamation regarding the identification and analysis of issues to be addressed in the EIS, specifically areas of EPA special expertise and/or jurisdiction by law regarding air and water resources and environmental justice.

4.2.3 Cumulative Effects

Scoping comments included requests for the scope of the EIS to analyze and consider cumulative effects specifically associated with Basin fund impacts, impacts to WAPA's contractual obligations to deliver federal hydropower, financial and societal impacts to electric service customers that includes 53 native tribes, and impacts to transmission grid operations. Comments also mentioned that Reclamation should analyze reasonably foreseeable cumulative effects that include downstream and off-River water bodies and users, the Salton Sea, and existing water conservation obligations that were not analyzed for the 2007 Interim Guidelines.

One comment mentioned that although all communities are affected by and are vulnerable to water shortages, evaluation of prior actions and decisions that have resulted in disproportionate burdens should be prioritized. The commenter recommended detailing all past, present, and future actions that have or will contribute to significant cumulative effects on the communities with environmental justice concerns and acknowledge previous reductions in water supplies. One commenter suggested the EIS analyze the cumulative effects of various water importation schemes, including importing water from the Sea of Cortez, Pacific Ocean, and reuse activities in Tijuana, Mexico in reference to the proposed restoration of the Salton Sea in the absence of Colorado River allocations.

Multiple comments suggested that the EIS analyze the direct, indirect, and cumulative effects to all aquatic resources including but not limited to wetlands, streams, rivers, and vernal pools which may be impacted from changes in hydrology from water diversions and transfers and quantify potential lost aquatic and riparian areas. Commenters would like the EIS to include analysis of impacts to flow regime and stream morphology with an emphasis on the cumulative effects of sediment mobilization, channel complexity, channel maintenance and aquatic habitat availability, all in a cumulative effects scope. One commenter also requested the EIS identify mitigation measures for cumulative impacts.

4.2.4 Data Sources

Commenters submitted scientific studies, conference reports, and presentations from technical workgroups and Colorado River stakeholder groups for consideration in the EIS analysis. Topics in the submitted data sources included:

- Colorado River hydrology and hydroclimatic variability
- Flow-dependent recreation
- Climate change and drought
- Glen Canyon Dam Adaptive Management Program Technical Work Group Meetings transcripts
- Reclamation's 24-month study released in December 2022
- University of Arizona's Institute of the Environment workshop report
- Water and Tribes Initiate October 2020 policy brief
- USGS Colorado River Basin Focus Area Study website

4.2.5 Decision Process

Most comments on the decision process emphasized the importance of providing an inclusive and transparent decision-making process. Comments included specific requests to include all sovereigns including the 30 Basin Tribes; interests in the Upper Basin; Mexico and the Department of State; NGOs; conservation groups; academics; agricultural stakeholders; river recreation stakeholders; diverse waters users; impacted people and entities; Glen Canyon Dam Adaptive Management Program and Adaptive Management Work Group; and all Department of Interior bureaus.

At least one commenter highlighted the unique status of the Basin States and encouraged the Secretary of the Interior to consult with Governors' Representatives from the Basin States to collaborate on the development of alternatives.

At least one commenter called for the public to be more actively involved, for example, via "monthly webinars discussing the status of negotiations, emerging reservoir and river management ideas, and updates regarding impacts analysis, and follow these webinars with opportunities for public comment."

Themes related to how decisions should be made included the:

- Meaningful collaboration
- Meaningful inclusion of Tribes
- Basin States stepping up to seek agreement
- Collaborative development and evaluation of a broad range of alternatives
- Seeking "outcomes that are truly adaptive for all stakeholders"

4.2.6 Mitigation

Commenters asked Reclamation to define mitigations in the EIS, were concerned with environmental mitigations, and wanted Reclamation to include mitigations within each action alternative. Commenters suggested multiple mitigation measures, including encouraging conservation easements, requiring states to update water efficiency measures, taxing heavy water users to fund mitigation, providing incentives to maintain cover crops, funding to restore fallow agricultural fields, facilitating emergency water leasing agreements, and paying for stored water credits.

One commentor noted, "The post-2026 NEPA evaluation should include mitigation and stewardship measures as part of proposed action alternatives to help avoid or minimize impacts to resources critical to the health and ecological integrity of the Colorado River Basin." Some commentors wanted Reclamation to require mitigation: "We urge the BOR to fully assess the environmental impacts of its proposed alternatives and require mitigation for unavoidable harmful environmental impacts." Commenters also requested that Reclamation describe ongoing mitigation, and one of these commentors specifically wanted Reclamation to provide reports on mitigation programs funded by hydroelectric power.

One commenter suggested disclosing the parties that would be responsible for avoiding, minimizing, and mitigating adverse impacts. Another commenter requested that Reclamation identify

opportunities to avoid and minimize impacts through changes to project elements or mitigation, including working with other entities that may have authority or responsibility for these measures. Although some mitigation measures may be outside the jurisdiction of Reclamation, the commenter asked that they be described in the EIS to serve as an alert to other agencies or officials who can implement these extra measures.

4.2.7 Policy and Governance

Commenters listed existing laws and policies that Reclamation should comply with or use as the foundation when creating the Post-2026 operations, including the following: Administrative Procedure Act; National Environmental Policy Act; Law of the River, anchored by the 1922 Colorado River Compact and the 1948 Upper Colorado River Basin Compact together with the 1944 Treaty with Mexico; Grand Canyon Protection Act; Colorado River Management Plan for Grand Canyon National Park; Endangered Species Act; National Historic Preservation Act; National Park Service Organic Act of 1916; and the Long-term Experimental and Management Plan (LTEMP).

Commenters expressed the importance of leveraging the development of the Post-2026 operations with current and future parallel planning processes. Reclamation "should anticipate and reinforce parallel processes led by states, agencies, NGOs, Tribes, and others" such as "such as extension of elements of the Drought Contingency Plan, the successor to Minute 323, durable conservation programs, investment in restoration and protection of watershed health, and other tools" to "to craft a resilient and sustainable future for the Basin."

A few comments focused on the role that Reclamation could play in protecting the Grand Canyon. The Post-2026 process should be "sustainable, holistic, and environmentally responsible" which would also "preserve the values of the Colorado River through Grand Canyon." However, the process "should not interfere with the upcoming Environmental Assessment on warm water exotic species in Grand Canyon, nor with its implementation." Additionally, a "more comprehensive review of LTEMP seems warranted."

Commenters had varied opinions on the Colorado River Compact. Several comments expressed that the Colorado River Compact is no longer effective because "when the Colorado River Compact was drawn up in 1922 it overallocated Colorado River Water based on inflated flow levels from an abnormally wet period…. The compact at the time did not include the Upper Basin, nor did it factor water for tribes and Mexico who relied on and resided along the rivers course." Commenters felt that the Colorado River Compact should become "null and void in our current drought situation," "revised to reflect actual conditions in the river," or renegotiated to create a "Lower Basin Compact to address unresolved issues."

Several commenters expressed the opposite view and felt that the Colorado River Compact should be honored, and that Reclamation should not "impair or impede the right of the Upper Basin to consumptively use water available to that Basin." In a similar vein concerning the Law of the River, which is comprised in part by the Colorado River Compact, commenters felt that Reclamation "must adhere to the Law of the River and recognize each State's authority to independently administer and distribute its water resources." One commenter expressed that each State should retain "exclusive authority over the control, appropriation, use, and distribution of water within its borders."

4.2.8 Public and Stakeholder Involvement

Scoping comments provided suggestions for Reclamation to have an administrative process that is equitable and transparent, expressing concerns that stakeholders have not been represented equally in discussions over the use of the Colorado River water, as one commenter stated that some have the "ear of sympathetic government officials, while others struggle to receive an audience." The commenter expressed concerns that stakeholders with low-priority water rights are invited into closed-door negotiations, while others are excluded even as their senior water rights are debated. The commenter also stated that Reclamation "must ensure full input from major water users with compelling and federally protected interests, such as agricultural and military users in the Yuma area." One commenter suggested that Reclamation provide more in-person and virtual meetings at multiple locations in each Basin State and Mexico to ensure a robust review of the NEPA process, and another asked that when stakeholders are unable to participate in or are left out of important discussions and decisions, they must be made aware of what decisions and discussions have occurred, what policies have been developed, and what actions will be taken. Another commenter stated there are opportunities for Reclamation to expand partnerships with other federal agencies and programs, such as the U.S. Department of Agriculture's salinity control program activities, to drive increased conservation.

One commenter suggested that Reclamation assemble an integrated, disciplinary team "to evaluate the impacts on the reliability of the electrical grid associated with reduced or bypassed water releases. The team should include a broad range of industry experts, including WAPA, reliability organizations, grid operators and power suppliers." Additionally, one commenter stated that stakeholders want to be more than informed and feel as if they are being heard and understood. The commenter provided specific suggestion for meaningful engagement for the Post-2026 NEPA process, including the following:

- Provide information, possible considerations, and obstacles in a timely manner to allow the public time to absorb, consider, and provide useful information.
- Maintain the mechanisms for keeping the interested public informed of progress and developments from the NEPA effort in a timely manner.
- Hold consultations, outreach, public meetings, and webinars to provide substantive updates. These should be scheduled at relevant, timely intervals to provide a reasonable opportunity for gaining an understanding of the NEPA analysis.
- Communicate information, developments, and possible responses as they arise to promote transparency.
- Designate Reclamation points of contact for specific groups and individuals to directly discuss possible content, outcomes, and changes to the NEPA analysis as it progresses, and require Reclamation staff to be readily available to all interested stakeholders to encourage iterative discussions and feedback.
- Respond to input and/or demonstrate that the audience has been heard in order to build an inclusive process.

Another commenter suggested that Reclamation develop a sustained public engagement strategy that takes full advantage of online-based and social media platforms (e.g., webinars, virtual, hybrid, and recorded meetings, data hubs, online dashboards, and story maps) to update and educate the public on the NEPA process.

One commenter stated, "Drought Operations in 2022 also served as an example of good outreach by Reclamation to stakeholders, in advance of the action, to allow input to refine the approach" and suggested that the Post-2026 operations do the same. Another commenter mentioned that the Integrated Technical Education Workgroup is an extremely valuable and constructive forum, and that they are looking forward to the release of the shortage allocation tool this fall that Reclamation has informed us is under development.

Lastly, one comment brought forth issues with the NOI and that it did not include key information usually included in a NOI such as a preliminary description of the proposed action, the purpose and need for the proposed action, the alternatives likely to be considered, and a brief summary of anticipated impacts. This commenter then expressed concerns that the "ability to provide responsive comments at this time is constrained by the lack of information and we expressly reserve all rights to comment on specific aspects of the DEIS as it becomes publicly available."

4.2.9 Purpose and Need

Many comments on the purpose and need for the Post-2026 guidelines called for Reclamation to broaden the purpose and need beyond how it was defined in the 2007 Interim Guidelines, given the limitations in the current 2007 guidelines due to ongoing drought conditions in the Basin. Commenters recommended taking a more holistic view of the system to include the integrity and health of the river and its tributaries and incorporating proactive and flexible mechanisms to address changing climate and Basin conditions. Values that commenters indicated they would like to see reflected in the purpose and need included resilience, environmental justice, preserving natural and cultural values in the Basin alongside water management, storage and delivery of water supplies for irrigation, municipal and other beneficial uses; reliable water supply and consistency with Law of the River; maintaining in-stream flows; navigation; conservation of groundwater; protection and restoration of the Colorado River ecosystem in the Grand Canyon; reductions in water use and demand; acknowledging and incorporating the rights and authorities of all Basin sovereigns; considering increased hydrologic variability exacerbated by climate change; and addressing the imbalance between available supply and demand.

Another major theme in the comments on purpose and need was the importance of finding the right balance between providing the greatest possible degree of operational certainty for water users and managers while providing sufficient flexibility to respond to changing conditions. Several commenters also encouraged Reclamation to shift from assuring stability to managing instability and prioritizing long-term sustainability.

4.2.10 Scope

4.2.10.1 Geographic Scope

Many commenters encouraged broadening the geographic scope beyond the two major reservoirs to include the Salton Sea/Imperial Valley and/or all or part of the Upper Basin. Some comments also

specifically encouraged including Flaming Gorge Reservoir, Blue Mesa Dam, Navajo Dam, Colorado River Delta, Cienega de Santa Clara, Grand Canyon, Lower Colorado, tributaries, the entire Basin, and/or all ecosystems and landscapes irrigated with Colorado River water. One commenter specifically stated, "If DROA or DROA like flows are to be continued beyond 2026, then [commenter] would urge Reclamation to expand the geographic scope to include the affected segments of river in the Upper Basin above Lake Powell."

Many commenters preferred the scope to remain similar to the 2007 guidelines, focusing only on the Lower Basin and Lakes Powell and Mead. At least one comment raised a concern that "addressing upstream reservoir operations and/or management of the entire Colorado River Basin will unnecessarily complicate and delay development of an operational plan for Lakes Powell and Mead and may exceed the Secretary's authority in the Upper Basin."

4.2.10.2 Temporal Scope

Several comments emphasized the need for the duration of the guidelines to cover a long-enough time scale to reduce regulatory uncertainty, and a short-enough time scale to allow for adjustments and revisions as conditions and available information continue to change. Some comments encouraged a duration for the guidelines of two decades or more, similar to the 2007 guidelines, to reduce uncertainties for water rights holders and remove barrier to conservation investment. Others suggested the duration of the guidelines be no more than 10 years to allow Reclamation to respond to changing conditions.

4.2.10.3 Incorporating Adaptability

Many commenters emphasized the importance of the new guidelines remaining "interim" and/or building mechanisms for adaptability within the duration of the guidelines to allow for future updates. Several commenters suggested incorporating a regular process for assessing the guidelines' adequacy either on a regular schedule (e.g., every 5 years, every 10 years) or at certain pre-established threshold conditions.

4.2.10.4 Scope of Analysis

Comments addressing the scope of the analysis in the EIS also included the following specific suggestions for scope expansion or scope exclusions:

- Redefine "the system" to include more than just infrastructure, including built and natural environments, tributaries, and lands/cities that rely on Colorado River water.
- Consider the Council on Environmental Quality (CEQ) proposal to expand effects to "include ecological, social, and economic considerations, including disproportionate and adverse effects on communities with environmental justice concerns, whether direct, indirect, or cumulative, as well as climate change-related effects, including the contribution of a proposed action to climate change, and the reasonably foreseeable effects of climate change on the proposed action."
- "Evaluate the effectiveness of existing programs and preserve those robust measures or mechanisms that are available to provide greater stability to water and energy systems."

- Analyze "reasonably foreseeable direct, indirect, and cumulative significant effects, including short-term and long-term effects, of implementing the new Operational Guidelines across local, regional, national, and global contexts."
- "Consider any interrelated and/or interdependent actions in the post-2026 operations analyses, to help determine the appropriate action area for analyzing effects. For example, if operating guidelines tie into water released at other dams and lakes to address shortages at Lake Powell or Lake Mead, [commenter] recommends including those areas and analyzing the full scope of environmental effects."
- Perform a comprehensive analysis to "promote the long-term sustainability of the Basin's communities and natural environment in the United States and Mexico."
- "Dam operations under DROA can have the effect of dampening interannual variation between wet and dry years, with increased storage in wet years and larger releases in dry years both resulting in dam releases that mimic a moderate hydrologic classification. The effects of reduced interannual variability under multiple years of such flows should be carefully analyzed with the intent of avoiding undesirable impacts to riparian vegetation and channel geomorphology."
- "The 16,000 acre-feet of conserved Colorado River water provided to the San Luis Rey Settlement Parties pursuant to an Act of Congress and signed Settlement Agreement with the United States cannot be reduced or altered through the current administrative process. This important Settlement benefit is outside the scope of any post-2026 operational guidelines and strategies for Lake Mead and Lake Powell."

4.2.11 Water with Mexico

4.2.11.1 Collaboration with Mexico

Multiple commenters discussed how critical collaboration with Mexico is and that collaboration should occur through a separate process involving the International Boundary and Water Commission (IBWC). Commenters are in support of this process occurring separately but also concurrently with the Post-2026 NEPA process. Commenters emphasized that the Post-2026 process should respect and prioritize Mexico's role as a critical partner in Colorado River management, and that Reclamation should build upon successful binational management efforts. Commenters also stated that Reclamation must allow the IBWC to lead Colorado River negotiations with Mexico, and Reclamation should prioritize coordination with, and provide capacity support for, the IBWC to ensure the United States can prioritize future collaborative management with Mexico. Specific suggestions in this comment included the following:

- Provide bilingual specialists dedicated to working with IBWC in the binational process to define management options for evaluation and metrics for impact assessment.
- In partnership with Mexico, evaluate the potential for a revised salinity agreement to result in conserved water for Lake Mead, and the potential for revised groundwater agreements to increase supply reliability for water users in both countries.
- Ask Mexico for an inventory of projects that could conserve water (if needed, provide resources to develop this inventory).

- Ask Mexico for an inventory of needs related to Colorado River Delta habitat restoration, including the dollars and water needed to extend and expand the benefits created under Minutes 319 and 323.

One commenter also encouraged active and direct participation of the Basin States in formal meetings with Mexico. One commenter acknowledged that while negotiations with Mexico may not be within the Reclamation's control, they encouraged the use of the same processes that have previously led to the successful development of Minutes with Mexico. Another commenter mentioned that while water delivery obligations to Mexico are outside of the purview of the EIS, if water deliveries are curtailed to the Lower Basin States, deliveries would be curtailed to Mexico as well.

4.2.11.2 Article III of the Colorado River Compact of 1922

One commenter stated that "The 1922 Compact requires that the Upper Basin bear half the burden of supplying water to Mexico, which represents an additional 0.75 million acre-foot annual commitment under normal operations. Among the laws comprising the "Law of the River" including the Boulder Canyon Project Act of 1928, the Colorado River Storage Project Act of 1956, and the Colorado River Basin Project Act of 1968, the 1922 Compact is superordinate."

4.2.11.3 Mexican Water Treaty of 1944

Commenters stated that Mexico deserves to receive its full treaty allocation and that the 1944 Mexican Water Treaty allows "Mexico to participate in proportional consumptive use reductions in times of extraordinary drought, and Reclamation should address this obligation in its NEPA analysis to provide for any actions that might be necessary under future Minutes as well as the Upper and Lower basins' obligation to provide for their respective halves of the Treaty delivery requirement." One commenter also stated that Post-2026 operational strategies and Minutes to the 1944 Water Treaty are interrelated, and that maintaining water and life within the system will depend on how binational relationships and opportunities will be considered and cultivated throughout the NEPA processes. Commenters also suggested that the EIS discuss the ability of the United States to reach its treaty obligations to Mexico.

4.2.11.4 Minute 242 of the U.S.-Mexico International Boundary and Water Commission of 1973

Comments stated that Reclamation must deliver water to Mexico at the Northerly International Boundary that does not exceed 115 +/-30 ppm the salinity of water as measured at the Imperial Dam, stated in the terms of Minute 242, and that the EIS discuss the ability of Reclamation to comply with the requirements of Minute 242.

4.2.11.5 Minute 323 of the U.S.-Mexico International Boundary and Water Commission of 2017

One commenter noted, as stated in the NOI, that Minute 323 is set to expire at the end of 2025 and that the United States, Basin States, and Mexico must work through the appropriate binational process which, while separate from development of the Post-2026 operations, should happen simultaneously to develop successor agreements to Minute 323.

4.2.11.6 Colorado River Delta and the Sea of Cortez

Commenters recommended that 10% of the Colorado River's water flow into and through the Delta and Sea of Cortez in Mexico, which would help with carbon sequestration through delta wetlands and mangroves. Another commenter mentioned that flows into the delta have been successful and therefore should be considered in the IBWC Post-Minute 323 discussions. One commenter requested the development of workable solutions that include accounting for improving flows in the Cienega de Santa Clara and for restoring the delta system's hydrologic connectivity and community values over the long term.

4.2.11.7 Scope of Analysis

One commenter asked that Reclamation ensure that the NEPA process includes sufficiently broad analysis to anticipate binational management initiatives and to avoid limiting the scope of what may be possible in a future Minute.

4.3 Alternatives

4.3.1 Alternatives – Boating

Comments related to boating alternatives focused on maintaining water levels at Lake Powell and Lake Mead to serve recreational boating needs, and generally asked that Reclamation consider recreation interests in the EIS. Many commentors wrote in support of BlueRibbon Coalition's "Path to 3588' Plan", which proposes to maintain Lake Powell at an elevation of 3,588 feet. One commentor proposed maintaining Lake Powell at 3,600 feet, and three commentors proposed filling Lake Powell to full pool. Several commentors proposed maintaining Lake Powell at an elevation that would allow the Castle Rock Cut to be navigable but did not specify a target pool elevation. Two commentors asked Reclamation to reconsider how release rates are determined during alternatives development, and one commentor was concerned with how Lake Powell release rates would affect the trout fishery in the reach below Glen Canyon Dam. Another commenter was concerned with how Lake Powell release rates would impact safe whitewater boating below Glen Canyon Dam and encouraged Reclamation to evaluate minimum flows that would preserve save whitewater boating flows of 8,000 cubic feet per second (cfs) from April 1 through September 22. (See the related comment summaries below under Recreation – Boating, Recreation – General, and Recreation – Sport Fishing).

4.3.2 Alternatives – Ecosystem

4.3.2.1 Ecosystem Health of the Colorado River

Many comments requested that Reclamation prioritize the ecosystem health of the Colorado river in alternatives, including ecosystem components such as wildlife, vegetation, wildlife habitats, tributary ecosystems, and wetlands. Wildlife habitats specifically mentioned included the Grand Canyon, the Lower Colorado River, the Salton Sea, and the Colorado River Delta. Along with prioritizing ecosystem health, several commentors emphasized that consumptive water use needs to be decreased from agriculture, lawns, and golf courses to protect habitats. (See the related comment

summaries below under Analysis – Water Conservation and Drought and Analysis – Sustainable, Reliable, and Adaptive Management).

4.3.2.2 Endangered Species

One commentor suggested Reclamation analyze and implement releases of cold water with high dissolved oxygen from Glenn Canyon Dam to protect the threatened humpback chub population from non-native fishes from Lake Powell. The same commentor noted that low water levels at Lake Mead creating the Pearce Ferry rapid may be an effective management strategy to protect native and listed fish species from non-native species present in Lake Mead.

4.3.2.3 Protect Grand Canyon Alternative

One commentor suggested Reclamation develop a Protect Grand Canyon Alternative that would, "ensure High Flow Experiments, safe and navigable flows, a healthy ecosystem including protecting the sediment resource and our native fish and preserving precious cultural resources in this sacred landscape." (See related comment summary below under Alternatives – One Dam).

4.3.2.4 Worst Case Scenario Alternative

Commentors also recommended that Reclamation includes a Worst-Case Scenario Alternative that analyzes the worst-case scenarios on flow rates, and how that would impact the Colorado River ecosystem.

4.3.3 Alternatives – General

General comments on alternatives included the following topics:

- Alternatives should address the supply and demand imbalance.
- Alternatives should achieve a sustainable balance amongst competing uses and provide a resilient water supply (see related comment summary below for Resource Analysis Issues – Sustainable, Reliable, and Adaptive Management).
- Varying suggestions were provided on the prioritization of water uses for public health and safety, drinking water, wildlife uses, and ecosystem services.
- Encourage collaboration among Colorado River system users and share burdens across the Basin (see related comment summary below for Alternatives – Process).
- Broaden "the scope of the proposed action to include the full spectrum of potential local, state, and federal actions that could decrease Colorado River use (assuming that federal funds could help support local and state actions)."

Several alternatives and alternative components that did not fall within the other summarized alternatives categories included the following:

- Use alternative power sources to replace or offset production losses for Glen Canyon Dam and Hoover Dam.
- Stop all development of new dams, diversions, or pipelines across the Basin.

- Develop a regional water plan to track water usage across the Basin and incorporate "accounting procedures that will assist in balancing consumptive uses and depletions with the available water supply."
- Coordinate operations with Flaming Gorge Dam.
- Construct alternatives to allow for high flow events.
- Address structural deficits due to evaporation and system losses.
- Address structural deficits at Glen Canyon Dam.
- Address funding mechanisms for alternatives.

4.3.4 Alternatives – No Action Alternative

Comments related to the No Action Alternative primarily questioned what would constitute the No Action Alternative. Several commentors asked Reclamation to confirm that the default operating criteria when the 2007 Interim Guidelines and 2019 Drought Contingency Plans expire at the end of 2025 would be the 2000 Final EIS for the Interim Surplus Guidelines. Several commentors emphasized that the No Action Alternative cannot extend the 2007 Interim Guidelines or 2019 Drought Contingency Plans, as extending those would require federal action.

Most commentors asked that Reclamation consult with the Basin States and other Colorado River partners and stakeholders in the development of a No Action Alternative. One comment also asked that the No Action Alternative clearly outline the current operational, regulatory, and legal frameworks that govern water storage and deliveries.

4.3.5 Alternatives – One Dam

Comments related to one dam alternatives focused on alternatives that prioritize the preservation of one dam and reservoir (Hoover Dam/Lake Mead or Glen Canyon Dam/Lake Powell) over the other. The majority of comments supported an alternative that prioritizes filling Lake Mead, by either bypassing or decommissioning Glen Canyon Dam. Several comments referenced maintaining Lake Powell at 3,550 feet and sending all excess water to Lake Mead. Many commentors referenced the resources in Glen Canyon emerging from Lake Powell due to low water levels and asked Reclamation to include effects to these resources in the EIS analysis. Three commentors wrote in support of the Grand Canyon Restoration Alternative as proposed by Save the Colorado. This alternative proposes a bypass tunnel around Glen Canyon Dam, allowing the Colorado River to flow freely. Four commentors wrote in support of preserving Lake Powell for recreation. (See the related comment summaries above under Alternatives – Boating).

4.3.6 Alternatives – Operations

Alternative suggestions and alternative components related to dam operations included the following:

- Coordinate operations of Lake Power and Lake Mead reservoirs as "one reservoir."
- Coordinate operations of reservoir storage Basin wide to optimize total combined system storage.

- Synchronize operational periods (e.g., water year).
- Move away from a tiered management approach.
- Expand the tiered management approach and balancing tiers.
- Use open ended, variable, or flexible ranges for target elevations and water releases.
- Manage reservoir elevations to avoid dead pool and allow for continued hydropower generation.
- Utilize mid-year reviews and mid-year changes in operating plans; however, impacts to water users from mid-year shortage allocations should also be considered.
- Operate annual and daily flow releases such that ecosystem benefits below Glen Canyon Dam are prioritized, including coordinating operations within the LTEMP framework.

4.3.7 Alternatives – Shortages

Comments related to shortage alternatives acknowledge a supply and demand imbalance and request that Reclamation "manage the system such that the vulnerabilities and imbalance are reduced." Many comments related to shortage management alternatives focused on the "reapportionment of predicted shortages between basins, states or users." Commenters suggested that allocations be based on flows that "match the annual hydrology of the river" rather than fixed amounts or reservoir elevations, including using yearly flows, yearly variable flow ranges, or 5-, 10- or 20-year averages. The commenter also suggested mid-year reviews in addition to annual flows. Commenters noted that "if the Upper Basin can allocate to each state based upon a percentage of flows that are actually available that year then there is no reason the Lower Basin cannot follow suit." Related to shortage predictions, one commenter requested an analysis of "one or more alternatives that prioritize smaller, more frequent water use reductions as opposed to larger, less frequent reductions to address supply and demand imbalance."

Regarding distributing shortage allocations, commenters requested that allocations be based on proportional water needs, or an equitable distribution based on current allocations. One commentor noted that "communities and water users have different capacities for shortage management and need certainty regarding a firm base supply as well as adequate lead time for putting measures in place to cope with shortages." Comments also requested that shortages be allocated based on the Law of the River, that Tribal water allocations should not be reduced, and that sufficient water supplies to urban and agricultural waters users are maintained. (See related comment summary on Resource Analysis Issues - Water Rights and Agreements). Two commentors also proposed using a water market to manage shortages, including allowing for interstate water marketing and return flow credits below Hoover Dam. One commenter suggested that future water allocations also be apportioned to the reservoirs to replenish reservoir levels in anticipation of future shortages.

To achieve a supply and demand balance, commentors also noted that reductions in consumptive uses are required. Commentors requested that Reclamation require long-term reductions in consumptive uses that are proportional to a user's water allocations. One commenter requested that "one action alternative in the Post-2026 EIS should include a scenario under which water withdrawals are conditioned upon the adoption of best practices for water efficiency and wastewater

reuse that are already in use within the Colorado Basin states." (See related comment summary below for Analysis – Water Conservation and Drought).

Commentors also suggested that Reclamation address evaporation and system transport losses to help curtail shortages. Commentors also suggested building on and improving existing voluntary conservation measures like the intentionally created surplus (ICS) or voluntary water banks to proactively address shortage conditions. (See related comment summary below for Alternatives – Storage).

One commenter also noted that a shortage contingency plan needs to be effectively immediately to address emergency conditions and that previous planning "did not succeed because additional measures were required."

4.3.8 Alternatives – Storage

4.3.8.1 Intentionally Created Surplus

Many commentors requested that Reclamation analyze ICS in the alternatives. Some commentors wanted this program expanded to include more water users (such as retail water agencies or sub-wholesale agencies) others want ICS to be reformed to focus on water conservation that benefits the stability of the river system more than the previous credit/surplus systems. Several commentors voiced that any analyzed ICS programs should still retain rights for priority water users. One commentor suggested that Reclamation analyze ICS programs for the Upper Basin States in addition to the Lower Basin States. ICS alternative suggestions are summarized by the following comments:

> "We are also concerned that some of the interim strategies and agreements including the so-called "intentionally created surplus," the DCP, and the other credit/surplus systems are not viable and could exacerbate future shortages. Reclamation's modeling for the EIS should look how any "calls" on that "credit" from all these agreements could affect the system as a whole. If this analysis is done, we believe it will be clear that the current credit/surplus structure is unworkable without additional sideboards and limitations."

> "The Bureau should examine equitable participation in the ICS system. The most natural use of the ICS system would entail participation by various users within a State in proportion to their entitlement within the State. But in practice, certain users claim the benefit of an outsized share of their States' ICS space. Ensuring broad and equitable participation would tend to promote confidence and responsible use of the ICS system."

4.3.8.2 Drought Plans

A few commentors asked Reclamation to analyze drought plans in alternatives. Some commentors thought that the 2019 Drought Contingency Plan and 2022 Drought Response Operations Agreements were effective, while others believed that they need to be reformed to be more equitable across water users. Drought operations alternative considerations are summarized by the following comment:

> "Currently the operating guidelines focus on deliveries of water from Lake Mead, from the tiered operations in shortage guidelines to balancing tiers from upstream. We need to

expand the role of storage beyond just delivering water to consumptive users, to assess how that storage can be used for system resiliency. A resilient system does not just deliver water--a resilient system manages the entire system, across the entire basin, focusing on multiple values, including environmental, recreational, and cultural. A resilient system focuses on system integrity as a top priority, as opposed to mechanical water deliveries.
The implementation of Drought Operations in 2022 provided a great example of a more flexible approach to addressing system resiliency through creative use of reservoir storage and delivery."

4.3.8.3 Rebuilding Water Storage

Many commentors requested Reclamation rebuild the water storage capacity of both Lake Mead and Lake Powell, and commentors asked that Reclamation analyze the empty storage capacity of both reservoirs as resource. Several commentors emphasized that proactive water storage in the reservoirs is needed to protect against drought and increase system resiliency. One commentor asked Reclamation to consider opportunities to store non-federal water in Lake Mead. One commentor suggested coordinating the management of Lake Powell and Lake Mead, treating them as one storage unit rather than two (see related comment summary above under Alternatives – Operations). Two commentors also suggested the use of surface water covers on Lake Mead to reduce evaporation losses. Storage alternative considerations are summarized by the following comment:

> "The present Interim Guidelines were not designed to facilitate carry-over storage of annual apportionment in Lake Mead except through intentional conservation and they impose significant constraints on intentionally created surplus that should be re-examined and changed. Empty storage capacity is a resource that should be maximized to facilitate capturing wet extremes, including through storage of non-system water via exchanges. There is great potential to expand access to federal storage capacity to a broader group of water users in both the Upper and Lower Basins to improve over-all climate resiliency."

4.3.9 Alternatives – Surplus

Commenters noted that although the likelihood of future surplus water conditions was low; there should be management options for surplus conditions when they do occur. Commenters requested that surplus water be stored in the reservoirs for several reasons, including to restore boating opportunities at the reservoirs and to store water for use in future shortage conditions. Some comments requested that criteria be developed for Lower Basin distributions in surplus years and stated that the Law of the River should control the delivery of surplus flows. Surplus alternatives are summarized by the following comment:

> "…the EIS should consider alternatives that include criteria for distributing surplus in the Lower Basin. While the likelihood of experiencing surplus conditions in the future is unlikely, Reclamation should be prepared for such a possibility and develop clear criteria to appropriately manage the additional water supplies, with a preference for using these supplies to create "buffers" to reduce the impacts of periods of sustained low hydrology."

4.3.10 Alternatives – Water Source

Comments related to alternative water sources focused on water source augmentation and exchanges. Multiple comments suggested augmentation of Colorado River water through binational

programs to import river water or desalinized water from Mexico, desalination to supply California water demands, importing water via pipelines from other states and basins, investments in cloud seeding across the Basin, and reuse and recycling projects. Several comments also suggested using alternative waters sources of desalinization and groundwater pumping to replenish diminished water supplies to the Salton Sea basin. In contrast to comments in favor of augmentation, other commentators stated that the EIS process is not the proper forum to analyze specific augmentation projects.

4.3.11 Alternatives Development Process

Comments related to the alternatives development process focused on the scope of alternatives, the methodology used to measure water in the system, and stakeholder and public outreach in the alternatives development process.

4.3.11.1 Scope of Alternatives

Comments regarding the scope of alternatives were split between commentors who would like to see Reclamation explore a wide array of alternatives and commentors who only want to see Reclamation analyze legally viable alternatives:

> "The EPA recommends that Reclamation evaluate, in detail, all reasonable alternatives that fulfill the project's purpose and need. We encourage Reclamation to explore alternatives, or elements of alternatives, beyond the agency's direct control, such as partnerships with states and other entities to decrease water use and align distributions with projected supply."

> "Alternatives in the Post-2026 Operational Guidelines EIS Reclamation must only analyze legally valid alternatives, which requires it to respect Acts of Congress, Court Decisions and Settlement Agreements signed by the Secretary of the Interior that are not subject to modification by Reclamation through its administrative actions."

One commentor suggested that Reclamation create criteria for screening alternatives early in the process to eliminate alternatives that do not meet the purpose and need of the EIS. Another commenter asked that Reclamation identify the proposed action and No Action Alternative in the EIS so stakeholders can clearly understand what is being analyzed.

4.3.11.2 Measurement Methodology

One commentor asked that Reclamation address inconsistencies in the ways stakeholders across the Basin measure the Colorado River System. "The parameters used to determine operations, including evaporation, consumptive use, and Lower Basin tributary usage must be accurate and transparent, using agreed-upon data sets."

4.3.11.3 Stakeholder/Public Outreach

Three commentors wrote regarding outreach. Two were supportive of Reclamation's intent to create online tools for engaging with the public. One commenter suggested Reclamation use their interactive web-tool of the Taylor and Gunnison Rivers as an example when creating the tool for the EIS process. The commenter also asked that USGS and NPS be consulted regarding recreation and

river data. One commentor asked that the values of agricultural production be included in the online tools.

4.4 Resource Analysis Issues

4.4.1 Air Quality

Comments included concerns of dust diminishing air quality, specifically in relation to fallowed agricultural lands, playa salt flats and newly exposed lakebed sediments that would be subject to wind erosion. Residents of Imperial and Eastern Riverside counties expressed concerns of the introduction of particulate matter of 10 microns or less (PM10) dust in the Salton Sea region. Commenters also expressed concerns of exacerbating air quality problems around the Salton Sea.

Comments mentioned first establishing existing environmental conditions in the affected airsheds using the attainment of National Ambient Air Quality Standards as a baseline dataset, then evaluating and disclosing any air quality impacts associated with Post-2026 alternatives and, if necessary, detailing mitigation steps that would be taken to minimize adverse impacts.

4.4.2 Baaj Nwaavjo National Monument

Commenters applauded the President's designation of Baaj Nwaavjo National Monument and encouraged future efforts to preserve additional land along the Colorado River.

4.4.3 Climate Change and Greenhouse Gas

Comments regarding climate change and greenhouse gas recommend adjusting water modeling to prepare for multiple scenarios, including extreme low water flows and making modeling applicable to current and anticipated future climate conditions as well as revising water allocations to reflect lower flows in the Colorado River. Commenters recommend using the best available science and suggested literature to accurately predict the impacts of climate change on the future hydrology of the Colorado River. Multiple commenters suggested that Reclamation create a strategy to increase management flexibility, enhance climate adaptation planning and improve infrastructure resilience.

One commenter would like the EIS to clearly identify how the alternative polices and operations identified account for evaporative losses and would like Reclamation to consider other climate-related input data such as increases in the fraction of precipitation falling as rain rather than snow, increased frequency of extreme weather events resulting in heavy precipitation and flooding, dust accumulation on snow, and changing soil moisture levels. The commenter suggests these assumptions to be used in hydrologic and environmental modeling such as the Colorado River Mid-term Modeling System and use the modeling to assess potential impacts from changes in the amount and timing of streamflow to identify how changes would potentially affect aquatic species, riparian and wetland habitats, and water temperature.

One commenter expressed concerns for increased greenhouse gas emissions from dam and reservoir operations causing climate change. Commenters also recommended that the hydropower operations on the Colorado River be categorized as renewable, carbon-free energy, which are more sustainable and important power sources in this age of climate change.

Commenters suggested the EIS apply the interim guidance published by the CEQ that was developed in response to Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis as well as the EPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks data to ensure robust consideration of potential climate impacts, mitigation, and adaption issues. As well as discuss relative changes in reservoir levels under each alternative in the context of reducing greenhouse gas emissions and achieving power sector targets and discuss regional capacity to replace hydroelectric power with other renewable energy sources like solar or wind. Commenters discussed the want to see calculations of greenhouse gases produced by dam and reservoir operations provided as an appendix to the EIS. One commenter suggested enlisting the National Academy of Sciences to run focus groups regarding climate adaptation strategies and environmental effects of operations and the Center for Climate Adaptation Science and Solutions at the University of Arizona to partner on the development of strategies for sustainable solutions.

4.4.4 Cultural and Tribal Resources

4.4.4.1 Complete and Efficient Water Use

Comments highlighted that "there is a critical need for infrastructure to allow Tribes to fully and efficiently use their water resources," and that while many Tribes have entitlements to water resources from the Colorado River, many are unable to fully access and use said water. One commenter indicated that without adequate infrastructure, Tribes cannot adequately provide clean drinking water, adequate sanitation, clean energy, and economic opportunities to their members. One commenting Tribe suggested that in parallel with the Post-2026 guidance process, Reclamation or other federal agencies establish "infrastructure funding sources aimed at ensuring equitable access to water for Tribes" to support "construction of pipelines, canals, and reservoirs, as well as implementing modernization measures, and advanced water management technologies" and invest "in modem, efficient water infrastructure" to enhance water supply reliability and support economic development, safeguard ecosystems, and strengthen the resilience of tribal communities.

4.4.4.2 Glen Canyon

Comments acknowledged the valuable cultural and natural resources that have emerged due to decreasing water levels in Glen Canyon. Many commenters expressed concern around the preservation and management of cultural artifacts and sites within Glen Canyon but varied on whether to maintain Glen Canyon's low water levels or reallocate water for continued inundation. Some comments indicated the value of maintaining lower water levels in Glen Canyon to minimize impacts from long-term inundation, while also allowing Tribes, researchers, and federal agencies access to, and management of, the newly uncovered resources. Other commenters noted that lower water levels put cultural sites at risk for looting, vandalism, and damage from changing environmental conditions, additionally noting that the EIS must analyze the implications of all alternatives on the integrity of Glen Canyon's undocumented cultural resources.

4.4.4.3 Laws, Regulations, and Court Findings

Comments generally expressed that the EIS analysis should be consistent with applicable federal laws, regulations, agreements, case law, compacts, and decrees that address Tribal water rights. Some commenters even noted that many past actions by the federal government have been in direct

contradiction to the legal water rights of Basin Tribes. One commenter noted that the Post-2026 guidelines are an opportunity to ensure Tribal water rights are upheld throughout the Basin. Examples of those specifically mentioned by commenters for consideration in the EIS included the following:

- Hualapai Tribe Water Rights Settlement Act of 2022, S.4104 – 117th Congress
- Southern Arizona Water Settlement Act, H.R.5118 – 97th Congress (1982)
- Federal Reserved Water Rights Doctrine
- Arizona v. California, 373 U.S. 546 (1963)
- Winters v. United States, 207 U.S. 564 (1908)
- Cappert v. United States, 426 U.S. 128 (1976)
- United States v. New Mexico, 438 U.S. 696 (1978)

4.4.4.4 Tribal Sovereignty

Comments emphasized that Reclamation must respect the sovereignty of the Basin Tribes throughout the decision-making process. One comment recommended including sovereign nations in the alternatives development process to ensure traditional ecological knowledge is being placed at the forefront of the NEPA process as directed by White House Memorandum dated November 15, 2021, Indigenous Traditional Ecological Knowledge and Federal Decision Making. One commenter further suggested that the EIS should analyze impacts to Tribal assets including waters, lands, and native plants used to sustain traditional practices. Another commenter indicated that Reclamation's 2012 NEPA Handbook requires that all impacts to Indian Trust Assets, regardless of significance, be analyzed in the EIS, and appropriate compensation and mitigation be implemented.

The Basin Tribes rely on the Colorado River to sustain their communities physically, economically, culturally, and spiritually, and many commenters expressed concerns that only some of the Basin's Tribes have quantified water rights, yet all Tribes should be able to receive equal protection of their water rights. One comment requested that any Reclamation proposed action should consider the significant senior water rights of the Basin's Tribes, regardless of whether they are quantified or unquantified. Another commenter noted that there should be no unlawful or uncompensated reallocation of Tribal water resources.

4.4.4.5 Tribal Water Rights

Scoping comments largely focused on Reclamation's responsibility to ensure the water rights of the Basin Tribes are protected as a part of the Post-2026 guidelines. Many comments suggested that Reclamation consider subtracting Tribal water allocations prior to determining future allocations or diversions as a mechanism to protect Tribal water rights.

Multiple commenters noted that Tribes could be willing to leave water in the Basin to improve river and reservoir operations with proper economic compensation. One comment suggested that Tribes could "receive compensation for any economic loss that could have been experienced from utilizing the water, costs of restarting the water systems once the water is again being consumed, and lost

opportunities that could have occurred during the period of abatement," providing an incentive to leave water entitlements unused.

4.4.5 Energy

Comments coded to energy generally related to the hydropower operations along the Colorado River. Many of the comments expressed concerns about low water levels in Lake Powell leading to a loss of energy production from Glen Canyon Dam.

4.4.5.1 Alternative Sources of Power

Comments suggested that the Post-2026 efforts should consider alternate or replacement power production methods to mitigate the impacts of reduced power production or the loss of power.

Some comments of this nature recommended that new power production projects should be on Tribal lands with Tribal administration.

4.4.5.2 Analysis

Multiple comments were related to the analysis that should be done in the EIS regarding energy. Some comments requested that EIS analysis thoroughly investigate how the Post-2026 operations may impact hydroelectric power generation; an example of these types of comments states, "analytical support will be needed to evaluate the impacts of reservoir operations on hydropower generation and system-wide water resource operation." Other comments included more specific requests for analysis, such as "incorporate [Long Term Experimental Management Program] findings in any future plan and reconsider the tradeoff of peaking flows at the cost of the river's aquatic ecology and recreational use." Another commenter requested, regarding analysis in the EIS, that the Post-2026 operations account for the water needed to maintain power production, in all ongoing and planned projects.

4.4.5.3 Glen Canyon Dam Engineering

Commenters mentioned that the Glen Canyon Dam has engineering limitations and recommended that the Post-2026 efforts consider incorporating modifications to the engineering of the dam to allow for continued hydroelectric power production during low reservoir levels.

4.4.5.4 Power Grid

Comments included recommendations to thoroughly analyze potential impacts of the Post-2026 operations on the "the reliability of the western electric grid" and that operations ensure a reliable power grid base load. Comments suggested the EIS process should include analysis of the impacts on the cost of power to users and contractors. One comment stated that the Post-2026 process should "identify legislative and regulatory strategies to rebalance power obligations in a time when the hydropower contract deliveries are not reflective of the costs charged to power customers." In a similar vein, comments suggested that the EIS process should analyze how reduced releases from the dams during the dry summer months will affect the grid, when electrical demand is usually highest. One comment suggested that Reclamation should consider assembling a team composed of a broad range of industry experts to evaluate the potential impacts to the western energy grid.

4.4.5.5 Regulatory

Comments mentioned other regulatory or statutory protections that relate to or include provisions regarding energy production along the Colorado River. Specific citations included the 2019 Drought Contingency Plan, the 1956 Colorado River Storage Project Act (CRSP) (Pub. L. 203-485), and the 2007 Interim Guidelines. One comment indicated, "it is important at the outset of this process to recognize the statutory authorities [of CRSP] and mandates underpinning Dam operations." Another comment stated, "four original elements of the 2007 Guidelines 'have remained intact', despite additional agreements and actions being undertaken. One such agreement… is the [DCP]." Comments suggested that Reclamation coordinates its efforts regarding power production between the 2007 Interim Guidelines and the Post-2026 operations.

4.4.6 Environmental Justice

Comments included concerns about the environmental justice implications of reduced water supplies on rural, Tribal, agricultural, and other underserved communities, such as secure access to water, economic shortcomings, and availability of sustainable and affordable energy sources. Some commenters were also concerned about the inability of many underserved communities to adequately participate in the decision-making process, despite being those most directly affected. Many commenters noted that Reclamation should ensure that the EIS process avoids, minimizes, or mitigates adverse and disproportionate impacts to environmental justice communities. One commenter suggested that Reclamation incorporate an environmental justice perspective into all facets of decision-making process and strive to achieve water equity among all users through operations and funding consistent with Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All (*Federal Register* 88:25251).

4.4.7 Human Health and Safety

Commenters expressed concerns of water deliveries being able to meet public health, safety and welfare needs if hydrologic conditions change. One comment mentioned that beneficial use considerations should maximize the scarce water supplies for all and provide flexibility to the water users to determine appropriate improvement. Commenters requested the EIS include provisions in the operational guidelines that protect sufficient storage in Lake Mead and provide for clean water deliveries to all users including Tribal members, and a section that discusses any operational changes that would reduce deliveries to the Salton Sea region, including a robust analysis of impacts to public health and safety of residents and identify other areas that would have similar impacts in the project area. Comments also suggested Reclamation provide funding or technical assistance for access to clean drinking water for Tribal members that do not have plumbing to access clean drinking water. Multiple commentors expressed concerns for individuals that rely on water availability, specifically mentioning residents of Page, Arizona and Navajo Native Americans that reside on the adjacent reservation. One commenter requested Reclamation to define public health and safety in the EIS.

4.4.8 Recreation – Boating

Comments related to recreational boating focused on family-centric recreational experiences, the economic value of recreational boating, water levels impacting recreational boating infrastructure and experiences, and alignment of current planning efforts with existing conditions.

4.4.8.1 Alignment of Planning Efforts with Existing Conditions

One commenter noticed that planning efforts at the Lake Mead National Recreation Area are focused on actions to be taken when reservoir levels improve. This commenter requested that Reclamation and NPS "identify operational guidelines and strategies that retain recreational boating access in Arizona" at Lake Mead and Lake Powell "given that the system has been experiencing a prolonged period of drought and low-runoff and future reservoir elevations are uncertain."

4.4.8.2 Economic and Family Value of Recreational Boating

Commenters brought attention to the economic value of recreational boating, stating "It has been estimated that more than 60 percent of all visitors to the Lake Mead National Recreation Area use some type of motorized watercraft." Additionally, there were many positive sentiments about recreationists and their families enjoying Lake Powell and Lake Mead for decades (e.g., 30 years, 35 years, 40 years, 45 years). These commenters also supported maintaining higher water levels and decreasing releases.

4.4.8.3 Impacts of Water Levels on the Recreational Boating Experience, Infrastructure, and Operations

Comments related to water levels on the recreational boating experience asked what the lowest feasible flows are that can be safely navigated by large motorboats that enable underserved members of the public to experience the Grand Canyon. Commenters noted that water levels need to be high for enhanced recreational experiences for visitors, as "reduced lake surface areas have resulted in wakeless areas, safety concerns, and increased boater travel times and gas expenditures. Launching large boats and traveling through narrower channels [has] become more time-consuming and complicated. Smaller watercraft traffic has increased in some areas, and this presents challenges for safe navigation in tight channels when combined with larger boats." It was also noted that since Lake Powell's decline in 1999, other recreation resources such as Cataract Canyon have emerged, and that the return of the river in this area, and its whitewater rapids, "have created a recreational experience that hasn't been available since the reservoir first drowned the canyon. 3,000 to 4,000 visitors to the park unit raft down this section of river every year."

Commenters also expressed concerns of the impacts of water levels on recreation infrastructure such as rapid changes in water level elevations causing additional strain on new infrastructure. Comments were also concerned about impacts on operations such as marina operations (particularly to Antelope Point Marina) and decreased boat ramps on Lake Powell and Lake Mead and stated that "To adapt to the declining reservoir, NPS will need to extend boat ramps and move marinas." Currently, the NPS plans to close the Bullfrog Marina in Lake Powell and "move the infrastructure into the main channel…"

Commenters also expressed concerns that reduced water flows may require a reduction in recreational users on the river to maintain an enjoyable recreation experience. One commenter stated, "Recreational use of the river corridor it set forth in the Colorado River Management Plan. Use of the river is quantified by the daily number of trips launching (TAOT) and daily number of people launching (PAOT). TAOT was determined by the number of campsites, which have been severely degraded over time by daily fluctuation of flows and eroding beaches… continued daily flow fluctuations will negatively affect recreational use and enjoyment of the river corridor and may

require a reduction in TAOT in the future." One commenter also expressed that the NEPA analysis should include planning for a permanent solution for the Hite boat ramp and broader recreation area if Lake Powell is to be managed at low levels.

4.4.9 Recreation – General

Comments related to general recreation focused on comments related to impacts on general recreational activities and opportunities related to low water levels, high flow experiments (HFEs). One commenter expressed concerns over deadpool levels and toxic algal blooms and impacts those would have on recreation, noting that deadpool levels could become a common occurrence, impacting both water quality and recreation (see related comment summary above related to algal blooms under Rescue Analysis Issues – Human Health and Safety).

Comments related to low water levels highlighted that during the spring of 2023, over 100,000 acres of land once inundated by Lake Powell emerged, creating "significant recreation opportunities" in the Glen Canyon National Recreation Area, uncovering "Unique geologic and natural features like Cathedral in the Desert, Gregory Bridge, LaGorce Arch, and countless waterfalls, grottos, alcoves, and other natural wonders once again became highlight features of the park unit…" thereby, "[e]nriching the overall experience and even attracting more tourists to the area." One commenter stated that "The American public serves to get an accurate assessment of the recreational resource values that Glen Canyon can and does supply," noting that referring to returned river corridors such as Cataract Canyon solely as "Lake Powell" and not "Glen Canyon" demonstrates that reservoir recreation is favored over river ecosystems.

Comments related to HFEs expressed the importance of HFEs to manage sedimentation in the Grand Canyon by replenishing sandbars and camping beaches and creating high-quality recreational access along the river. Commenters also noted that "less frequent HFEs may also negatively impact campable areas… impacting river recreation in the Grand Canyon." One commenter asked, "[H]ow can HFEs (in particular, naturally timed HFEs under sediment enriched conditions) be ensured and optimized throughout this EIS considering our low water future?" Last, one commenter expressed concerns that water levels are low because of HFEs, not drought. Comments that encompassed general recreational concerns asked Reclamation to consider the impacts on recreation during the NEPA process and generally support preserving and protecting water levels to facilitate recreation. One commenter requested that Reclamation analyze what new recreational opportunities would arise if operations were to change.

4.4.10 Recreation – Sport Fishing

One commenter was concerned about the impacts to the Blue Ribbon rainbow trout fishery at Lee's Ferry, as this fishery supported 251 jobs and contributed $16.8 million to the Arizona economy in 2013. Another comment noted that the Arizona Angler's Expenditures and Economic Impact of Fishing the State report estimated that fishing-related expenditures bring in about $79.3 and $70.6 million to Mohave and Coconino Counties, respectively.

4.4.11 Resource Analysis

Comments coded to this topic were determined to not fit appropriately within a particular code and are therefore captured in this section. Comments were received that addressed the types of analyses

that should be included in the EIS. Commenters provided suggestions about Reclamation's NEPA process noting it should "identify, assess, and address the possible impacts not only to the operation of Colorado River reservoirs but also to the critical social, cultural, and environmental resources that define the river and its tributaries." Another comment indicated that "at a minimum, Reclamation should include consideration of benefits and effects as compared to baseline conditions for proposed operations and strategies on Colorado River water availability" with an emphasis on ecological integrity and functionality. Commenters also provided suggestions for a myriad of resources that should be analyzed in the EIS. Listed resources included water quality, water storage and supply, air quality, visual resources, geology, soils, water resources, wildlife, special status species, biodiversity, land use, Tribal assets and rights, socioeconomics, cultural resources, climate change, and environmental justice.

Commenter also suggested the inclusion of "an analysis of current priority uses of Colorado River water in the EIS" as it "is necessary to provide a clear direction in the future." Additionally, a commenter cited the current prioritization of use at Hoover Dam (per the 1928 Boulder Canyon Project Act) that prioritizes water regulation over power production. The comment stated, "renewable energy production in the United States is very important, water regulation, through this legislation, supersedes power generation and as long as water can flow through the dams, this fundamental resource should not be inhibited in the 2026 Operational Guidelines even for the sake of power generation."

Lastly, one comment stated, "…to the extent any changes would limit the amount of water historically available to the [Colorado-Big Thompson] C-BT, such changes should be evaluated in light of their impacts on Colorado's South Platte River Compact obligations and Nebraska's corresponding rights."

4.4.12 Sedimentation and Geology

Commenters included concerns about the lack of sediment mobilization, requesting that the EIS include a Sediment Management Plan for Glen Canyon and address issues such as waterway access, resource impacts and resource remediation. The USGS sediment survey of Lake Powell was mentioned to reference for portions of the Sediment Management Plan. Multiple comments expressed general concerns about lack of sediment mobilization causing degradation of habitats, cultural sites, and recreational beaches; commenters asked that this be further analyzed in the EIS, and that sediment balance be added into management considerations. Multiple comments also mentioned sediment deltas accumulating in Glen Canyon. One commenter mentioned concerns of sedimentation eventually at Glen Canyon Dam and provided a study that found if the reservoir were to remain at levels between power pool and deadpool, sedimentation will eventually reach the dam and directly affect flow into the river outlet works. One commenter requested a cost and benefits analysis of different soil conservation strategies.

4.4.13 Socioeconomics

Comments included concerns around the economic impacts from diminished boating, rafting, and other tourism opportunities along the Colorado River and within its reservoirs. Commenters indicate that local, regional, and Tribal economies could be severely affected by reduced water allocations, resulting in widespread job loss and economic shortfalls. Additional comments included concerns around the impacts to agriculture operations on Tribal lands and in Lower Basin States,

such as California and Arizona, in the event of reduced water supply. Commenters also noted that U.S. food security could be at risk should water allocations be reduced. Some commenters discussed the need to reduce water-intensive agricultural practices, such as alfalfa production, in the region in favor of water allocations to communities, recreation, and energy production, and sustainable farming practices. Finally, one commenter mentioned that hydropower project revenue may be able to support federal priorities and Post-2026 operations.

4.4.14 Sustainable, Reliable, and Adaptive Management

Comments related to sustainable, reliable, and adaptive management included requests to protect or restore the Colorado River. Many commenters pointed out the importance of the river and its associated resources to human and ecological life. Comments included sentiments such as, "Protecting [the Colorado River] for future generations is essential" and "We must protect this environment, to manage it responsibly, to make sure that all future uses of this land are focused on sustainability while protecting the lands for wildlife habitats, recreational use, and indigenous people's rights." Commenters also communicated an interest in Post-2026 management strategies to be clearly defined and implemented in a fair and transparent manner.

4.4.14.1 Broad Range Approach

Commenters noted that Post-2026 management should be based on a broad range of future conditions, including worst-case scenarios and a full range of plausible hydrologic extremes brought on by climate change. Commenters also requested that strategies avoid crises management, with one commenter sharing that "Failure in this realm will perpetuate a crisis-based decision environment and continued uncertainty for all water users."

4.4.14.2 Federal Funding

Multiple comments mentioned that Reclamation should consider the use of federal funding to help fulfill and maintain the Post-2026 operations and management strategies. Comments along these lines stated, "Any additional conservation prescribed through the new set of guidelines must include adequate federal funding to ensure long-term supply reliability and that communities and economies are sustained" and "Robust federal support for demand reduction strategies should include adequate funding for reduction measures as well as federal research and organization of peer-to-peer information sharing."

4.4.14.3 Flexible and Adaptive Management Approach

Many comments expressed a desire for the Post-2026 operations to implement adaptive and flexible management strategies. Comments requested that management approaches include "a greater diversity of response options" and "flexibility [to] allow for adaptation to changing conditions." Commenters mentioned that adaptive management should be built on the flexibility that has been exercised over the past decades, updated science and accurate modeling, trending hydrology and demands, and actual resource conditions.

4.4.14.4 Holistic and Balanced Management Approach

Comments expressed that the EIS efforts and the Post-2026 management strategies should take a comprehensive and holistic approach. Commenters requested that Reclamation "be creative in considering how to use and account for storage over the Colorado River system" and balance preservation of natural systems, and human, biological, and engineering needs when drafting management strategies.

4.4.14.5 Long-Term Sustainability and Stability of the River

Comments stated that Reclamation adopt long-term, equitable, sustainable, and stable solutions when developing Post-2026 operations that "actually solve problems on the Colorado River rather than kick the can down the road." Comments also stated that predictability, reliability, and stability of Colorado River water supply should be a goal for the Post-2026 operations. Commenters requested that Reclamation shift management strategies to a more sustainable balance with a long-term view to "provide operational longevity under any hydrologic or system condition."

4.4.15 Vegetation

Comments include concerns about destruction of riparian vegetation in the Glen Canyon and Lake Powell regions due to increased flows and potential inundation. Many comments mentioned the ecological succession and establishment of native riparian communities as a result of low elevation levels in Lake Powell creating areas below full pool elevation where native vegetation can proliferate. One comment mentioned the EIS should include impacts of water storage in Lake Powell on ecological resources in the region that have been established since 1999. Comments would like the EIS to include efforts to survey existing riparian communities in the Glen Canyon and Lake Powell regions. Additionally, multiple comments express concerns of further proliferation of new and existing invasive plant species, such as tamarisk. Comments suggest removal of tamarisks to preserve riverine and riparian habitat which could potentially increase water flows for downstream consumptive use. Commenters would like Reclamation to utilize Inflation Reduction Act funding to provide ecological restoration and address invasive plant species.

Additionally, one commenter requested that the EIS provide how Post-2026 operations would comply with Executive Order 11990, Protection of Wetlands, including how wetlands would be identified and avoided. If wetlands on federal lands are going to be impacted, it is recommended to offset mitigation based on a functional replacement approach rather than acre-to-acre replacement to ensure that the specific wetland functions are replaced in an ecosystem. Conversion from one type of wetland to another will likely result in the loss or degradation of certain wetland functions, but any assumptions regarding wetland quality and function should be field-verified using an assessment method appropriate for the region. The commenter suggested Post-2026 monitoring for potentially adverse effects to wetland functions.

4.4.16 Water Conservation and Drought

In general, many comments related to water conservation and drought expressed that all recipients of water from the Colorado River needed to reduce water consumption, and/or that states and/or cities need to be taking a more active role in conservation measures. Additionally, several comments requested that Lake Powell not be drained to fill Lake Mead, especially during drought years, and

that "draining lake Powell to prop up lake Mead is only a band-aid to the much larger issue of water conservation in desert states."

4.4.16.1 Agriculture

Many commenters believed that the prioritization of water allocated to agriculture needs to be re-evaluated, as agricultural needs consume 75% of Colorado River water, and that crops, such as alfalfa and almonds, should not be grown in desert areas and should be replaced with crops that are more drought-tolerant, such as agave. Commenters also suggested installing low-flow or drip irrigation systems, watering at night, crop rotation, evaporation suppression, and cultivating healthy soil systems to better retain moisture as solutions that should either be encouraged or required by law. One commenter referenced the success of California's 2003 Quantification Settlement Agreement, an urban/rural partnership in on-farm water conservation, that could be used as a model for other states because such partnerships conserve water supplies that can then be used to meet the increased demands from population growth.

Another commenter referenced the steps that the Yuma farmers have taken to improve their water use efficiency, including multi-crop production systems (crop rotation twice a year), improvements to on-farm infrastructure (alternative water delivery systems, conveyance system modifications), and district-wide modifications. The commenter suggested that funds be allocated to improve agricultural systems throughout the Basin. One comment suggested that "They need to be required to take the money they receive to fallow fields and reinvest a large percentage of that money into efficient irrigation methods."

4.4.16.2 Evaluating Effectiveness of Conservation Measures

Several commenters suggested that there should be an emphasis on "evaluation of the effectiveness, efficacy and long-term benefit of various conservation measures put in place associated with the 2007 Interim Guidelines or other related consultations" because "some conservation measures may not be meeting conservation goals and should be re-evaluated to determine if they can be improved or if those measures should be discontinued or replaced with different options."

4.4.16.3 Improved Efficiency of Water Usage

Many comments expressed the sentiment that commercial and household water usage actions are not as efficient or effective as they should be at conserving water and reducing waste. Commenters included suggestions for areas of improvement, including agriculture (as mentioned above), household appliances (installation of low-flow toilets and showers), and landscaping (grass lawn conversions to xeriscaping). A representative comment stated, "Homeowners should have desert yards and no swimming pools. Golf courses can convert to artificial grass and no irrigation to save water."

4.4.16.4 Incentives and Fines

Commenters stated that "reductions work best where they are voluntary—and voluntary reductions happen most often when they are compensated" and that should financial incentives be included, a reliable funding source must be identified. One commenter noted that a market-based system for reallocating water may be advantageous and encourage further voluntary reduction: "Although such transfers can raise policy issues, they may be a promising avenue for reallocating water use in ways

that the participants find advantageous, yet which the Bureau would otherwise have no insight into or authority to impose on its own. The Bureau could play a valuable role in facilitating such markets--for example, by ensuring that market forces set prices that will maximize participation in voluntary arrangements."

Conversely, other commenters felt that fines or a form of punishment such as increased rates should be imposed upon those who don't implement water conservation strategies, particularly factory farms, corporations, and cities. A representative comment stated, "Any farmer or corporation that refuses to switch to more sustainable practices should be charged 5 times the normal rate per gallon."

4.4.16.5 Lawmaking and Fairness

Many commenters who felt that water usage efficiency should be improved expressed sentiments similar to "things such as irrigated grass lawns and golf courses should not be allowed" and felt that either new laws should be passed, or current laws should be changed to outlaw or force reduced water consumption by services or features deemed "non-essential." Additionally, commenters felt that current water laws are outdated and are based on supporting development instead of sustainability, and that laws should be passed so that Lower Basin States have reduced water allocations during periods of drought. A few commenters also focused on agricultural use, requesting that legislature "change the agriculture laws especially in drier states so they can't take the majority of water."

Some comments expressed that it was unfair for Lower Basin States to benefit from the conservation measures implemented by Upper Basin States, and that lawmaking could determine a way to make water allocations fairer. A few commenters felt that it was unfair for some foreign countries such as China and Saudi Arabia to irrigate crops with water from the Colorado River and export food to their homelands, and that lawmaking should encompass this topic.

4.4.16.6 Limiting Development

Commenters felt that development in cities such as Las Vegas, Nevada; Los Angeles, California; Phoenix, Arizona; and other growing urban areas that source water from the Colorado River should halt future development to discourage population growth and decrease additional water consumption. Additionally, corporations that build in these areas and attract new residents were called out as being part of the problem.

4.4.16.7 Reclamation of Used Water

Several commenters suggested that Reclamation "should consider a framework for exchanges for implementing potential augmentation projects." Commenters also suggested that higher volumes of graywater and wastewater should be reclaimed and reused to water golf courses and lawns, used for agriculture, returned to the river, and Reclamation should "develop regulations for indirect (IPR) and direct potable reuse (DPR) of reclaimed wastewater." One commenter noted the success Nevada has had with water reuse programs and requested "grant funding for large reuse projects."

4.4.17 Water Management and Modeling

There were many suggestions and comments related to water management and modeling in the Post-2026 operations analysis, including general comments and assumptions, suggestions and recommendations to refine the models, and discussion of the ensembles used in alternatives development. Many comments requested that Reclamation analyze an adequate and wide range of hydrologic variations, factors, and operating conditions. One comment specified a range, "between 9 million acre-feet and 17 million acre-feet… regardless of the observed historical period of record." One comment requested that the modeling framework used by Reclamation, "avoids or disincentivizes efforts to take advantage of strategies and operations for the benefit of some at the expense of others." Regarding the models for available water, one commenter wrote that Reclamation should consider, "distinguish[ing] between water over which Reclamation has authority… and other water in the Colorado River…." One commenter requested public access to the code that comprises Colorado River Simulation System (CRSS) models and the Colorado River Mid-term Modeling System. One commenter suggested that "[w]hen using calculations to determine releases from both Glen Canyon and Hoover Dams, use continuous functions rather than tiers (step functions) for annual releases so there are not dramatic changes on either side of a reservoir elevation tier." One commenter recommended that Reclamation, "[b]uild models predicated on non-stationarity weather patterns."

Comments related to water management suggested Reclamation implement a July-June water accounting year, as it "better suits Colorado River Basin agriculture production seasonality and crop planning needs." One comment noted that Reclamation needs to consider, "current impacts of the existing water management policy on the Colorado River, including the [QSA and DCP] and potential impacts of changes to water management policy." Comments also suggested increasing the scope of the model, "beyond storage conditions and static trigger levels at Lakes Powell and Mead… beyond those developed for the Basin Study… and consider the benefits and impacts of essential environmental resources." It was also suggested that "improved data related to groundwater use, storage, and recharge rates in the context of alternative scenarios of surface water availability in a changing climate is a critical science need for the Colorado River Basin." One comment recommended that Reclamation, "simulate and present, as simply as possible, projected water budgets that account for water entering the system, water leaving the system (e.g., from consumptive use, trans-basin diversions, evaporation), and water moving through the system (stored in reservoirs or flowing in river reaches)."

4.4.17.1 Additional Models

There were many comments specific to the ensembles used by Reclamation in its modeling of alternatives. Commenters tended to prefer the temperature-adjusted ensemble and felt that the other ensembles could be improved, noting they have a wet bias. Other commenters recommended additional modeling at state and federal levels, "to determine reaction of the river system hydrology and reservoir capacities." One commenter anticipated the need for models to evaluate specific issues, including, "(1) water quality… (2) native and federally-listed fish species populations, and non-native invasive fish species populations… (3) riparian vegetation response… (4) HFEs and other flow regime effects on river channel structure, geomorphology, and sediment dynamics, (5) effects of variable flow regimes on river recreation through Grand Canyon, and reservoir recreation in Lakes Powell and Mead, and (6) exposure of cultural and paleontological resources." This commenter stated that models should also illustrate the beneficial effects of mitigation.

A commenter requested that Reclamation use, "CRSS modeling of scenarios that includes Glen Canyon Dam being operated at levels below what the dam is physically capable of currently." Lastly, commenters presented the likes of a "worst case alternative," suggesting that Reclamation rely on hydrologic modeling "of a greater than 20 percent reduction in flows" and "the inclusion of an operational option to release where outflow matches inflow, and suggested including a specific scenario, "with a 5-6M AFY reduction in water supply allocations in order to capture potential extreme drought and heat scenarios." Another suggested a scenario where annual flows at Lee's Ferry are 12.5 million acre-feet per year (AFY) or lower.

4.4.17.2 Assumptions

Commenters requested that Reclamation clarify its modeling methods, assumptions, and limitations, "so that the public and decisionmakers can understand whether the EIS's assumptions are substantiated," "how Reclamation reaches its conclusions," and "to ensure they account for the hotter, drier environment that the Basin is experiencing because of changing climate."

Many commenters had suggestions for refining the models used in the Post-2026 analysis. These suggestions included using the best available science and data, accounting for non-consumptive uses, accounting for climate change, changing mathematical functions and stochastic processes used in the existing models, and incorporating additional models.

4.4.17.3 Best Available Science and Data

Commenters encouraged Reclamation to "use high-quality information, incorporating the best available science and data, to describe reasonably foreseeable environmental trends and effects, including anticipated climate-related changes to the environment in its analyses and forecasting methodologies to quantify reservoir conditions, inflow projections, and operational decision-making." Other comments suggested using soil moisture station data, stream gauge data, and LiDAR to refine the accuracy of models. One commenter requested assistance to improve its "aircraft-based snowpack monitoring" and supporting its "precipitation forecasting," which are fundamental to the operations of Lake Powell. Another comment recommended consideration of other climate-related input data, such as, "increases in the fraction of precipitation falling as rain rather than snow, increased frequency of extreme weather events resulting in heavy precipitation and flooding, dust accumulation on snow, and changing soil moisture levels." Many commenters determined that Reclamations "24-month study" is unreliable, noting that it "overestimated inflows into Lake Powell and as a result often predicted reservoir elevations that were higher than what occurred in those years."

4.4.17.4 Climate Change

Commenters recommend that Reclamation, "use current, accurate data reflecting recent meteorological and runoff conditions, which have varied widely in recent years notwithstanding long-term, climate change-related decreases in overall precipitation and snowpack." Many commenters were concerned that the models based on historic data do not accurately account for climate change, particularly with "[m]ultiple low run-off years substantially drier than in the recent past." One commenter stated that, "[t]he current 30-year average is the only acceptable baseline for long-term planning," while another determined that the 30-year average, "has been proven to be

outdated and leaves water managers and stakeholders unprepared when a series of dry years reduces the volume of supply to the reservoirs."

4.4.17.5 Non-Consumptive Uses

Commenters suggested that Reclamation plan for non-consumptive uses for priority natural resources, which could be achieved through a "demand cushion," and requested that Reclamation account for evaporation, seepage, and system loss in the Lower Basin. Other commenters requested that Reclamation account for diversions, return flows, and depletions of Colorado River water in the Upper Basin states.

4.4.17.6 Temperature-Adjusted Ensemble

Commenters expressed concerns that the largest risk to water management is underestimating the potential severity of drought. "Of the hydrology ensembles currently under consideration from USBR, only the temperature adjusted scenarios (and potentially the new ensemble under development) seem to directly incorporate this signal without introducing significant uncertainties due to potential GCM and downscaling-derived artifacts related to precipitation." With this, commenters are seeking, "more robust projected temperatures to inform future risk of drought." One commenter recommended the "ensembles driven by temperature adjustments," (i.e., RCP4.5, RCP8.5) be primarily used to inform operations or to develop additional similar ensembles. Commenters expressed that the temperature adjusted ensembles, "provide a range of outcomes that could well be associated with continued temperature increases, and are more plausible than, for example, our continued use of the historic record without any adjustment." One comment suggested other ensembles (e.g., Paleo Record or Paleo Conditioned), "that potentially sample higher-end extremes, and expanding the temperature adjusted scenarios to include a wider range of temperature sensitivities, [and] could improve the representation of potential future flows to overcome these shortcomings." The comment concluded that, "the most important criterion … is that the hydrology ensembles must sample a wide enough range of plausible low-end flow scenarios to ensure … operational rules that are robust to the range of potential future droughts."

4.4.17.7 Wet Bias

Commenters expressed that Reclamation's forecasts used in the 2007 Interim Guidelines and the 2019 Drought Contingency Plan (DCP) relied on projected elevations forecasted 6 months in advance of operations and "consistently overestimate[s] Lake Powell elevations and underestimates Lake Mead elevations, resulting in greater releases from Glen Canyon" and warned against this for development of Post-2026 Operations. One comment noted the "long-term drying trend [is] likely to accelerate," and, "the hydrology ensembles on historical observations are likely to have a wet bias." Thus, it would be appropriate for Reclamation to, "remove or limit scenarios based on historic observations," and, "include more scenarios that account for warming." Another commenter mentioned that Reclamation "must consider hydrologic ensembles that represent drier conditions without dampening year-to-year variability and/or consider incorporating increases in year-to-year variability." One commenter explored the idea of Reclamation considering if existing "Most Probable" and "Max Probable" scenarios "obfuscate the likelihood of drier outcomes to Basin stakeholders."

Commenters also recommended Reclamation's modeling tools and process must be updated to incorporate the best available climate science, and to remove biases from past, wetter hydrology. In acknowledgement of our nonstationary climate, less focus should be given to probabilistic forecasting, which can give an unrealistic depiction of future possible conditions. One comment suggested that a downscaled climate model could introduce "artifacts" that are biasing general circulation model (GCM)-driven ensembles. Commenters want to ensure that Reclamation "fully understands the artifacts or clearly identify the nature of the artifacts on public facing materials." One comment specified that it will be important that the CRSS and Decision-Making under Deep Uncertainty processes not only include hydrology ensembles that reach reasonably low flows with realistic multi-year patterns, but also enough traces within those ensembles that occur at reasonably low flows to provide an appropriate distribution."

4.4.18 Water Quality

4.4.18.1 Human Health and Safety

Some comments about water quality were related to human health and safety, specifically regarding human contact/immersion with water, drinking water, and potable water. Comments pointed out that low water levels can increase the risk for "harmful algal blooms, elevated bacterial levels, and the potential for increasing populations and varieties of harmful parasites and pathogens, including thermophilic amoeba (naegleria spp.)." Comments also expressed concern about increased water temperatures affecting levels of E. coli (*Escherichia coli)*. Commenters requested that the EIS process include accurate modeling of future water levels and water quality and analysis of potential changes in water quality that are expected to occur from various proposed alternatives. One comment specifically requested that the EIS evaluate how changes in groundwater gradients near uranium mines on the Coconino Plateau may cause released uranium to migrate into Tribal groundwater resources.

4.4.18.2 Analysis of Impacts to Water Quality

Comments included specific details regarding the EIS analysis and recommended evaluation of the proposed alternatives' influences on and potential impacts to water quality parameters such as salinity, total dissolved solids, and soluble reactive phosphorus. Comments also suggested that Reclamation coordinate with industry experts to evaluate potential impacts to water quality. One comment expressing concern about salinity stated, "Changes to Colorado River management may change salinity of Colorado River water between Hoover Dam and the Northerly International Boundary . . . Changes to the salinity of Colorado River water will change Reclamation's management of Colorado River water deliveries to Mexico, with possible implications for water quality as well as timing." Another comment communicated that "…in 2022 the low water level in Lake Powell was linked to a plume of low dissolved oxygen concentration in Lake Mead. This suggests that the water quality in Lake Mead can be affected by conditions in Lake Powell and modeling and evaluation should acknowledge that linkage."

4.4.18.3 Fisheries and Water Temperature

A majority of the comments related to water quality focused on how the proposed alternatives could potentially impact water quality and in turn impact fisheries. Comments specifically expressed concern that changes to water salinity, temperature, and dissolved oxygen content could result in

impacts to fisheries. Comments mentioned specific fish species such as smallmouth bass, rainbow trout, and humpback chub. One commenter concerned about this topic shared, "Elevated water temperatures and low dissolved oxygen levels pose a threat to a number of downstream resources, including the establishment of non-native species such as Smallmouth Bass and impacts to native fish and the Rainbow Trout fishery at Lee's Ferry below Glen Canyon Dam." Another comment regarding water quality and fisheries stated, "The forecasted water conditions in the Colorado River basin will create less favorable conditions for Rainbow Trout… Negative effects are expected from sub-lethal warm water, as recent models suggest that the food base at Lees Ferry cannot sustain adequate Rainbow Trout growth rates at these warmer temperatures." Additional concerns regarding potential impacts to fisheries or fish habitat are discussed in the Wildlife section below.

4.4.19 Water Quantity

Commenters noted that water quantities in the Basin are likely to decline given current water modeling and historical trends, and as such, an additional emphasis must be placed on water levels. Numerous comments noted that adequate water levels must be maintained to preserve wetlands, fragile ecosystems, and other critical habitats in the Grand Canyon, Colorado River Delta, and Salton Sea. Another consistent theme was the desire for greater transparency around total and available water supply within the Basin, including one commenter who advocated for improved water quantification technology throughout the Basin, including "install[ing] additional gauges and water quantification instruments on as many streams, diversions, and ditches as possible; and provide funding and labor to ensure they are maintained."

Many comments addressed the direct correlation between decreased surface water supply and the Basin's increased dependence on groundwater resources. Commenters noted that unregulated or increased use of groundwater resources can have unintended consequences, including impacts to baseflow contributions to the Colorado River. One commenter requested that the EIS examine the potential for changes in the volume, storage, flow, and quality of groundwater using available characterization of groundwater resources and groundwater use during the alternatives identification process. Another commenter suggested Reclamation create or incentivize policies to protect groundwater resources Basin-wide, such as compensating water rights holders for leaving water allocations unused.

Increased reliance on groundwater resources had many other commenters concerned about the impact to rural and Tribal well production throughout the Basin. One commenter noted that less productive wells from overdrawing groundwater resources threatens public health and safety, particularly in environmental justice communities, and suggested that the EIS evaluate increases in groundwater use may impact discharges at Tribal springs.

4.4.20 Water Rights and Agreements

4.4.20.1 Conditional Water Rights

One commenter discussed Colorado's Conditional Water Rights, asserting that the state of Colorado allows for conditional water rights, and that "The main issue here is not how old some of these rights are, but the sheer volume of water associated with these rights. A study conducted by Western Resource Advocates in 2009 found that nearly two-million acre-feet of water was being held in a conditional status by oil shale production companies (greater than the entitlement owed to Mexico).

If all these rights begin diverting water, it will be an issue for Colorado, and potentially the entire Colorado River Basin. Conditional water rights could greatly complicate the ability of Colorado to adhere to its allotment and meet its obligations under the Colorado River Compact. We encourage the Bureau to discuss the issue of conditional water rights with Colorado to understand how Colorado is planning for the potential that those rights could be put to beneficial use in the years to come. We also suggest that the NEPA analysis for the post-2026 operating guidelines should clearly disclose this issue and describe how it has been addressed in the alternatives and analysis of environmental impacts."

4.4.20.2 EIS Analysis and Development of Post-2026 Operational Guidelines

Commenters expressed concerns that designations and allocations of water rights will be based on historically wet periods, leading to overharvesting of the river. Commenters also stated that new designations and allocations need to be made based on the lowest precipitation years, not the highest, and that Reclamation should develop a EIS exercises "its full authority to manage the Colorado River System in a fair and equitable manner that stabilizes operations by addressing the imbalance between supply and demand within the Colorado River System."

Additional topics that were suggested for inclusion in the EIS included the following:

- Ensure that any alternative considered in the EIS respects Imperial Valley's senior water rights.
- Analyze whether alternatives are consistent with the 1922 Colorado River Compact non-depletion obligations and delivery obligations to Mexico. Alternatives should include actions necessary to ensure compliance with such obligations.
- Analyze an equitable spread of reductions in the Lower Basin amongst all water users in three Lower Basin States to help stabilize the system. Reclamation should consider and analyze the impact of actions to be taken by the Upper Basin States, such as shortage reductions and continued DROA (Drought Response Operations Agreement) releases.
- Implement operating strategies to stay within current Colorado River Compact apportionment based on efficiencies, conservation, and infrastructure improvements, rather than on migration of water resources from the Upper to Lower Basin; specifically prohibit the severing of a water right located and beneficially used in the Upper Basin through sale and transportation to a Lower Basin location.
- Provide a 10-year rolling average of water allocations, offering credit for unused water which is made available to junior priority users and avoiding single-year overrun payback.
- Incorporate the legal parameters governing the Colorado River and inform the Colorado River's stewardship in a changing climate, while providing for the operational certainty, planning and investment necessary by all water users in the Basin to adapt to the hydrologic conditions that are anticipated to occur beyond 2026.
- Consider permitting the leasing of water between states and basins while preserving their long-term rights.
- Require compensated contributions from the Upper Basin to aid in transitioning the Lower Basin away from a consumptive use utilization for their allocation.

- Protect agricultural water supplies.
- Safeguard the priority right system memorialized in the Colorado River Compact of 1922, longstanding federal laws, intrastate agreements, and Supreme Court rulings.
- Abolish the privatization of water.
- Prioritize the protection of the nation's Southern Arizona Water Rights Settlement Act of 1982 entitlement and the farming resources that supply it and undertake the investigation and analysis necessary to ensure that any potential shortage strategy or reservoir protections do not negatively impact this entitlement and these resources.
- Do not assume that any cuts in water usage can be applied based on recent levels of consumption (as the draft Supplemental Environmental Impact Statement modeled) rather than based on contractual levels of entitlement.
- Ensure that the scope of analysis for Post-2026 operations include an evaluation and disclosure to the public of which users might receive a favorable exercise of that discretion, why, and with what environmental effects.
- Apply 43 Code of Federal Regulations 417 to ensure water deliveries are not being wasted.

4.4.20.3 Glen Canyon Dam

One commenter stated that Glen Canyon Dam is incapable of meeting delivery obligations at low levels, adding that "at elevation 3,430, the dam is physically incapable of releasing enough water annually to meet Upper Basin delivery obligations, based on current interpretations of the Law of the River." The commenter went on the state that "failure to deliver these agreed upon amounts could result in technical, legal, engineering, and environmental problems for all members of the Basin. While the Upper Basin Delivery obligation of 7.5-million-acre feet per year (and 75 million acre feet over ten years), is a cornerstone of the Law of the River, it should be noted that ongoing policy discussions around the Law of the River argue that this interpretation should be updated and that it is unrealistic for the "75 in 10" policy to continue as is32. Nevertheless, it is unclear what changes the Law of the River may undergo in the future, and it's likely that Glen Canyon Dam's structural limitations hinder the system's ability to adapt to those change."

Another commenter discussed allocations affirmed by the Supreme Court, stating, "United States Supreme Court affirmed the division of the Lower Basin's entitlement to 7.5 maf of mainstream Colorado River water with 4.4 maf allocated to California, 2.8 maf allocated to Arizona and 300 kaf allocated to Nevada. Arizona v. California, 373 U.S. 546 (1963). The Court issued a Decree and an injunction requiring the Secretary to, among other things, deliver 7.5 maf of water to users in Arizona, California and Nevada "pursuant to valid contracts therefor made with such users by the Secretary of the Interior, pursuant to Section 5 of the Boulder Canyon Project Act or any other applicable federal statute." 2006 Consolidated Decree, Arizona v. California, 547 U.S. 150, 156 (2006). The Decree and injunction also govern the Secretary's distribution of water during surplus, normal and shortage conditions."

4.4.20.4 Law of the River

Commenters stated that Reclamation must comply with the Law of the River, and that Reclamation must account for the Law of the River and priority system to avoid analyses, conclusions, or

proposed alternatives that would be illegal or infeasible and that would accordingly fail to comply with NEPA's requirements. Commenters also stated that Post-2026 operations should be developed under the legal framework of the 1922 Colorado River Compact, the 1928 Boulder Canyon Project Act, the 1964 Arizona v. California Supreme Court decree, and the 1968 Colorado River Basin Project Act (43 United States Code 1521(b)), the Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande, the Treaty Between the United States of America and Mexico, Treaty Series 994 (59 Statute 1219), the Colorado River Storage Project Act, the Consolidated Decree entered by the Supreme Court of the United States in Arizona v. California (547 U.S. 150 [(2006]), and other statutes and minutes that comprise the Law of the River. One commenter challenged Reclamation's authority to alter the priority system within the Law of the River. Additionally, multiple commenters stated that the Law of the River, 1922 Colorado River Compact, the 1948 Upper Colorado River Basin Compact, and the 1944 Treaty with Mexico must be the foundation for the Post-2026 operations, and that by following the Law of the River, Reclamation would be fulfilling its obligations to Administrative Procedures Act SS 706(1).

Conversely, commenters stated that "development of the post-2026 guidelines is a key opportunity to acknowledge the errors in the foundational underpinnings of the Law of the River, begin[ning] the process to transition away from those rules." One commenter discussed that the Law of the River does not include or integrate the whole value of the river or the environment, such as the Grand Canyon Protection Act of 1992, which "is not typically considered as part of the "Law of the River," nor are other environmental and cultural protections (e.g., the Endangered Species Act, the Natural Historic Preservation Act, the Clean Water Act, the Wild and Scenic Rivers Act, among others), and intermingling policies that meet the needs of water users and, at the same time, mitigate damage to the environment is essential in development of Post-2026 Operations. Commenters also stated that foundational objectives of Post-2026 operations need to be modified beyond the "narrow and outdated goals of the Law of the River."

4.4.20.5 San Luis Rey Water Rights Settlement

One commenter stated that "The Congressional mandate to permanently furnish 16,000 acre-feet per year of conserved water to the San Luis Rey Settlement Implementing Parties for the Settlement and to fulfill the United States' trust responsibility to the Tribes cannot – and must not – be diminished or affected by any new Environmental Impact Statement or the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead." One commenter also provided a history of the San Luis Rey Water Rights Settlement.

4.4.20.6 Senior Water Rights

One commenter suggested that Reclamation "drop concept of "senior water rights"" and reassess who really has the most senior water rights. Commenters also expressed concerns that California has a senior right, but perhaps not the "sole senior right to the exclusion of the other Lower Basin states" and that "California does not want to let go of their "senior" water rights from the original 1922 Colorado River Compact…" Additionally, Commenters also expressed concerns that during water cuts between Basin States over the past 2 years, California did not participate in, nor comply with the cuts that were taking place. Another commenter stated that Western water law needs to be revised as "California has too much power based solely on the good fortune of geography that allowed them to become 1st in time, 1st in right. It's not right if you are Colorado or Wyoming or other more junior lessor 'users'."

4.4.20.7 Tribal Water Rights

Commenters asked that Reclamation acknowledge the possibility of Tribes within the basin utilizing the entirety of the water rights they are entitled to, regardless of current population or development on tribally owned land. Commenters also added that "any plan moving forward needs to guarantee the ability for all federally recognized tribes within the basin to settle with the states for their water rights and to build the infrastructure in place to access them." Commenters also expressed that the Department of Interior should ensure that Tribes receive support for independent analysis of the impact that any proposed modifications or alternatives will have on their individual water rights and interests, both immediately and in the longer term, which would require frequent and meaningful consultation with individual tribes whose interests are likely to be affected as alternatives are developed. Respect for Tribal water rights and timely engagement of Tribal representatives was also expressed by multiple commenters. One commenter stated that their Nation has settled water rights to more than 45,000 acre-feet of Colorado River water as well as claims related to other river systems.

One commenter also stated that failure by Reclamation and the Secretary to "adopt the protections we propose for tribal water rights, or a comparably effective set of protections, would subordinate the senior legal priority of tribal water rights under the Winters doctrine to legally junior non-Indian uses." This commenter also stated that Reclamation and the Secretary "should not allow the United States in the 2020s to repeat the appalling derelictions of its trust responsibility that occurred a century ago. Accordingly, the Hualapai Tribe strongly urges the Department to require any final plan on Colorado River operations after 2026 to provide protection and security to the CAP water allocations that Arizona tribes have received in congressionally approved water rights settlements, such as the protections we have proposed in these comments." Lastly, one commenter highlighted Executive Order 14096, stating that "Tribes have been historically excluded from river governance, apportionment decisions and federal developments and to this day tribal water rights remain unresolved, inaccessible, or unquantified" and noting that tribal communities have "junior (4^{th} priority) water rights" and that "Because tribal water rights are tied to the CAP priority date and delivery system, available water could be reduced to zero depending on shortage levels." This commenter also recommended that Reclamation acknowledge "historic and present inequities or systemic barriers to indigenous water rights. Discuss policies, programs or funding opportunities specifically designed to correct or remove inequities or barriers; provide tribes with more clarity; maintain or construct infrastructure for the delivery of or access to Colorado River water for tribal use; or develop replacement water resources."

4.4.21 Wildlife

4.4.21.1 Birds

Comments emphasized that protecting birds is of utmost importance because climate change and human influences have already reduced populations and thus Reclamation needs to be "militant and protect in every way possible the birds we have left." Commenters specifically requested protection for migratory birds as the "Colorado River plays a critical role in their lifecycle" as the "river, wetlands, and adjacent forests along the banks create essential habitat for hundreds of species of resident and migratory birds." One comment pointed out the "Colorado River is part of the Western/Pacific Flyway and as such, is needed to ensure the survival of…migratory birds."

Comments cited the need for protection of specific bird species that "are unique and iconic" including the yellow-breasted chat, canyon wren, summer tanager, bald eagle, and yellow warbler, and that the "Colorado River provides essential habitat for…endangered species such as the California condor, Southwestern willow flycatcher," yellow-billed cuckoo, and Yuma Ridgway's rail (Yuma clapper rail). Several commenters suggested Reclamation should ensure the protection of federally endangered birds. Two commenters noted that the endangered Yuma Ridgway's rail should be protected, as it uses the "marshes fed by drains from the Imperial Irrigation District and Coachella Valley Water District." Specifically, one commenter noted that "Reclamation's metrics for evaluating management actions…must be able to assess impacts to: habitats managed for endangered species as well, such as the Upper Colorado River Basin and San Juan Recovery Implementation Programs and the Lower Colorado River Multi-Species Conservation Program." One comment noted that the federally threatened Mexican spotted owl has been observed in an emerged side canyon of Grand Canyon National Recreation Area in 2022 and should be considered as well.

4.4.21.2 Fish

Several comments addressed potential impacts to federally listed fish species in the Colorado River. One comment pointed out that "three of eight native mainstem Colorado River fish (Colorado pikeminnow, bonytail chub, roundtail chub) have been extirpated from Grand Canyon and four more (humpback chub, razorback sucker, flannelmouth sucker, and bluehead sucker) require intensive management to avoid serious decline. Changes in all aspects of the natural flood regime threaten the survival of riparian and aquatic species and should be analyzed including flow magnitude, frequency, duration, timing, and rate of change across hourly to century scales." One comment suggested that "threatened and endangered fish below Hoover Dam may be impacted by changed flows" and agency coordination would be required. Another comment suggested that Reclamation "must consider threatened and endangered fish in other segments of the river…if DROA or similar flows are considered out of Flaming Gorge or Aspinall Dams, Reclamation should harmonize those flows with experimental fish flows including the Razorback Sucker Larval Trigger Study Plan, smallmouth bass flow spikes, and pikeminnow base flows and analyze the impacts."

Additional species-specific concerns included comments that reinforced the need for protection of Desert pupfish from "potential population collapse" due to changing operations, and protection of the humpback chub, which "needs a sustainable, diverse, and productive food base" within the Colorado River. Comments also suggested Reclamation "design an alternative that proactively…protects the humpback chub from drawing close to extinction" and analyze impacts of the proposed alternatives on the federally endangered razorback sucker population in Lake Mead, stating that "Lower water levels may have positive or negative effects on this population depending on the interactions between warmer water, reduced habitat, changing water depth, dissolved oxygen concentration, non-native invasive fish species, and quagga mussels."

Commenters identified the need for Reclamation, the USFWS, and the NPS to analyze, monitor, and plan for the survival and recovery of threatened and endangered species occupying and/or re-occupying newly emergent portions of Glen Canyon and its tributaries. As noted by one commenter, the "Colorado River could be managed through Grand Canyon National Park as stronghold for endangered fish recovery." Furthermore, "as aridification continues and Lake Powell recedes, rapid recovery of newly emergent canyon-bottom riparian habitats and their associated aquatic ecosystems will be occupied and re-occupied by threatened and endangered species."

The comment further stated that "declining lake levels would likely expand or increase habitat for Colorado pikeminnow, razorback sucker, flannelmouth sucker, and bluehead sucker in the inflows to Lake Powell as riverine habitat would increase in the San Juan River and Colorado River inflows."

4.4.21.2.1 Invasive Fish Species

Most of the comments addressing fish expressed concern about the impacts of non-native fish, such as smallmouth bass and catfish, on native fish populations with emphasis on the Grand Canyon reach of the Colorado River. Several commenters were also concerned about potential impacts from the growing smallmouth bass population that pass through the Glen Canyon Dam and imperil their designated critical habitat. One comment noted "high water temperatures coming through Glen Canyon Dam and the increased risk of fish entrainment due to low water elevations are the driving factors for establishment of smallmouth bass and other high risk non-native fish downstream of the dam." Commenters propose that both water temperature and entrainment "can be influenced and managed by operations at Glen Canyon Dam." Comments "requested that Reclamation develop a full suite of alternative operations and infrastructure enhancements that disadvantage high risk non-native species and reduce their establishment potential. This will help protect healthy self-sustaining native fish populations." Commenters suggested "the use of screens or other dam modifications to prevent the passage of non-native fish through Glen Canyon Dam and into the Grand Canyon." A comment recommends that "…the EIS must fully consider the need for screens under all operations scenarios, especially as it relates to impacts on the endangered humpback chub and its critical habitat."

4.4.21.2.2 Rainbow Trout Fishery

One comment pointed out that the "current conditions and projected water levels will prohibit effective management of the rainbow trout fishery and high-risk non-native fish species in the Colorado River." The commenter recommends "use of the bypass tube at Glen Canyon Dam," which will "facilitate long-term temperature release control while minimizing water storage/power loss." The commenter also recommended Reclamation "identify fish deterrents or exclusion mechanisms to reduce entrainment of warm water high risk non-native fish through the dam." Additional concerns regarding potential impacts to rainbow trout are discussed in the Water Quality section above.

4.4.21.2.3 Natural Barriers to Protect Native Fish

Comments noted that changes in elevation at Lake Mead and Lake Powell have in the past, and could in the future, "change at what reservoir levels barriers are formed or removed that may restrict movement of native and non-native fish." Comments pointed out that "barriers [such as Cataract Canyon at the top end of Lake Powell or the San Juan arm of Lake Powell] may appear or disappear at different water levels." Commenters cited the example of Pearce Ferry, "where rapids have formed with Lake Mead being at a lower level" creating "100km of aquatic habitat upstream of the lake" that may be preventing invasive fish from moving up into the Grand Canyon and preying on native fish; changing water levels may increase or decrease that barrier." The same comment noted that "Pearce Ferry is a rare contemporary example of native fish populations regaining dominance over invasive fishes in the desert southwest." Conversely, commenters noted that low reservoir levels above Glen Canyon "are allowing warmer waters into the CRE in Grand Canyon that benefit non-native species."

4.4.21.3 General Wildlife

Comments coded to Wildlife included comments related to birds, plants, pollinators, and other "key species." Over 50% of the comments advocated for Reclamation "to protect the Colorado River and the many creatures that depend on it" and "recognize the vital role the river plays in providing and sustaining critical habitat for birds and other wildlife." Many comments also mentioned climate change and human impacts to wildlife and advocated for protecting wildlife for the sake of humans.

4.4.21.4 Habitat Protection

Several comments requested protection of riparian habitat, requesting that Reclamation ensure "long-term water availability for birds and wildlife that are dependent on that river, its tributaries and its riparian corridors" and that these habitats "add to the ecological integrity of the Colorado River system" and provide "streamside habitat for threatened and endangered species such as Southwestern willow flycatchers and yellow billed cuckoo." Comments related to bird habitats also advocated for the protection of birds in specific Colorado River habitats including the Grand Canyon, Lower Colorado River, Salton Sea, Colorado River Delta, National Wildlife Refuges along the Colorado River and its tributaries, irrigated agricultural lands, and Cienega de Santa Clara in Mexico. Furthermore, comments stated that these habitats "need sustained water in order to protect America's most unique and iconic bird species…more than one third of all wildlife in the region visit the Colorado River's remaining wetlands and riparian forests during their lifecycle, including 400 different bird species." One commenter suggested "using a wholistic approach that takes into account the important role that birds play in balancing ecosystems." Commenters also noted the importance of riparian habitat even though it is not abundant – "the narrow riparian corridor along the river itself provides habitat--quality habitat that is far more important than the relatively meager acreage it represents."

Additionally, commenters pointed out that specific protection is needed for habitats that lack a secure water supply and called for the protection of specific wildlife habitats (such as the Grand Canyon, the Lower Colorado River, the Salton Sea, and wetlands in the Colorado River Delta) as it relates to water supplies.

4.4.21.4.1 Riparian Habitat Protection in Glen Canyon

Comments requested Reclamation "acknowledge the extensive resources that have emerged in Glen Canyon. As the reservoir has dropped, significant riparian ecosystems and wildlife habitats have emerged, which provide immense value…this must be protected and not undone by future policy." Additionally, several comments emphasized that "Reclamation, the USFWS, and NPS must analyze, monitor, and plan for the survival and recovery of threatened and endangered species occupying and/or re-occupying newly emergent portions of Glen Canyon and its tributaries. As aridification continues and Lake Powell recedes, rapid recovery of newly emergent canyon-bottom riparian habitats and their associated aquatic ecosystems will be occupied and re-occupied by threatened and endangered species."

4.4.21.4.2 Protection of the Cienega de Santa Clara Marsh Habitat

Several comments suggested the need for protection of flows to the Cienega de Santa Clara in Mexico as "it receives 90 percent of its inflows from a canal that transports water first used to irrigate farms in Yuma, Arizona…and ultimately provides water for wetlands and marshes in the

Colorado River Delta used by hundreds of thousands of water birds as winter habitat." One commenter urged Reclamation to "ensure models examine and predict how water reductions will affect the amount of water draining from Imperial Irrigation District and Coachella Valley Water District irrigation drains - the analysis should include the location and acreages of existing marshes at the end of those drains and how water reductions may change the size and location of the marshes and how that could impact resident Desert pupfish and Yuma Ridgway's rail as existing marsh areas dry."

4.5 Form Letters

Seven form letters were received (see Appendix D). The sections below summarize each letter.

4.5.1 Form Letter 1

Form Letter 1 represented 1,573 identical submittals and 196 submittals that contained personal sentiments in addition to the form text. Form Letter 1 asks Reclamation to consider recreation interests on Lake Powell, Lake Mead, and other reservoirs when developing the EIS. The letter supports the BlueRibbon Coalition's "Path to 3588' Plan" and asks that the target elevation of Lake Powell be above the proposed hydropower target of 3,525 feet to allow for better recreation access. The letter also describes the economic benefits of recreation to the communities surrounding the reservoirs and cites the NPS estimate that recreation from Lake Mead and Lake Powell generate $500 million each year in the communities surrounding the reservoirs.

4.5.2 Form Letter 2

Form Letter 2 represented 19,468 identical submittals and 981 submittals that contained personal sentiments in addition to the form text. Form Letter 2 asks Reclamation to protect wildlife habitat when developing the EIS. The letter references the Grand Canyon, the Lower Colorado River Multi-Species Conservation Program, the Salton Sea, and wetlands in the Colorado River Delta as places of important bird habitat sustained by the Colorado River. The letter also asks Reclamation to analyze how wildlife habitats will change with climate change.

4.5.3 Form Letter 3

Form Letter 3 represented 51 identical submittals and 58 submittals that contained personal sentiments in addition to the form text. Form Letter 3 asks Reclamation to analyze two alternatives in the EIS: 1) bypass Glen Canyon Dam and 2) Fill Lake Mead First. In the bypass Glen Canyon Dam alternative, Lake Powell would be used as a back-up storage reservoir and the river would be able to flow naturally down river. In the Fill Lake Mead First alternative, the letter suggests that Lake Powell should not be filled past 3,550 feet. The letter also asks Reclamation to include impacts to newly exposed resources in Glen Canyon in alternatives that raise water levels in Lake Powell.

4.5.4 Form Letter 4

Form Letter 4 represented six identical submittals. Form Letter 4 is quoted below:

"Don't forget the SALTON SEA in your planning. Import Ocean water to the Salton Sea. Colorado River water cuts without ocean water imports will destroy the Salton Sea."

4.5.5 Form Letter 5

Form Letter 5 represented 193 identical submittals and 13 submittals that contained personal sentiments in addition to the form text. Form Letter 5 asked Reclamation to develop a Grand Canyon restoration alternative that analyzes decommissioning and bypassing Glen Canyon Dam and maintaining only Lake Mead as a storage reservoir. The letter also asked that the following solutions be included in the EIS: stopping all new dams, diversions, and pipelines; enacting water conservation programs; having 10% of Colorado River flows reach the Colorado River Delta; allocating Native American water rights from current diversions; and using a percentage-based water allocation model.

4.5.6 Form Letter 6

Form Letter 6 represented 10 identical submittals and eight submittals that contained personal sentiments in addition to the form text. Form Letter 6 asked Reclamation to prioritize household, community, and wildlife water use over agriculture water use.

4.5.7 Form Letter 7

Form Letter 7 is Western Resource Advocates' Five Principles for Governing the Colorado River petition, which 357 individuals signed in support. The Five Principles for Governing the Colorado River asks Reclamation to focus on conserving water, improving river flows, and engaging stakeholders such as the Colorado River Basin Tribes, impacted people, and conservation groups. See Appendix D for the full list of principles listed in the form letter.

Chapter 5 Proposed Federal Action and Purpose and Need

Reclamation considered the information and comments received during the scoping period in the development of the anticipated purpose and need, scope of analysis, and proposed federal action.

5.1 Proposed Federal Action

The Bureau of Reclamation, acting on behalf of the Secretary of the Interior (Secretary), proposes to take action to adopt specific guidelines and coordinated reservoir management strategies to address operations of Lake Powell and Lake Mead through their full operating range. This action would provide improved predictability to all water users and managers in the Colorado River Basin by developing and adopting objective guidelines for the operation of Glen Canyon Dam and Hoover Dam to take effect when the current operating guidelines (the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead [2007 Interim Guidelines]) expire in 2026.

In addition, this action is designed to provide for the sustainable management of the Colorado River system and its resources under a wide range of potential future system conditions due to a changing climate.

Based on public input, the Department anticipates the guidelines would include the following elements:

1. Identification of circumstances under which the Secretary would allocate, reduce, or increase the annual amount of water available for consumptive use from Lake Mead to the Lower Division states (Arizona, California, and Nevada) at, below, or above 7.5 million acre-feet, pursuant to the Supreme Court Decree in *Arizona* v. *California.*[1]
2. Coordinated operations of Lake Powell and Lake Mead, particularly under low reservoir conditions.
3. Storage and delivery of conserved water in Lake Mead and/or Lake Powell to increase the flexibility to meet water use needs from both reservoirs, including the storage and delivery of non-system water; exchanges; and water conserved through extraordinary measures by or for tribal, agricultural, or municipal entities.

The proposed federal action allows for development of robust operating guidelines for Lake Powell and Lake Mead without precluding upstream or downstream actions needed to protect critical reservoir elevations at Lake Powell and Lake Mead, such as the following:

- Approaches that consider total system storage in all major Colorado River reservoirs and/or actual inflows to determine coordinated operations of Lake Powell and Lake Mead.

[1] The Department intends to meet any consultation requirements identified in Article II(B)(3) of the Supreme Court Decree in Arizona v. California through the ongoing NEPA process initiated by the Federal Register Notice of June 16, 2023 (88 FR 39455-39458) and the annual implementation of guidelines developed through this process.

- Approaches that include opportunities for conservation, augmentation, demand management, or other water management strategies.
- Temporary emergency response operations at upstream Colorado River reservoirs to protect critical infrastructure at Glen Canyon Dam, so long as the project-specific operations of those reservoirs remain within their respective Records of Decision.

The Department intends that the guidelines be interim in nature and extend for at least the same duration as the 2007 Interim Guidelines (approximately 20 years), subject to further consideration during the NEPA process. Adoption of new guidelines for an interim (or limited) period provides the opportunity to gain additional experience for operating the reservoirs, thereby informing future operational and water management decisions.

Recognizing additional authorities may be developed, it is the intent of the Department to adopt and implement the guidelines in a manner consistent with the Law of the River.[2] It is also the intent of the Department that the guidelines be used to implement the Criteria for Coordinated Long-Range Operation of Colorado River Reservoirs Pursuant to the Colorado River Basin Project Act of September 30, 1968 (LROC).

5.2 Purpose and Need

In accordance with NEPA implementing regulations, a statement of purpose and need is required in an EIS to explain why the agency is proposing the action. The "need" for the action may be described as the underlying problem or opportunity to which the agency is responding with the action; the "purpose" may refer to the goal or objective that the agency is trying to achieve (43 CFR 46.420).

The proposed federal action is needed for the following reasons:

- The Secretary is legally required to coordinate operations of Colorado River reservoirs: The Colorado River Basin Project Act of 1968 directs the Secretary to propose criteria for the coordinated long-range operation of Colorado River reservoirs. In compliance with this obligation, the LROC were developed and adopted by the Secretary in 1970. The LROC provide general narrative guidance regarding Lake Powell and Lake Mead operations but does not contain specific, objective criteria to guide annual operations. To address this inadequacy, the 2007 Interim Guidelines were developed to provide objective criteria used by the Department to implement the LROC. These guidelines have provided predictability needed by the entities that receive Colorado River water to better plan for and manage available water supplies from the Colorado River and other sources.

[2] The treaties, compacts, decrees, statutes, regulations, contracts, and other legal documents and agreements applicable to the allocation, appropriation, development, exportation, and management of the waters of the Colorado River Basin are often referred to as the "Law of the River." There is no single, universally-agreed upon definition of the "Law of the River," but it is useful as a shorthand reference to describe this longstanding and complex body of legal agreements governing the Colorado River.

- 2007 Interim Guidelines are expiring: Current operational guidelines expire during the 2026 operating year. The Department has determined that specific, objective operational guidelines are important to provide improved predictability and should be established for another interim period beyond 2026.
- 2007 Interim Guidelines have not sufficiently reduced risk: Based on operational experience since 2007, the current guidelines are not robust enough to manage in a way that is sufficiently protective of the resources dependent on the Colorado River. Despite near-continuous drought-response actions in recent years, low-reservoir conditions have persisted and new infrastructure risks at Glen Canyon Dam have arisen. More robust and adaptive guidelines are needed for the efficient and sustainable management of the major mainstream Colorado River reservoirs and system resources.
- Imbalance between water supply and demand will be exacerbated by increasingly likely low-runoff conditions: Climate science indicates the Colorado River Basin is experiencing climate-change induced aridification and that long-term and sustained drought and low-runoff conditions should be expected in the future. These conditions will exacerbate the now widely recognized imbalance between water supply and demand in the Colorado River Basin. Robust and flexible guidelines are needed to manage the Colorado River system and its resources under a broad range of potential future hydrologic conditions.
- Expanded and innovative use of conservation is needed: Recognizing the anticipated future low-runoff conditions in the Colorado River Basin, the Department has also determined a need for guidelines that provide Colorado River water users, including Basin Tribes, expanded opportunities to conserve, store, and take subsequent delivery of water in and from Lake Mead and/or Lake Powell. The guidelines should also support and integrate future efficiency improvements and opportunities for augmentation.
- Addressing tribal concerns regarding Colorado River Basin management is needed: Basin Tribes have expressed concern that the current approach to Colorado River water management is insufficient to address the range of interests, needs, and fundamental rights of the Basin Tribes. The Department has determined a need for guidelines that provide flexibility and predictability for Basin Tribes to remain able to benefit from their water rights and have an opportunity to participate in voluntary conservation programs.

The purpose for the proposed federal action is to:

- update and expand management guidelines for Colorado River reservoirs, particularly for Lake Powell and Lake Mead;
- provide Colorado River water users, a greater degree of predictability with respect to the amount of annual water available in future years under anticipated increasing variability, low runoff and low reservoir conditions;
- provide additional mechanisms for the conservation, storage and delivery of water supplies in Colorado River reservoirs;
- provide new or enhanced opportunities for Basin Tribes to benefit from their water rights; and

- provide flexibility to build resilience and accommodate future needs and growth that are supported by Colorado River water supplies, including the integration of unquantified tribal water rights once they are resolved.

5.3 Future Steps in the NEPA Process

The Department is now transitioning to the next phase of the NEPA process, which is to develop alternatives for analysis in the draft EIS. Reclamation has developed state-of-the-art web-based tools to encourage and facilitate stakeholder collaboration during this phase and intends to deploy these tools in the early stages of this phase in the fall. It is the Department's intent that these tools support the exploration and development of a broad range of reasonable alternatives and foster collaborative consensus-based approaches to alternative development.

The draft EIS will consider the best scientific information currently available; actual operating experience since 2007; updated information on infrastructure considerations at Glen Canyon Dam and Hoover Dam; trade-offs between the frequency and magnitude of reductions in water deliveries; mechanisms to encourage water conservation, efficiency improvements, and augmentation; and the effect of water storage in Lake Powell and Lake Mead on water supply, power production, recreation, environmental resources, cultural resources, and other relevant resources and factors. The geographic scope of the environmental analysis in the draft EIS is dependent upon the range of alternatives developed in the draft EIS and therefore will be determined later in the NEPA process.

We sincerely appreciate the substantial and thoughtful input submitted by Basin Tribes and States, stakeholders, organizations, and citizens as part of this scoping phase and are committed to providing future opportunities for further participation in upcoming phases of the Post-2026 process.

APPENDIX A

Notice of Intent

and not competing requests. California State University, Sacramento is responsible for sending a copy of this notice to the Indian Tribes identified in this notice.

Authority: Native American Graves Protection and Repatriation Act, 25 U.S.C. 3003, and the implementing regulations, 43 CFR 10.9, 10.10, and 10.14.

Dated: June 6, 2023.

Melanie O'Brien,

Manager, National NAGPRA Program.

[FR Doc. 2023–12857 Filed 6–15–23; 8:45 am]

BILLING CODE 4312–52–P

DEPARTMENT OF THE INTERIOR

Bureau of Reclamation

[RR03040000, 23XR0680A1, RX187860005004001]

Notice of Intent To Prepare an Environmental Impact Statement and Notice To Solicit Comments and Hold Public Scoping Meetings on the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice and request for comments.

SUMMARY: The Secretary of the Interior (Secretary) has directed the Bureau of Reclamation (Reclamation) to develop post-2026 Colorado River reservoir operational guidelines and strategies for Lake Powell and Lake Mead (referred to as ''post-2026 operations''). Several important reservoir and water management decisional documents and agreements that govern operation of Colorado River facilities and management of Colorado River water are currently scheduled to expire at the end of 2026. Through this **Federal Register** notice, Reclamation is formally initiating the process to prepare an environmental impact statement (EIS) for the development of post-2026 operations.

DATES: This **Federal Register** notice initiates the public scoping process for the EIS. Reclamation requests that the public submit comments concerning the scope of specific operational guidelines, strategies, and any other issues that should be considered on or before August 15, 2023.

Reclamation will host three virtual public meetings/webinars to provide summary information and receive oral comments:

- Monday, July 17, 2023, 1 p.m. to 2 p.m. (MDT)
- Tuesday, July 18, 2023, 10 a.m. to 11 a.m. (MDT)
- Monday, July 24, 2023, 6 p.m. to 7 p.m. (MDT)

ADDRESSES: Please send written comments pursuant to this notice to *crbpost2026@usbr.gov* or Bureau of Reclamation, Attn: Post-2026 (Mail Stop 84–55000), P.O. Box 25007, Denver, CO 80225.

The registration link for the webinar held on Monday, July 17, 2023, is *https://swca.zoom.us/webinar/register/WN_-_hvFoMcRJ-I98k4n7-GvQ,* or the dial in option (audio only) is (602) 753–0140 or (720) 928–9299; Webinar ID: 918 5524 0606.

The registration link for the webinar held on Tuesday, July 18, 2023, is *https://swca.zoom.us/webinar/register/WN_sbSwzBJhQ66Z-E65TGXX1g,* or the dial in option (audio only) is (602) 753–0140 or (720) 928–9299; Webinar ID: 963 7946 3234.

The registration link for the webinar held on Monday, July 24, 2023, is *https://swca.zoom.us/webinar/register/WN_r0ozNRpmRu-hmEpYxe0-Qg,* or the dial in option (audio only) is (602) 753–0140 or (720) 928–9299; Webinar ID: 949 1587 3150.

FOR FURTHER INFORMATION CONTACT: Amanda Erath, Colorado River Post-2026 Program Coordinator, Bureau of Reclamation, at (303) 445–2766, or by email at *crbpost2026@usbr.gov.* Please also visit the project website at *https://www.usbr.gov/ColoradoRiverBasin/Post2026Ops.html.* Individuals in the United States who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services. Individuals outside the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States.

SUPPLEMENTARY INFORMATION: This document provides notice that Reclamation intends to prepare an EIS for post-2026 operations and conduct public scoping. Reclamation is issuing this **Federal Register** notice pursuant to the National Environmental Policy Act of 1969, as amended (NEPA), 42 U.S.C. 4321 *et seq.;* the Council on Environmental Quality's regulations for implementing NEPA, 43 CFR parts 1500 through 1508; and the Department of the Interior (Department or Interior) NEPA regulations, 43 CFR part 46.

Background

The Colorado River Basin has been in a prolonged period of drought and low-runoff conditions, and despite current projections of 2023 runoff being well above average, the period from 2000 through 2023 is currently estimated as the second driest period in more than a century and one of the driest periods in the last 1,200 years. From 2000 to 2004, Lake Powell and Lake Mead lost nearly half of their combined storage. The onset of this period of acute drought spurred the development of the 2007 Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines). Over the past 15 years since the adoption of the 2007 Interim Guidelines, as drought and low-runoff conditions continued, additional responsive actions were needed to complement the 2007 Interim Guidelines (*e.g.,* 2019 Colorado River Basin Drought Contingency Plan (DCP)). At the end of 2026, a number of reservoir and water management decisional documents and agreements that govern the operation of Colorado River facilities and management of the Colorado River are scheduled to expire. These include the 2007 Interim Guidelines, the DCP, and other important management documents within the United States, as well as Minute 323 between the United States and Mexico pursuant to the United States-Mexico Treaty on Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande (1944 Water Treaty).

Since 2021, the Department has undertaken several actions to protect critical infrastructure in response to declining reservoir elevations and the deepening of drought conditions from 2020 to 2022. As the summer of 2022 ended with near record low elevations in Lake Powell and Lake Mead, the Department recognized that, absent a change in hydrologic conditions, water use patterns, or both, Colorado River reservoirs would continue to decline to critically low elevations before the 2007 Interim Guidelines expired. In order to modify guidelines for the operation of Glen Canyon and Hoover Dam for the remainder of the interim period (through 2026) to address these historic drought and low runoff conditions in the Basin, the Department initiated a NEPA process on November 17, 2022, to prepare a Supplemental Environmental Impact Statement (SEIS) for Near-term Colorado River Operations. The draft SEIS was released for public review on April 14, 2023. In light of the Lower Basin states' consensus-based system conservation proposal submitted on May 22, 2023, the Department temporarily withdrew the draft SEIS so

that it can fully analyze the effects of the proposal under NEPA. Reclamation intends to publish an updated draft SEIS for public comment with the consensus-based proposal as an action alternative and finalize the SEIS process later this year.

Recognizing the need to begin to develop long-term strategies for Colorado River operations while simultaneously addressing the current drought conditions and preparing for the potential of continuing low runoff and low reservoir conditions, the Department published a **Federal Register** notice on June 24, 2022 (87 FR 37884), related to post-2026 operations. In that **Federal Register** notice, the Department specifically requested public input on procedural approaches to developing the post-2026 operational strategies (process) and potential substantive elements of post-2026 operations. In response, the Department received substantial input from States, Tribes, water districts, non-governmental organizations, and the public. The input received has been summarized in a ''Pre-Scoping Summary Report'' (Available at *https://www.usbr.gov/ColoradoRiverBasin/documents/Post-2026_Pre-Scoping%20Comment%20Summary%20Final_Updated1.30.2023_508.pdf*) and is being considered and integrated into this NEPA process. This NOI follows that important early opportunity for public input, and formally initiates the post-2026 NEPA process.

With respect to the relationship between the ongoing SEIS process and the post-2026 process, the November 2022 **Federal Register** notice was clear that the SEIS: ''does not interfere with, supplant, or supersede that separate post-2026 guidelines development process. Rather, this SEIS will inform and complement the development of post-2026 guidelines.'' The SEIS is focused on limited sections of the 2007 Interim Guidelines to develop the operational tools necessary to address potential extreme drought conditions during the 2024 to 2026 timeframe. In contrast, the post-2026 process will address the subsequent timeframe and revisit all sections of the 2007 Interim Guidelines and other operating agreements that expire in 2026 (*e.g.,* the DCP). The appropriate scope of post-2026 operations will be determined after conclusion of the public scoping process.

The June 2022 **Federal Register** notice for pre-scoping for post-2026 operations anticipated ''that near-term response actions and development of post-2026 operations will need to proceed on parallel timelines.'' The SEIS and post-2026 processes are now underway and proceeding simultaneously as predicted. Every effort will be made to provide clear and timely information regarding the milestones for public engagement in the post-2026 process to minimize the stakeholder and public burden of tracking and engaging in both efforts.

Purpose of This Notice of Intent

To assure the continued stability of the Colorado River system into the future, Reclamation announces its intent to prepare an EIS for post-2026 operations and is now soliciting public comments on the scope of specific operational guidelines, strategies, and any other related issues that should be considered in the upcoming EIS.

Reclamation invites all interested members of the public, including the seven Colorado River Basin States, Tribes, water and power contractors, representatives of the agricultural industry, municipal water providers, environmental organizations, representatives of the recreation industry, representatives of academic and scientific communities and other organizations and agencies to provide oral and written comments. Reclamation anticipates publishing a ''scoping report'' after completion of the public scoping meetings and the close of the comment period identified in this **Federal Register** notice.

All comments received will be considered as Reclamation develops the proposed federal action, Purpose and Need, and scope of the analysis (*e.g.,* affected area, geographic scope, time horizon/term). Similar to operational guidelines currently in place, it is likely that the post-2026 operational guidelines will be interim. Despite their interim nature, it is the Department's intent that these operational guidelines and strategies are sufficiently robust and adaptive and can withstand a broad range of future conditions thereby providing greater operational and planning stability to water users and the public throughout the Colorado River Basin.

June 2022 Request for Input on Development of Post-2026 Colorado River Operational Strategies

In response to the June 2022 pre-scoping **Federal Register** notice, Reclamation heard from over 80 stakeholders and partners as well as over 2,000 members of the public. As noted above, in January 2023, Reclamation published a ''Pre-Scoping Comment Summary Report'' on its website describing and summarizing the input received and hosted a public outreach event on January 30, 2023, to communicate the findings.

The input received in response to the June 2022 **Federal Register** notice included a broad range of comments and suggestions, not all of which can be addressed in this proposed process or described in this NOI. In addition, some suggestions may be part of ongoing or future efforts. However, some widely expressed themes related to the nature of future operational guidelines and strategies are actively being considered in our approach during the early stages of planning for this NEPA process:

- Future operational guidelines and strategies must support proactive management to improve system stability and avoid continuously managing in response to crises. To achieve this, future operational guidelines and strategies must be capable of both withstanding a broad range of future hydrologic and operating conditions and minimizing system vulnerability, *i.e.,* they must be more robust and adaptive than current strategies.
- Future operational guidelines and strategies should incorporate a more holistic approach to Colorado River water management in a way that focuses on the long-term sustainability of both the Basin's population and natural environment, minimizes system vulnerability, and increases system resiliency.
- Coordinated operation of Lake Powell and Lake Mead is one of multiple ways that the system can be managed. Alternative paradigms, *e.g.,* basing reservoir operations on combined reservoir or system storage, should be explored.

Structure of the 2007 Interim Guidelines and Operating Experience

The purpose of the 2007 Interim Guidelines was determined in the early stages of the NEPA process to develop the 2007 Interim Guidelines and consists of three components. As stated in Section IV of the 2007 Interim Guidelines, the purpose is to:

- ''improve Reclamation's management of the Colorado River by considering trade-offs between the frequency and magnitude of reductions of water deliveries, and considering the effects on water storage in Lake Powell and Lake Mead, and on water supply, power production, recreation, and other environmental resources;
- provide mainstream United States users of Colorado River water, particularly those in the Lower Division states, a greater degree of predictability with respect to the amount of annual water deliveries in future years,

particularly under drought and low reservoir conditions; and

• provide additional mechanisms for the storage and delivery of water supplies in Lake Mead to increase the flexibility of meeting water use needs from Lake Mead, particularly under drought and low reservoir conditions.''

Despite the additional agreements and actions undertaken since the adoption of the 2007 Interim Guidelines and ongoing processes, the four elements of the 2007 Interim Guidelines, collectively intended to meet the purpose, have remained intact. These elements are:

• *Shortage Guidelines:* Determines those conditions under which the Secretary would reduce the annual amount of water available for consumptive use from Lake Mead to the Lower Division states below 7.5 million acre-feet pursuant to the Consolidated Decree.

• *Coordinated Reservoir Operations:* Defines the coordinated operations of Lake Powell and Lake Mead to provide improved operation of these two reservoirs, particularly under low reservoir conditions. As described in Section XI.G.6. of the Record of Decision, the objective of the operation of Lake Powell and Lake Mead is ''to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin.''

• *Storage and Delivery of Conserved Water:* Allows for the storage and delivery, pursuant to applicable federal law, of conserved Colorado River System and non-System water in Lake Mead to increase the flexibility of meeting water use needs from Lake Mead, particularly under drought and low reservoir conditions.

• *Surplus Guidelines:* Determines those conditions under which the Secretary may declare the availability of surplus water for use within the Lower Division states. Modifies the substance of the Interim Surplus Guidelines existing at the time the Guidelines were adopted by extending the term from 2016 to 2026 and terminating the most permissive provision.

The interim nature of the 2007 Interim Guidelines provided the opportunity to gain valuable experience in the management of Lake Powell and Lake Mead, improving the basis of understanding for future operational decisions. First implemented in 2008, Reclamation now has over 15 years of operational experience under the 2007 Interim Guidelines. Section XI.G.7.D. of the 2007 Interim Guidelines required the documentation of this experience and an evaluation of the effectiveness of the 2007 Interim Guidelines. In fulfilment of this provision, in December 2020, Reclamation published on its website ''Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead'' (Available at *https://www.usbr.gov/ColoradoRiverBasin/#7.D.Review*) (the 2020 7.D. Review).

The 2020 7.D. Review found that while the 2007 Interim Guidelines were effective at meeting their overall purpose, the increasing severity of the drought and prolonged period of low runoff demonstrated that the 2007 Interim Guidelines were insufficiently robust to protect reservoir storage, requiring the adoption of the DCPs and other responsive adaptive actions, both within the United States and in cooperation with Mexico.

The 2020 7.D. Review also documented important considerations for enhancing future effectiveness: (1) enhanced flexibilities and transparency for water users; (2) expanded participation in conservation and Basin-wide programs; (3) increased consideration of the linkage that occurs through coordinated reservoir operations, particularly with respect to the uncertainties inherent in model projections used to set operating conditions; and (4) more robust measures to protect reservoir levels.

Following the publication of the 2020 7.D. Review, as low snowpack and runoff conditions worsened, Reclamation undertook emergency and other drought response actions in 2021 and 2022 to protect infrastructure and operations at Glen Canyon Dam. In the November 2022 **Federal Register** notice, the Department found that due to the existence of ''extraordinary circumstances'' per Section 7.D of the 2007 Interim Guidelines, modified operating provisions may be required in order to ensure Glen Canyon Dam continues to operate under its intended design and to protect Hoover Dam operations, system integrity, and public health and safety and initiated the ongoing SEIS process.

Considering the past 15 years of operating experience, the findings described in the 2020 7.D. Review, the themes expressed in response to the June 2022 **Federal Register** notice, and the information included in this NOI; Interior is interested in receiving specific input on how the purpose and the elements of the 2007 Interim Guidelines should be retained, modified or eliminated to provide greater stability to water users and the public throughout the Colorado River Basin through robust and adaptive operational guidelines. This input will be used to inform our decision on the proposed federal action, Purpose and Need, and scope of the analysis (*e.g.,* affected area, geographic scope, time horizon/term).

Elements of Process Designed to Date

In the June 2022 **Federal Register** notice, Reclamation identified that it intends to design and implement a stakeholder process for this EIS that is inclusive, transparent, and encourages meaningful engagement. Using the input received during that comment period and correspondence from Basin partners, Reclamation is in the early stages of developing certain components of its engagement and outreach approaches.

With respect to developing alternatives, input received in response to the June 2022 **Federal Register** notice suggested that Reclamation expand beyond its traditional methods of engagement and requested an inclusive process that encourages collaboration and supports the exploration of a broad range of creative operational strategies. To this end, and among other potential approaches, Reclamation is working with experts to develop a web-based tool that enables users with different levels of technical skill to explore, create, and compare potential operating strategies to enhance development of alternatives. The use of this common, accessible platform is just one part of Reclamation's stated goals of improving stakeholder and partner knowledge and engagement that supports external parties in developing strategies and provides the public greater and more timely access to relevant technical information.

In anticipation of the target Fall 2023 launch of the tool, Reclamation has convened an Integrated Technical Education Workgroup that is actively working to ensure that stakeholders are better prepared and able to engage in a robust alternatives development process. While it is valuable during this comment period to communicate ideas about the concepts and structures that could be included in alternatives, it is not necessary to submit comprehensive alternatives before the more focused period of alternatives development begins this fall.

With respect to the timing and structure of outreach during the NEPA process, Reclamation intends to develop an approach that facilitates inclusion at multiple levels and enhances tribal engagement and inclusivity. This structure for partner, stakeholder and public engagement will include individualized outreach, leverage existing groups and forums, create new

groups and forums, and provide for clear and timely communication with the public.

Through the individualized partner and stakeholder outreach, Reclamation will be available for meetings upon request and will prioritize regular, meaningful, and robust consultation with Tribal Nations. Existing forums and groups will be continued and leveraged, such as the monthly Reclamation-hosted Tribal Information Exchanges. Reclamation is also exploring options for increasing tribal involvement through the potential development of new groups and forums. In addition to timely and clear communication with the public at regular NEPA milestones, Reclamation intends to set up a broad partner-stakeholder group to ensure a full understanding of each upcoming step in the NEPA process.

As discussed in the June 2022 **Federal Register** notice, the Department is also committed to identifying processes that can complement the efforts of the International Boundary and Water Commission (IBWC) to develop post-2026 agreements that would succeed current agreements contained in Minute 323 to the 1944 Water Treaty. The Department will continue to coordinate with the IBWC to ensure Interior-led domestic planning processes are implemented in a coordinated and complementary fashion to those of the IBWC with a goal of ensuring similar timelines for informed decision making.

Public Disclosure of Comments

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Maria Camille Touton,

Commissioner, Bureau of Reclamation.

[FR Doc. 2023–12923 Filed 6–15–23; 8:45 am]

BILLING CODE 4332–90–P

DEPARTMENT OF THE INTERIOR

Bureau of Safety and Environmental Enforcement

[Docket ID BSEE–2023–0005; EEEE500000 234E1700D2 ET1SF0000.EAQ000; OMB Control Number 1014–0015]

Agency Information Collection Activities; Unitization

AGENCY: Bureau of Safety and Environmental Enforcement, Interior.

ACTION: Notice of information collection; request for comment.

SUMMARY: In accordance with the Paperwork Reduction Act (PRA) of 1995, the Bureau of Safety and Environmental Enforcement (BSEE) proposes to renew an information collection.

DATES: Interested persons are invited to submit comments on or before August 15, 2023.

ADDRESSES: Send your comments on this information collection request (ICR) by either of the following methods listed below:

- Electronically go to *http://www.regulations.gov.* In the Search box, enter BSEE–2023–0005 then click search. Follow the instructions to submit public comments and view all related materials. We will post all comments.
- Email *kye.mason@bsee.gov,* fax (703) 787–1546, or mail or hand-carry comments to the Department of the Interior; Bureau of Safety and Environmental Enforcement; Regulations and Standards Branch; ATTN: Nikki Mason; 45600 Woodland Road, Sterling, VA 20166. Please reference OMB Control Number 1014–0015 in the subject line of your comments.

FOR FURTHER INFORMATION CONTACT: To request additional information about this ICR, contact Nikki Mason by email at *nikki.mason@bsee.gov* or by telephone at (703) 787–1607. Individuals in the United States who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services. Individuals outside the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States. You may also view the ICR at *http://www.reginfo.gov/public/do/PRAMain.*

SUPPLEMENTARY INFORMATION: In accordance with the PRA and 5 CFR 1320.8(d)(1), all information collections require approval under the PRA. We may not conduct, or sponsor and you are not required to respond to a collection of information unless it displays a currently valid OMB control number.

As part of our continuing effort to reduce paperwork and respondent burdens, we invite the public and other Federal agencies to comment on new, proposed, revised, and continuing collections of information. This helps us assess the impact of our information collection requirements and minimize the public's reporting burden. It also helps the public understand our information collection requirements and provide the requested data in the desired format.

We are especially interested in public comment addressing the following:

(1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;

(2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

(4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.,* permitting electronic submission of response.

Comments that you submit in response to this notice are a matter of public record. We will include or summarize each comment in our request to OMB to approve this ICR. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Abstract: BSEE must approve any lessee's proposal to enter an agreement to unitize operations under two or more leases and for modifications when warranted. We use the information to ensure that operations under the proposed unit agreement will result in preventing waste, conserving natural resources, and protecting correlative rights including the government's interests.

APPENDIX B

Scoping Notice

From: Bureau of Reclamation
To:
Subject: Post-2026 Colorado River Operations Notice of Intent Now Available
Date: Friday, June 16, 2023 8:17:14 AM

— BUREAU OF —
RECLAMATION

Today Reclamation published a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the development of post-2026 Colorado River reservoir operations. This NOI formally initiates the post-2026 process under the National Environmental Policy Act by starting the scoping period and seeks public comment that will be considered as Reclamation develops the proposed federal action, purpose and need, and the scope of the analysis for post-2026 operations.

Several important reservoir and water management decisional documents and agreements that govern operation of Colorado River facilities and management of Colorado River water are currently scheduled to expire at the end of 2026. These include the 2007 Interim Guidelines, the 2019 Upper and Lower Basin Drought Contingency Plans (DCPs), and several agreements with Mexico under Minute 323 to the 1944 Water Treaty with Mexico.

The NOI requests comments concerning the scope of specific operational guidelines, strategies and any other issues that should be considered in the development of post-2026 operations and specifically requests input on how the purpose and elements of the 2007 Interim Guidelines should be retained, modified, or eliminated to provide greater stability to water users and the public through more robust and adaptive operational guidelines. Reclamation anticipates publishing a “scoping report” summarizing the formal input received soon after the close of the comment period on August 15, 2023.

Reclamation invites all Colorado River Basin partners, stakeholders and interested members of the public to provide oral and written comments.

Reclamation will host three virtual public meetings to provide summary information and receive oral comments:

- Monday, July 17, 2023, 1 p.m. to 2 p.m. (MDT)
- Tuesday, July 18, 2023, 10 a.m. to 11 a.m. (MDT)
- Monday, July 24, 2023, 6 p.m. to 7 p.m. (MDT)

Each virtual public meeting will cover the same material. Meeting interpretation will be available in Spanish. To register for a virtual public meeting, please visit the project website: https://www.usbr.gov/ColoradoRiverBasin/post2026/index.html.

For additional information on the project background, please refer to the Federal Register notice and the project website at: https://www.usbr.gov/ColoradoRiverBasin/post2026/index.html.

Reclamation requests that the comments are submitted on or before August 15, 2023. Comments can be submitted via the following:

- Email to: crbpost2026@usbr.gov
- Telephone: (602) 789-3889
- Webform
- Verbally at the virtual public meetings
- Mail to:

    Bureau of Reclamation
    Attn: Post-2026 (Mail Stop 84-55000)
    P.O. Box 25007
    Denver, CO 80225

For further information, please contact Amanda Erath, Colorado River Post-2026 Program Coordinator, Bureau of Reclamation, at (303) 445-2766 by email at crbpost2026@usbr.gov.

APPENDIX C

Scoping Meeting Materials

BUREAU OF RECLAMATION

Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Public Scoping Meeting

July 2023

BUREAU OF RECLAMATION

Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Virtual Public Scoping Meetings – July 17, 18, and 24, 2023

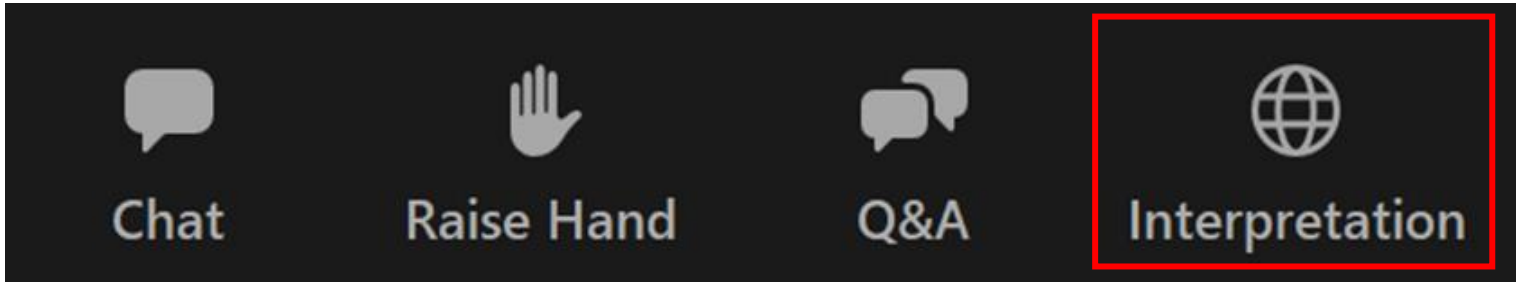
The meeting will begin at 1:00 p.m., MDT

La interpretación en vivo será disponible en español. Live interpretation will be available in Spanish.

Dial In: (720) 928-9299 or (602) 753-0140; Webinar ID: 918 5524 0606

For technical support, please contact Jessica Sams: jessica.sams@swca.com

La interpretación en vivo está disponible en español



Live language interpretation is available in Spanish

Public Scoping Meeting Agenda

- Introductory Remarks and Welcome
- Presentation
- Public Comment
- Closing Remarks

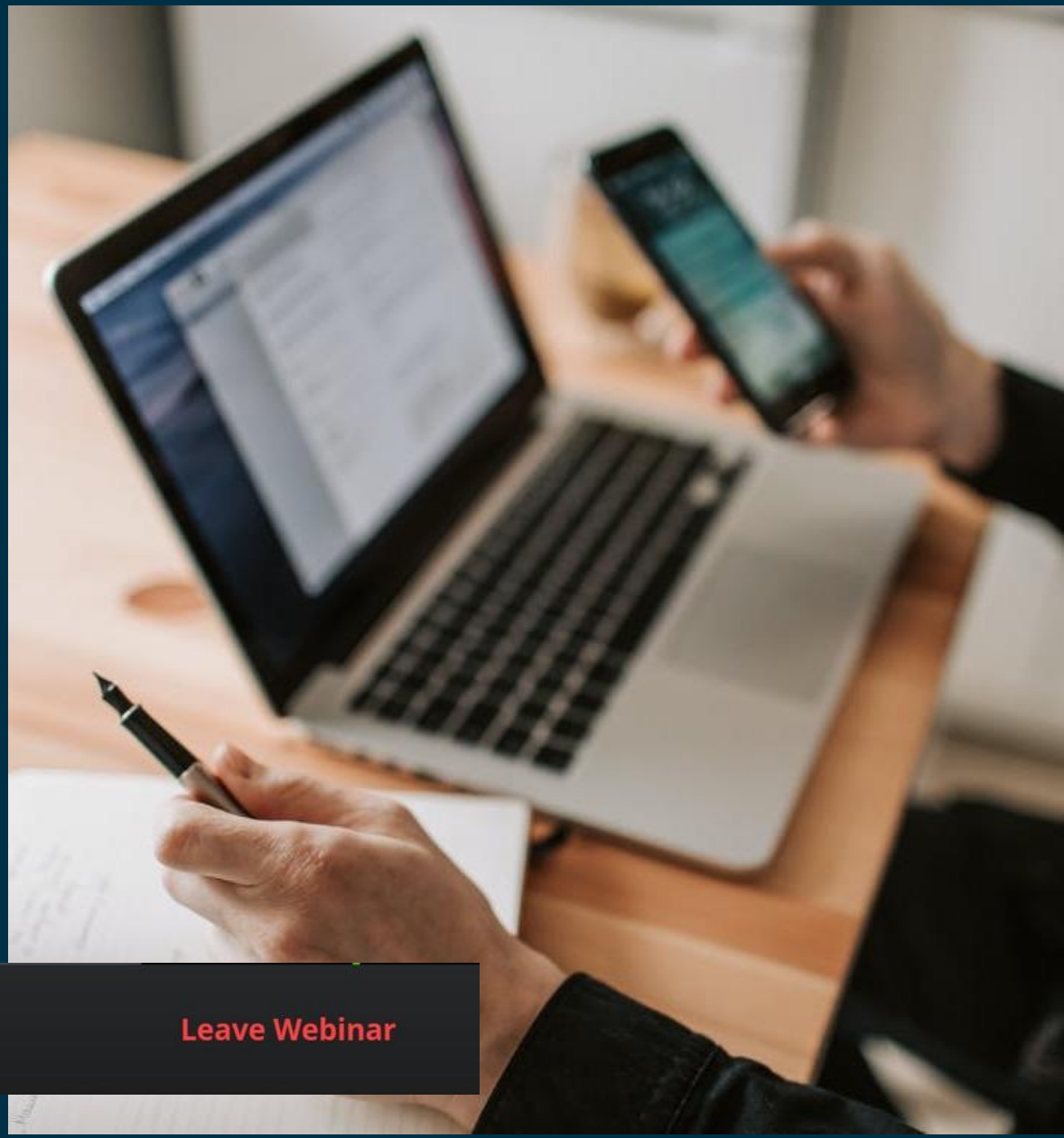
Zoom Orientation

Webinar is being recorded

Microphones are muted

Chat feature is turned off

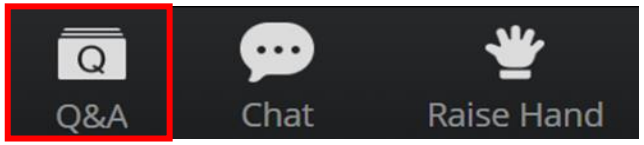
Submit comments using Q&A during the Public Comment Period



Questions about the Presentation?

How to submit a question

- Click the Q&A button
- A box will pop up
- Type your question
- Click send
- Responses to questions will appear in the Q&A box



Questions are not part of the project record

Welcome

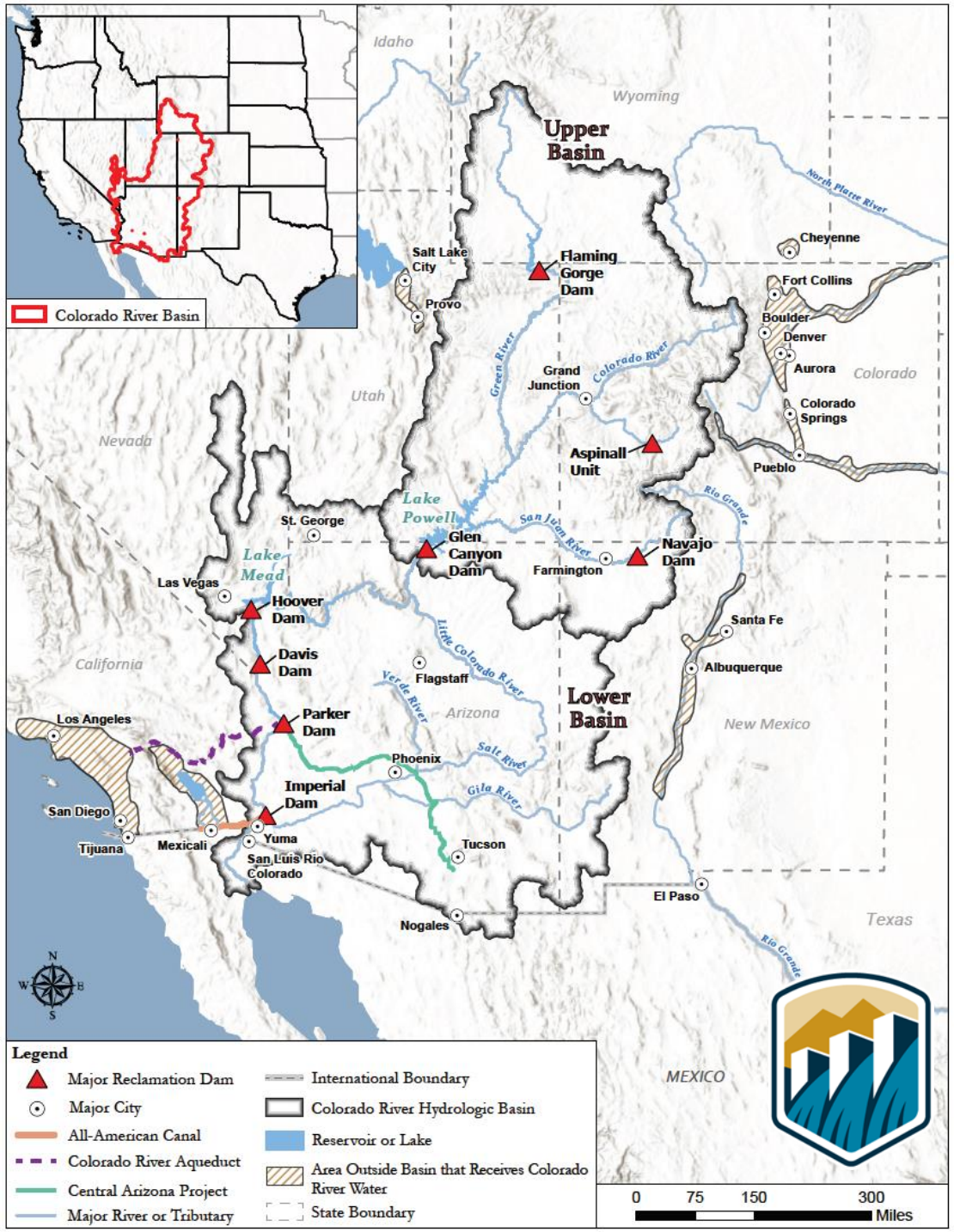
Camille Calimlim Touton, Commissioner
Bureau of Reclamation

OVERVIEW

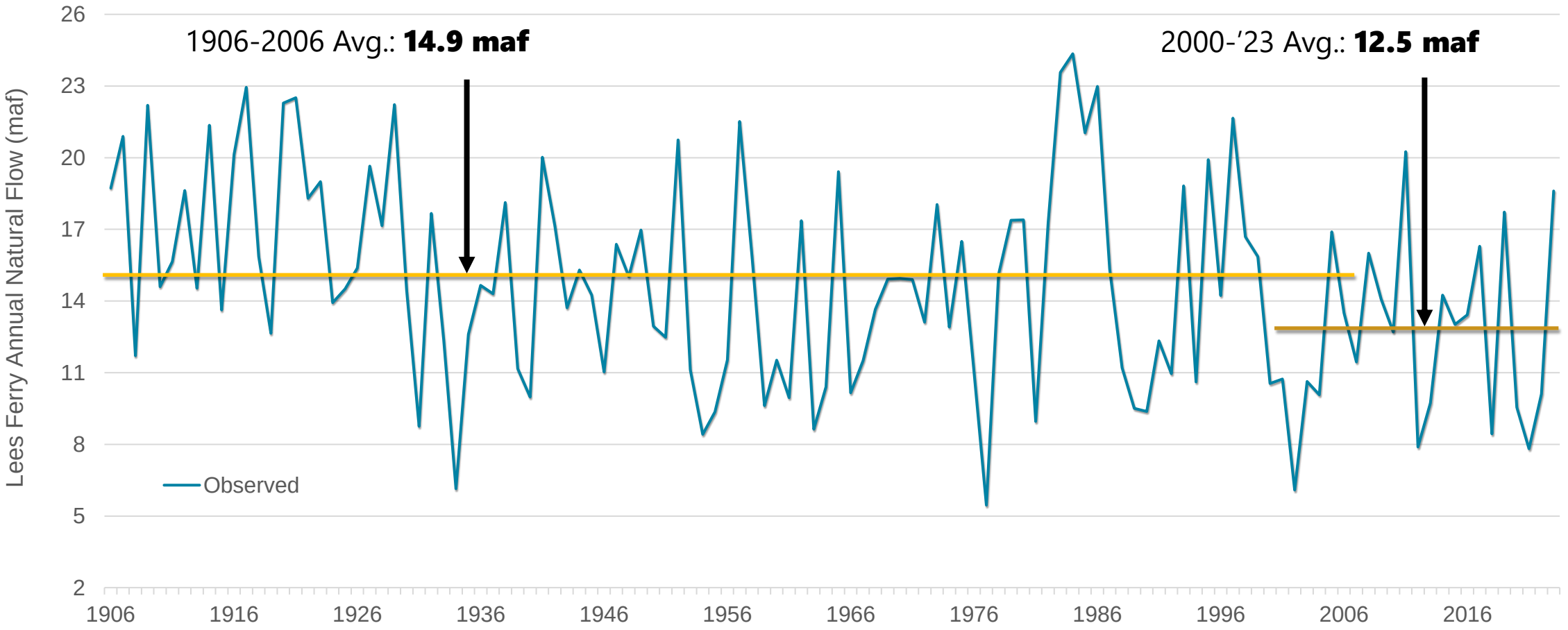
- Background, Need, Setting
- Key Operational Agreements
- Process

Operational Setting

- Colorado River system provides water for 7 States, 30 Basin Tribes, and Mexico
- Dams and reservoirs on the river can store nearly 4 years' water supply and generate 4,200 megawatts of hydropower
- Two largest reservoirs in the system have the capacity to store 60 million acre-feet of water
  - Lake Powell – formed by Glen Canyon Dam
  - Lake Mead – formed by Hoover Dam
- Several operating agreements that govern the operation of Lake Powell and Lake Mead expire at the end of 2026



Hydrologic Conditions



Hydrologic Conditions

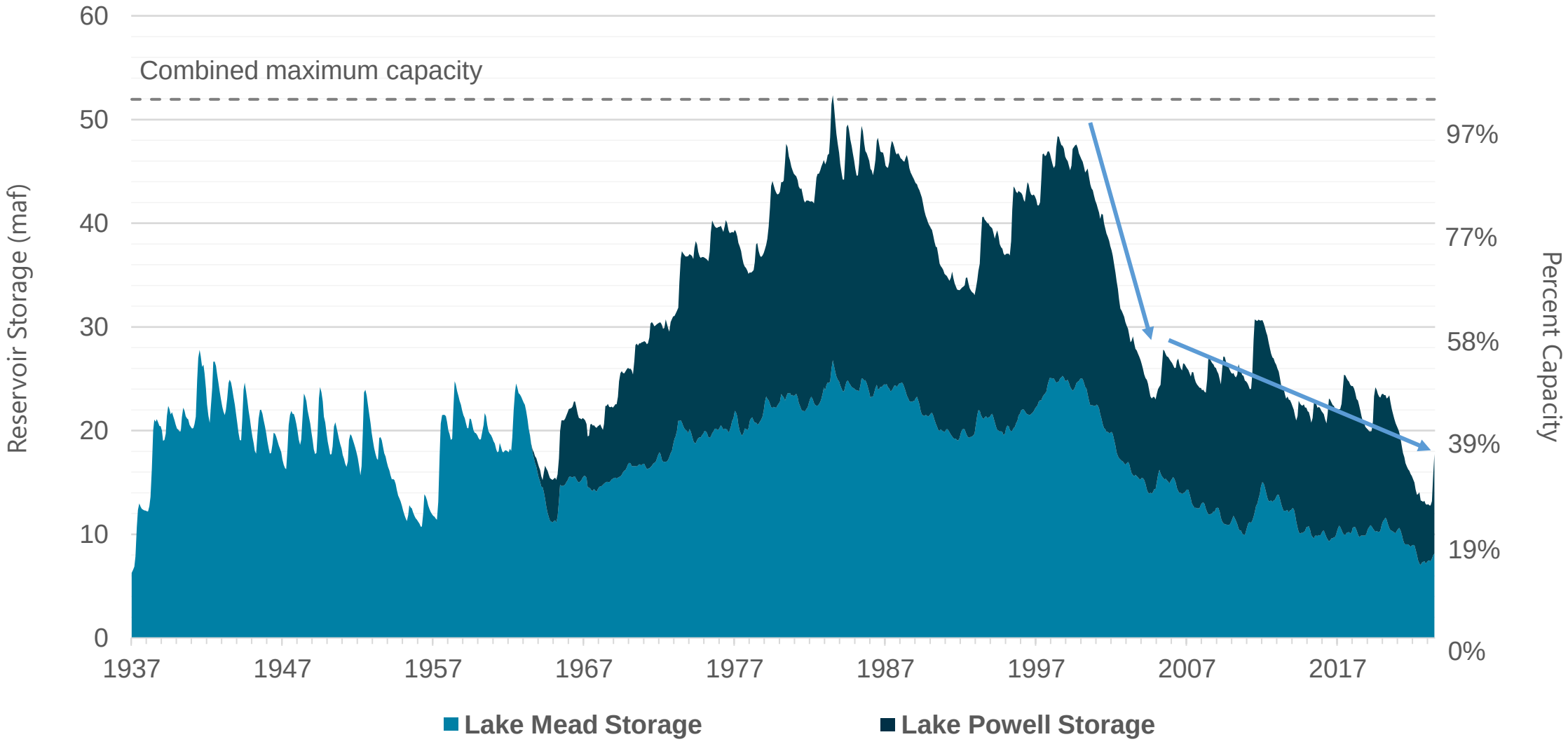
Long-term average when the Interim Guidelines were developed in 2007

14.9 maf

12.5 maf

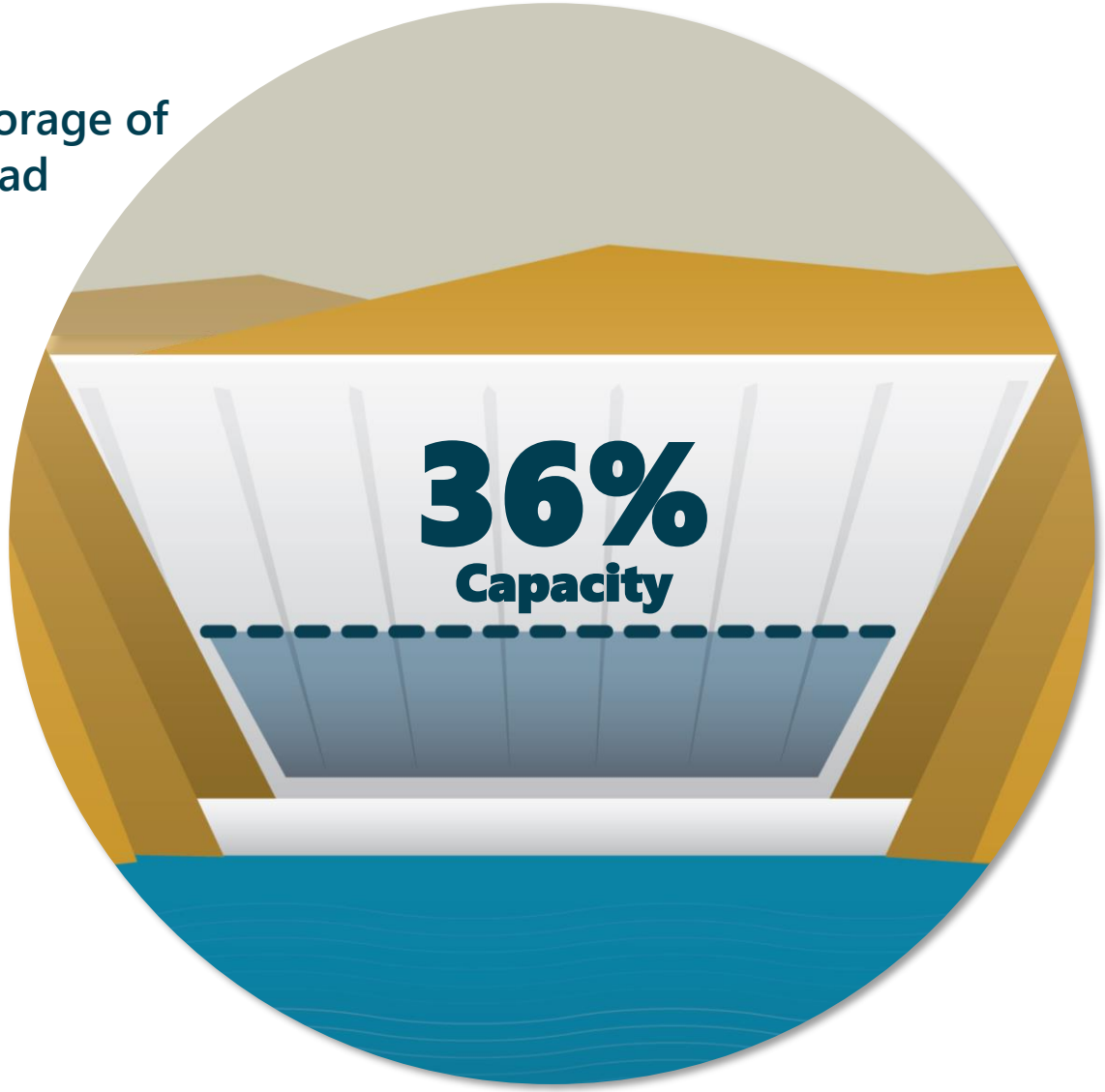
Recent approximate 20-year average – more indicative of future conditions

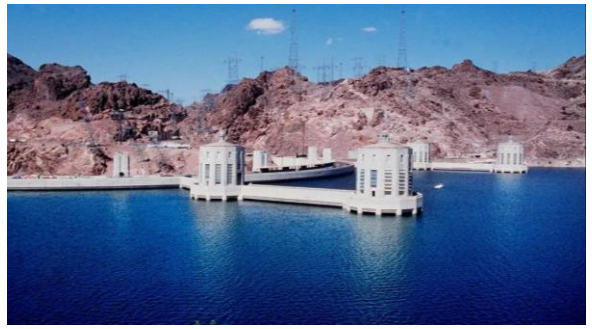
System Response



System Response

Current combined storage of Lakes Powell and Mead

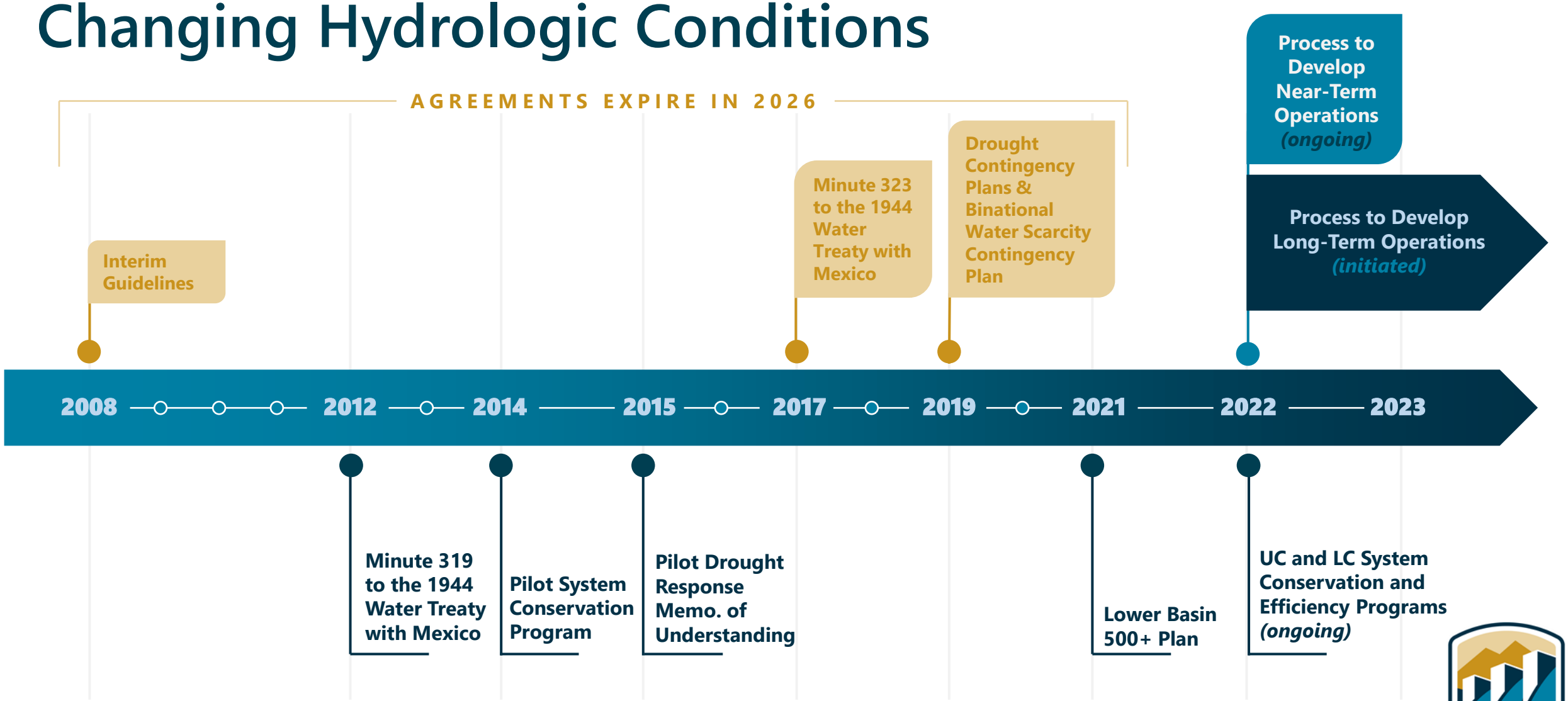




Photos: Lake Mead nears full capacity in June 1983 - Las Vegas Review-Journal

Photos: Water Levels in Lake Mead Reach Record Lows in April 2022 - The Atlantic

Operational Response to Changing Hydrologic Conditions



Long-term vs. Near-term Planning Processes

	NEAR-TERM COLORADO RIVER OPERATIONS (SEIS)	LONG-TERM COLORADO RIVER OPERATIONS (POST-2026)
PLANNING EFFORT		
RANGE OF OPERATIONS	Limited sections of the 2007 Interim Guidelines; Develop the operational tools needed to address extreme drought and low water levels.	Revisit all sections of the 2007 Interim Guidelines and other operating agreements that expire in 2026. Public Scoping Process will help determine scope of post-2026 long-term planning process.
DURATION	2024 – 2026 (3 YEARS)	2026 AND BEYOND

2007 Interim Guidelines

Purpose

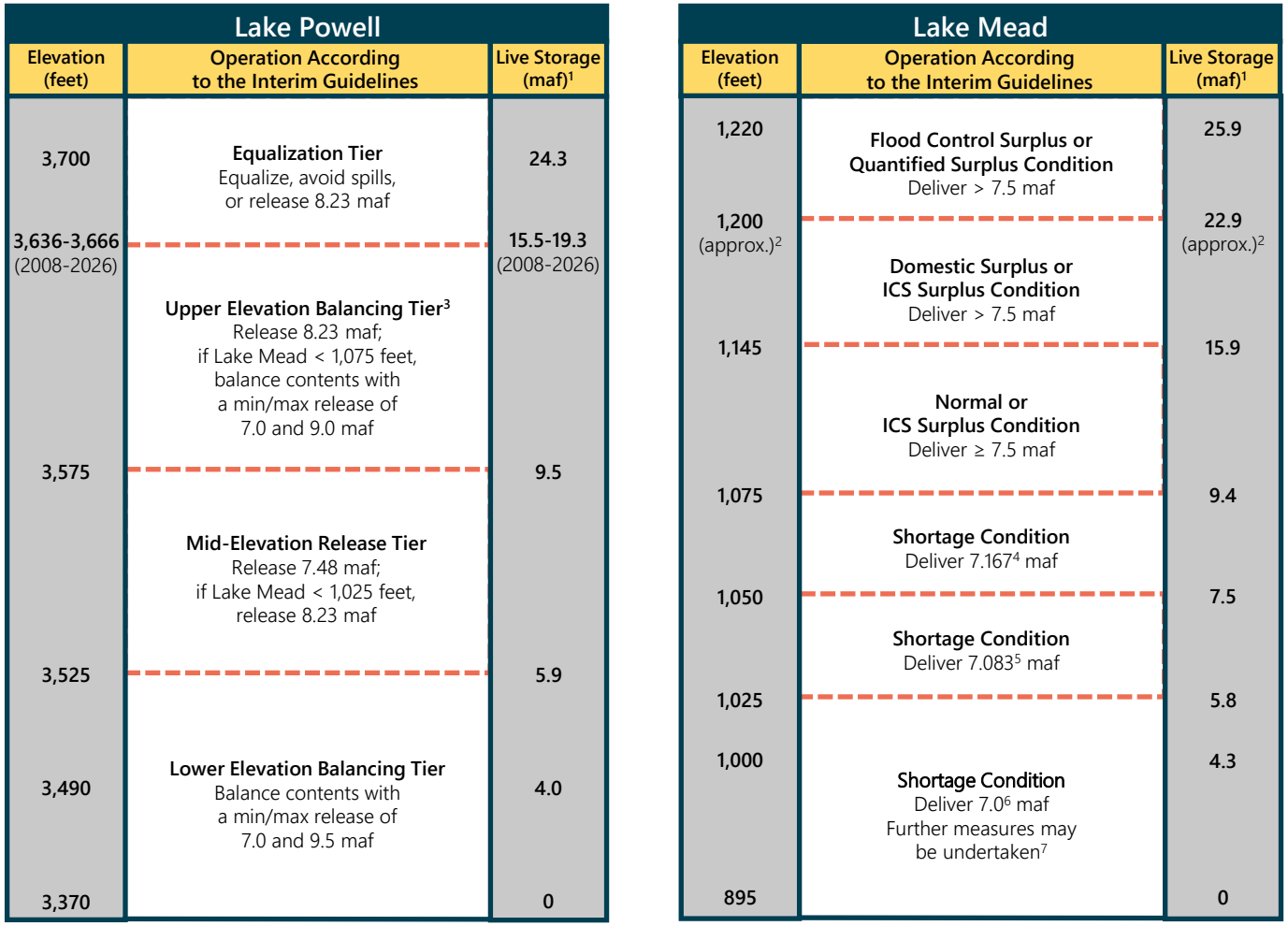
- Improve management of the Colorado River by considering trade-offs between the frequency and magnitude of reductions of water deliveries
- Provide a greater degree of predictability with respect to the amount of annual water deliveries in future years
- Provide additional mechanisms for the storage and delivery of water supplies in Lake Mead to increase the flexibility of meeting water use needs from Lake Mead

Operational Elements

- **Shortage Guidelines** – Prescribed volumes of Lower Basin Shortages at specific Lake Mead elevations
- **Coordinated Reservoir Operations** – Guidelines for coordinated operations between Lake Powell and Lake Mead
- **Storage and Delivery of Conserved Water** – Mechanism for storage and delivery of conserved water in Lake Mead
- **Surplus Guidelines** – Guidelines to identify Surplus Conditions

Summarized from the 2007 Interim Guidelines Record of Decision

2007 Interim Guidelines - Operational Diagram



Lake Powell

Elevation (feet)	Operation According to the Interim Guidelines	Live Storage (maf)[1]
3,700	**Equalization Tier** Equalize, avoid spills, or release 8.23 maf	24.3
3,636-3,666 (2008-2026)		15.5-19.3 (2008-2026)
	Upper Elevation Balancing Tier[3] Release 8.23 maf; if Lake Mead < 1,075 feet, balance contents with a min/max release of 7.0 and 9.0 maf	
3,575		9.5
	Mid-Elevation Release Tier Release 7.48 maf; if Lake Mead < 1,025 feet, release 8.23 maf	
3,525		5.9
3,490	**Lower Elevation Balancing Tier** Balance contents with a min/max release of 7.0 and 9.5 maf	4.0
3,370		0

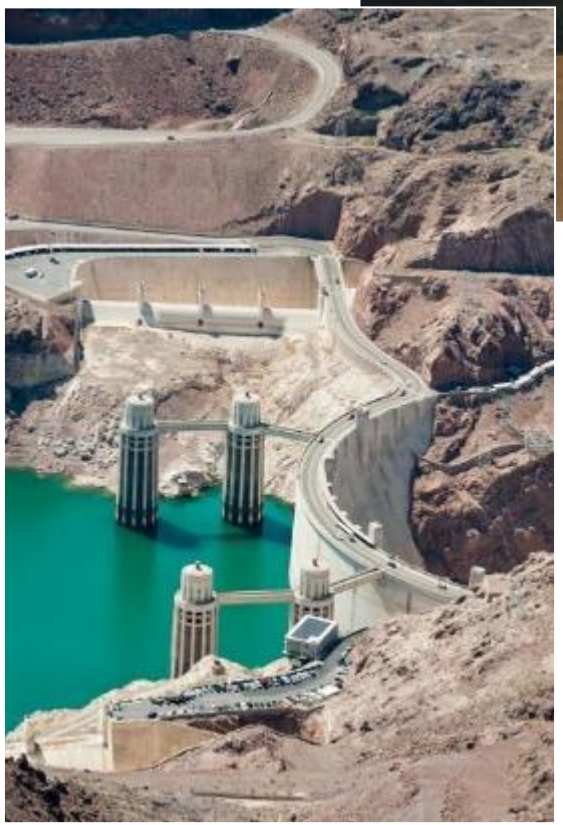
Lake Mead

Elevation (feet)	Operation According to the Interim Guidelines	Live Storage (maf)[1]
1,220	**Flood Control Surplus or Quantified Surplus Condition** Deliver > 7.5 maf	25.9
1,200 (approx.)[2]		22.9 (approx.)[2]
	Domestic Surplus or ICS Surplus Condition Deliver > 7.5 maf	
1,145		15.9
	Normal or ICS Surplus Condition Deliver ≥ 7.5 maf	
1,075		9.4
	Shortage Condition Deliver 7.167[4] maf	
1,050		7.5
	Shortage Condition Deliver 7.083[5] maf	
1,025		5.8
1,000	**Shortage Condition** Deliver 7.0[6] maf Further measures may be undertaken[7]	4.3
895		0

Diagram not to scale; [1] Acronym for million acre-feet; [2] This elevation is shown as approximate as it is determined each year by considering several factors including Lake Powell and Lake Mead storage, projected Upper Basin demands, and an assumed inflow; [3] Subject to April adjustments which may result in a release according to the Equalization Tier; [4] Of which 2.48 maf is apportioned to Arizona, 4.4 maf to California, and 0.287 maf to Nevada; [5] Of which 2.40 maf is apportioned to Arizona, 4.4 maf to California, and 0.283 maf to Nevada; [6] Of which 2.32 maf is apportioned to Arizona, 4.4 maf to California, and 0.280 maf to Nevada; [7] Whenever Lake Mead is below elevation 1,025 feet, the Secretary shall consider whether hydrologic conditions together with anticipated deliveries to the Lower Divison States and Mexico are likely to cause the elevation at Lake Mead to fall below 1,000 feet. Such consideration, in consultation with the Basin States, may result in the undertaking of further measures, consistent with applicable Federal law.

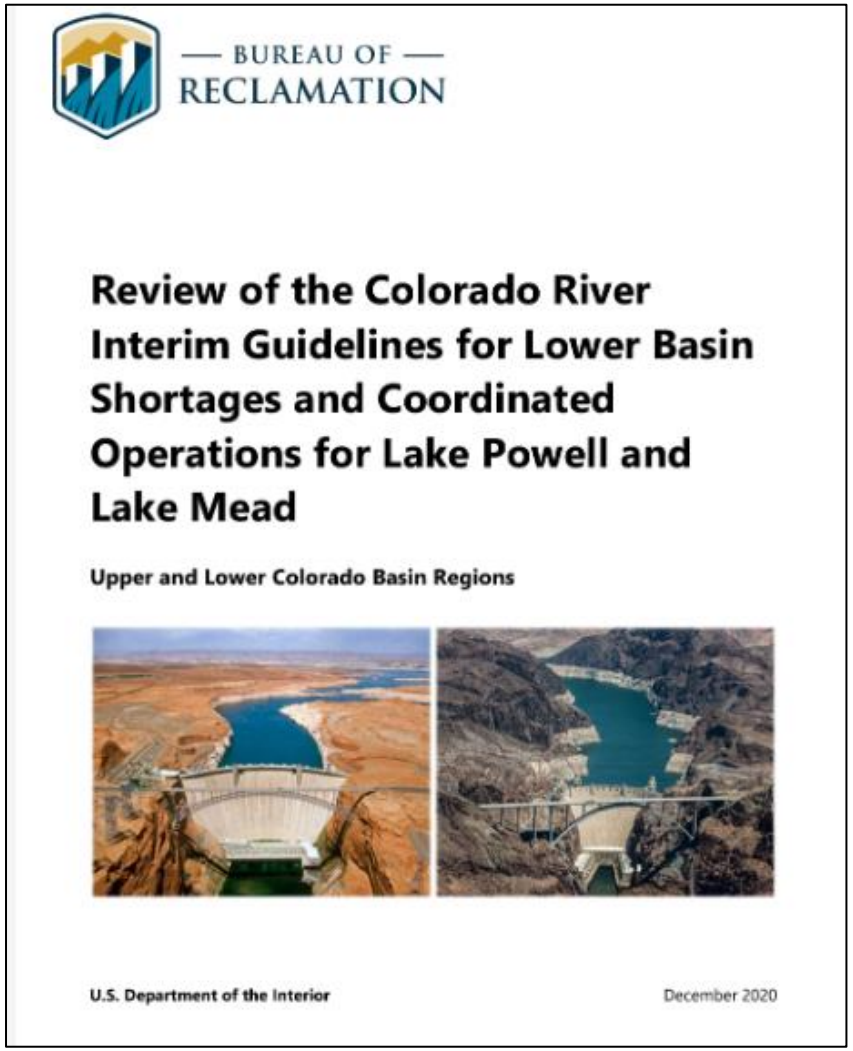
2019 Drought Contingency Plans

- Adopted in response to changing hydrologic conditions and increased risk of reaching critically low elevations at Lake Powell and Lake Mead
- Key Elements:
  - Requires additional water savings contributions by Lower Basin States
  - Allows for additional flexibility for water storage and recovery to incentivize conservation
  - Provides for Drought Response Operations and Demand Management in the Upper Basin
  - Triggers Mexico's Binational Water Scarcity Contingency Plan



2020 Review of the 2007 Interim Guidelines

- Evaluated the effectiveness of the Guidelines and documented operational experience
- Conclusions:
  - Increasing severity of the drought necessitates additional action to reduce the risk of reaching critically low elevations in Lakes Powell and Mead
  - Considerations for enhancing future effectiveness:
    - Enhanced flexibilities and transparency for water users
    - Expanded participation in conservation and Basin-wide programs
    - Increased consideration of the linkage that occurs through coordinated reservoir operations
    - More robust measures to protect reservoir levels

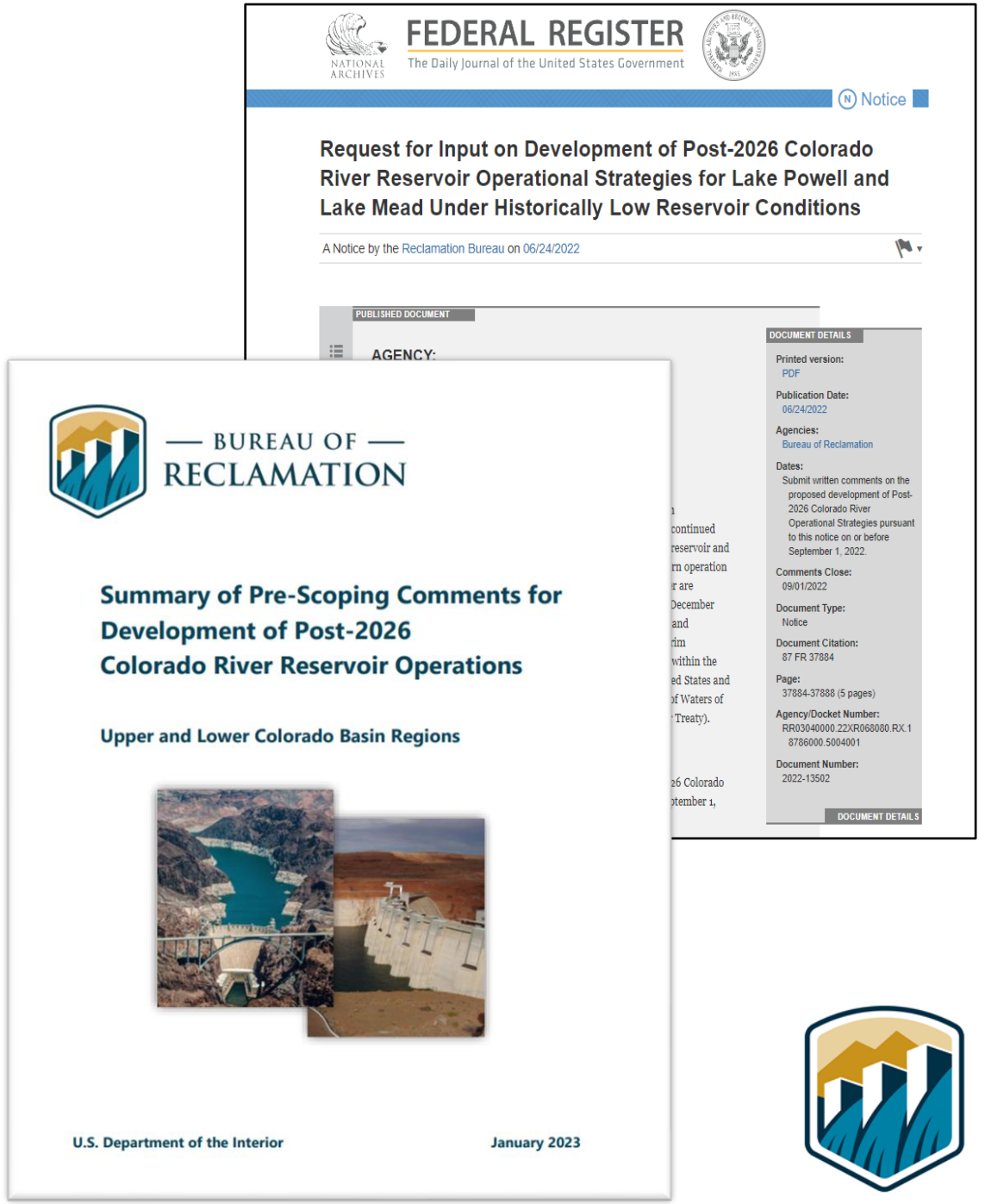


Post-2026 Colorado River Operations

- The “Post-2026 Process” is intended to develop successor domestic agreements for the long-term operations and management of the Colorado River system in 2027 and beyond
- Multi-year NEPA process to be concluded before the development of the 2027 Annual Operating Plan for Colorado River Reservoirs (anticipated to begin in mid-2026)
- Focused on domestic (U.S.) actions. Parallel process through the International Boundary and Water Commission anticipated to develop successor agreements to Minute 323 with Mexico

Post-2026 "Pre-Scoping"

- June 2022 Federal Register Notice (87 FR 37884) published to request input on the process and substantive elements for post-2026 operations
- Highlighted 3 changed circumstances in the Basin since 2007:
  - 1) Changed/changing hydrologic conditions
  - 2) Tribal engagement
  - 3) Cooperative process with Mexico
- Substantial input received from Tribes, States, water districts, NGOs, and the public
- Input summarized in Pre-Scoping Summary Report published in January 2023



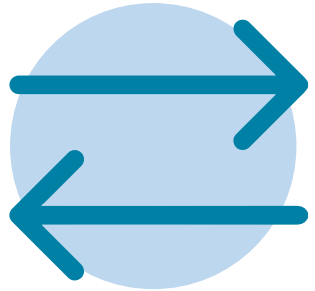
Key Themes in "Pre-Scoping" Comments

Robust and Adaptive

Future operational guidelines must support proactive management to improve system stability. They must be capable of both withstanding a broad range of future hydrologic and operating conditions and minimizing system vulnerability.

Holistic Approach

Future operational guidelines should focus on the long-term sustainability of both the Basin's population and natural environment, minimize system vulnerability, and increase system resiliency.



Alternative Paradigms

The current tier-based approach to coordinated operation of Lake Powell and Lake Mead is one of multiple ways that the system can be managed. Alternative paradigms should be explored.

Partner, Stakeholder, and Public Engagement

- Reclamation is working to design and implement a stakeholder engagement process that is inclusive and transparent; that encourages meaningful input from Tribes, States, partners, stakeholders, and the public.
- Working to implement this commitment through:
  - Prioritizing stakeholder technical education and technical outreach
  - Creating a common technical understanding and developing new tools for engagement
  - Prioritizing outreach, leveraging existing groups, and creating new groups with the goal of enhanced tribal engagement across the Basin

Post-2026: Proposed Schedule

Key NEPA Process milestones – Opportunities for Tribal, State, Partner, Stakeholder, and Public engagement

Scoping Process

- Notice of Intent published on June 16, 2023 initiated the NEPA Scoping Process
- 60-day public scoping comment period ending **August 15, 2023**
- Invite all Basin partners, stakeholders, and interested members of the public to provide oral and written comments
- Scoping Report will be published after the comment period

Scoping Comments

Considerations:

- Past 15 years of operating experience
- Findings from 2020 Review of 2007 Interim Guidelines
- Themes in the Pre-Scoping Report
- Need for robust and adaptive operations

Seeking Feedback On:

- Operational guidelines and strategies
- Potential modifications to the purpose and elements of the 2007 Interim Guidelines
- Any other related issues that should be considered in the EIS

Informs:

- Proposed federal action
- Purpose and Need
- Scope of the analysis (e.g., affected area, geographic scope, time horizon/term)

Ways to Comment

60-day comment period closes August 15, 2023

- During public scoping meetings
- Webform via the project website: www.usbr.gov/ColoradoRiverBasin/Post2026
- Send an email: crbpost2026@usbr.gov
- Telephone hotline: (602) 789-3889
- By mail to:

  Bureau of Reclamation
  Attn: Post-2026 (Mail Stop 84-55000)
  P.O. Box 25007
  Denver, CO 80225

Need Information?

- Project Website: www.usbr.gov/ColoradoRiverBasin/Post2026
- Send questions to: crbpost2026@usbr.gov
- Call the project telephone line: (602) 789-3889

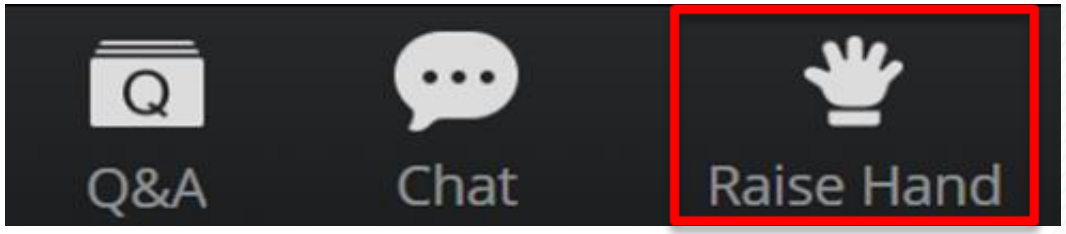

BUREAU OF
RECLAMATION
Public Comment

Comment Guidelines

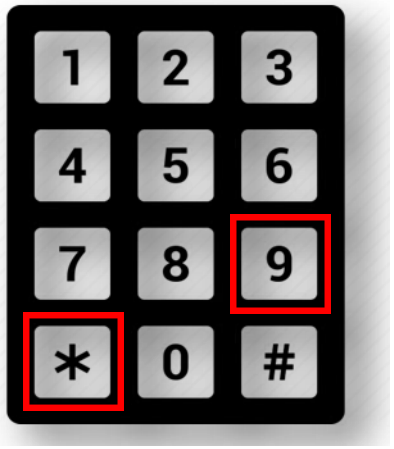
- Comments should be directed to the Bureau of Reclamation, not to other commenters.
- Comments will be limited to 3 minutes so we have time to hear from as many commenters as possible. Comments longer than 3 minutes can be submitted in writing.
- This virtual event is designed to be viewed in homes across the country in real time. Profanity is not acceptable.

To Comment

- Click the raise hand button
- Facilitator will call your name
- Click unmute to speak
- Please state and spell your name when you begin
- Please limit comments to 3 minutes. Please submit comments longer than 3 minutes in writing



Telephone



Comment Timer

To Comment

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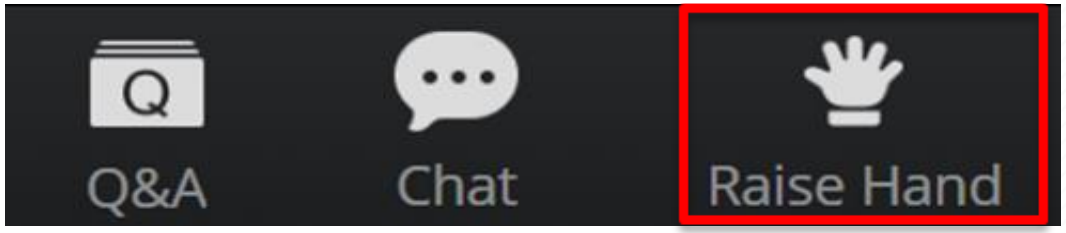

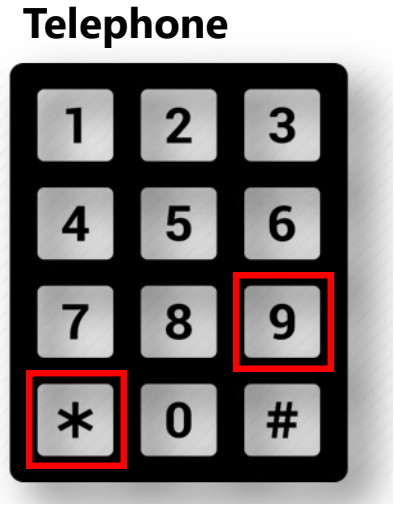

Comment Timer for Comments with Interpretation

Closing Remarks

Ways to Comment

60-day comment period closes August 15, 2023

- During public scoping meetings
- Webform via the project website: www.usbr.gov/ColoradoRiverBasin/Post2026
- Send an email: crbpost2026@usbr.gov
- Telephone hotline: (602) 789-3889
- By mail to:

  Bureau of Reclamation
  Attn: Post-2026 (Mail Stop 84-55000)
  P.O. Box 25007
  Denver, CO 80225

Thank you for your participation!

We are standing by to answer any questions until the meeting ends at 2:00 p.m. MDT

Please click the Q&A button in Zoom to submit a question

APPENDIX D

Form Letters

Form Letter 1

Organization Affiliation: BlueRibbon Coalition

Dear Bureau of Reclamation Post 2026 Guidelines,

I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.

I am aware the "target" elevation is 3,525 feet and the minimum elevation to operate the hydropower, or power pool, is 3,490. Although 3,525 allows you to continue to run hydropower operations, this level restricts numerous recreation opportunities. Because there are so many variables affecting the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir elevations the Bureau needs to consider changing the "target" elevation. Once the lake gets to the target elevation, because of the numerous variables it could be too late to keep the hydrology operations going. In the long run,

The balancing tiers that were introduced in the Interim Guidelines, and I believe these should be incorporated into long-term management for Lake Powell and Lake Mead.

I support the Path to 3588 plan developed by BlueRibbon Coalition that provides a way forward to meet this historic challenge we are currently facing. Even though this plan focuses on painting a viable water level for recreation at Lake Powell, the plan provides an excellent framework for equitably reducing water use among the affected states and Mexico, reimagining the volume and timing of water releases through the major dams, and having enough flexibility built in so that if the reservoirs begin to fill sufficiently, restrictions on water use can ease. The BlueRibbon Coalition Plan also maintains viable lake levels in Lake Mead, and it should be a preferred alternative to any plan that would suggest draining Lake Powell to fill Lake Mead.

As the Bureau of Reclamation creates alternatives, BOR needs to strongly consider the needs of recreational users and balance these needs along with the interests of other water users. Outdoor recreation generates billions of dollars each year, sustaining many local economies. These communities rely on continued recreation access to Lake Powell and Lake Mead for continued economic growth. These communities, which include neighboring Tribal Nations, would suffer significant losses if recreation is lost or decreased due to water elevation levels. NPS estimates that both Lake Mead and Lake Powell produce almost $500 million in direct economic impact to gateway communities, and we estimate that the broader impact is measured in billions. This economic impact positions recreation to provide comparable economic benefit as power generation and agriculture.. By developing a "recreation alternative" BOR will also have a plan that allows for better water level buffers that are needed to prevent reaching the points of lost power generation capacity and/or dead pool.

I hope BOR will include analysis of the economic importance of recreation in addition to feedback on power generation and water deliveries. Because there are so many variables affecting the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir elevations the Bureau needs to consider changing the "target" elevation. In the long run, I think 3588 feet is a better target elevation for Lake Powell and an elevation between 1050 and 1075 is a better elevation for Lake Mead to meet the demand for recreation on the lake in a way that also protects the power generation and water right interests.

Form Letter 2

Organization Affiliation: Nation Audubon Society

Dear U.S. Bureau of Reclamation,

The Colorado River is a national treasure and a major driver of the U.S. economy. Protecting it for future generations is essential.

While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.

The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.

In particular, I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor. In fact, some 70% of all wildlife in the region visit the Colorado River's remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.

As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.

Over the decades, we've lost a massive amount of habitat--we can't afford to lose any more. The stakes are enormous for people, for birds, and for the entirety of our country.

Form Letter 3

Organization Affiliation: Glen Canyon Institute

The Post-2026 EIS is a critical moment for the Colorado River. It's a system that has been drastically over-allocated, with consequences for its citizens and the environment. A sustainable future for the river will require using less water and also rethinking Glen Canyon Dam.

-The EIS should analyze the full bypass of Glen Canyon Dam, using Lake Powell as a backup facility. As climate change continues to reduce flows on the river, the dam becomes more of a liability preventing water from flowing downstream. Fully bypassing the dam to allow natural flows and sediment downriver would give the river, its users, and its ecosystem the most flexibility and adaptability in a drier future.

-The EIS should acknowledge the extensive resources that have emerged in Glen Canyon. In the years since Lake Powell reservoir has declined, natural wonders have reemerged like Cathedral in the Desert, Gregory Natural Bridge, as well lush riparian ecosystems, and priceless archeological sites. The immense value of Glen Canyon's resources needs to be accounted for as decision makers choose where to store water. Storing water in Lake Powell would drown one-of-a kind natural wonders, destroy emerged riparian ecosystems, and damage delicate archeological sites.

-The EIS should analyze a “Fill Mead First” model, prioritizing water storage in Mead before Powell, including a “don’t fill past 3,550” policy at Lake Powell reservoir. For most of the past decade, there hasn’t been enough water in the Colorado’s mainstem reservoirs to fill either Lake Powell or Lake Mead. If there isn’t enough water to fill either one, it doesn’t make sense to needlessly drown the national park-caliber canyons in Glen. Fill Lake Mead first, and give Glen Canyon the opportunity to continue its amazing restoration.

Form Letter 4

Organization Affiliation: Unknown

Don't forget the SALTON SEA in your planning. Import Ocean water to the Salton Sea. Colorado River water cuts without ocean water imports will destroy the Salton Sea.

Form Letter 5

Organization Affiliation: Save the Colorado

Dear Commissioner Touton and U.S. Bureau of Reclamation,

Please accept this letter as public comment on the "Post 2026 Colorado River Public Scoping".

Thank you for starting a full Environmental Impact Statement (EIS) process for the overall management of the Colorado River. In the EIS: 1) the ecological health of the river must be placed at the center of management, 2) BuRec must adopt solutions that are long-term, equitable, sustainable, and actually solve the problems on the Colorado River rather than kick the can down the road, and 3) the river needs to be "fixed" using Nature-Based Solutions that are also "climate action" to mitigate, and allow adaptation to, climate change that will further decrease flows in the future.

Long-term, equitable, sustainable solutions in the EIS should include:

1. Creating a "Grand Canyon Restoration Alternative" that includes bypassing and decommissioning Glen Canyon Dam, and storing all of the Colorado River's water in Mead Reservoir instead of Powell.
2. Stopping all proposed new dams, diversions and pipelines.
3. Enacting conservation programs to save Mead Reservoir.
4. Letting 10% of the river's total water flow into and through its Delta to the Sea of Cortez in Mexico to sequester carbon in Delta wetlands and mangroves and restore the wildlife habitat.
5. Allocating Native American water rights by subtracting that water from current diversions, or, by paying tribes to keep their water in the river.
6. Distributing water allocations to all users based on the percentage of total flow available each year, not a fixed amount.

I will be continuing to send in comments during later phases of the EIS process. Thank you for your work.

Form Letter 6

Organization Affiliation: Food and Water Action

Dear U.S. Bureau of Reclamation,

The Colorado River Basin is a vital source of water for millions of people, but due to poor management and greedy agribusiness corporations, the water supply of over 40 million people is a risk.

Climate change, extreme weather, and mega-droughts further endanger water access. That's why I ask that you prioritize households before big ag when developing plans to converse water in the Colorado River Basin.

Food & Water Watch has issued a new report detailing the abuse factory farms, and agribusiness have to the region's water. It's time to stop this abuse of our water resources.

Please prioritize households, communities, and wildlife over agribusiness greed.

Form Letter 7

Organization Affiliation: Western Resource Advocates

357 people have signed on in support of WRA's five principles for governing the Colorado River.

WRA principles for governing the Colorado River:

1. Reduce water use across the Basin by 25%.
2. Use the best available science and plan for there being less water in the river today and less water in the future due to a warming, drying climate.
3. Protect and improve water flows in the river to protect irreplaceable ecosystems, cultural values, and outdoor recreation opportunities.
4. Include Colorado River Basin Tribes, who have long been denied access to their fair share of water, in decision-making and ensure that they have equitable access to water.
5. Provide impacted people, conservation groups, and other stakeholders the opportunity to meaningfully contribute ideas for sustaining the river.

APPENDIX E

Coded Scoping Comments

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
Form 1	-	ALTBOAT - Alternatives - Boating	I am aware the "target" elevation is 3,525 feet and the minimum elevation to operate the hydropower, or power pool, is 3,490. Although 3,525 allows you to continue to run hydropower operations, this level restricts numerous recreation opportunities. Because there are so many variables affecting the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir elevations the Bureau needs to consider changing the "target" elevation. Once the lake gets to the target elevation, because of the numerous variables it could be too late to keep the hydrology operations going. In the long run, The balancing tiers that were introduced in the Interim Guidelines, and I believe these should be incorporated into long-term management for Lake Powell and Lake Mead. I support the Path to 3588 plan developed by BlueRibbon Coalition that provides a way forward to meet this historic challenge we are currently facing. Even though this plan focuses on painting a viable water level for recreation at Lake Powell, the plan provides an excellent framework for equitably reducing water use among the affected states and Mexico, reimagining the volume and timing of water releases through the major dams, and having enough flexibility built in so that if the reservoirs begin to fill sufficiently, restrictions on water use can ease. The BlueRibbon Coalition Plan also maintains viable lake levels in Lake Mead, and it should be a preferred alternative to any plan that would suggest draining Lake Powell to fill Lake Mead. As the Bureau of Reclamation creates alternatives, BOR needs to strongly consider the needs of recreational users and balance these needs along with the interests of other water users. [...] By developing a "recreation alternative" BOR will also have a plan that allows for better water level buffers that are needed to prevent reaching the points of lost power generation capacity and/or dead pool. [...] Because there are so many variables affecting the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir elevations the Bureau needs to consider changing the "target" elevation. In the long run, I think 3588 feet is a better target elevation for Lake Powell and an elevation between 1050 and 1075 is a better elevation for Lake Mead to meet the demand for recreation on the lake in a way that also protects the power generation and water right interests.	Blue Ribbon Coalition	
38	2	ALTBOAT - Alternatives - Boating	Please help us maintain our recreation area.		Russell Hatch
40	1	ALTBOAT - Alternatives - Boating	PLEASE KEEP WATER IN LAKE POWELL!!!		Linda Hugentobler
46	1	ALTBOAT - Alternatives - Boating	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		Janelle Goligoski
63	1	ALTBOAT - Alternatives - Boating	This lake has been the vacation spot for my family for 30+ years every summer. To see the water levels so low is a sad and makes it difficult to find the awesome houseboat spots we used to for the week and enjoy wake surfing, fishing, water skiing and jet skiing. Weâ€™d love to keep passing this tradition to our children for another 30 years if we can keep the lake full! Please do the right thing and Make Powell Great Again!		William Virgi
66	1	ALTBOAT - Alternatives - Boating	We go to Lake Powell every year as a family and now I will be taking my family there for the next 20+ years. We need to preserve water for the reasons above and also to make sure future families and other travelers can enjoy the beauty of Lake Powell.		Carter Green
70	1	ALTBOAT - Alternatives - Boating	Additionally I would like to mention Iâ€™m only 20 years old and I take a bi-annual trip to lake Powell. Even I have been unable to go to certain spots I had been to in the past. My parents who have been going for 20 years will show me where the water levels were when they first started to go. Powell has too much culture to just let die and go to waste. SAVE THE LAKE!		Andrew Koziatek
74	1	ALTBOAT - Alternatives - Boating	Iâ€™d also like to add that I have been a recreational user of lake powell for 25 years, my wife and I fell for each other on that lake, we got engaged at rainbow bridge, and our 15 month old daughter has already been to lake powell. We would love to keep this place in our lives and create memories with our children and hopefully great grandchildren for many years to come.		William Crane
84	1	ALTBOAT - Alternatives - Boating	I JUST RETURNED FROM LAKE POWELL LAST NIGHT AND I HAVE TO SAY IT IS SO BEAUTIFUL THERE. I have traveled all over the earth and my favorite place to be is Powell. Everyday was awesome. I enjoy taking the house bait down the channels and camping, eating, playing games with my family. I enjoy paddling boarding and floating in the water to cool down. I was awesome to surf and water ski and gaze up at the stars for hours talking with friends and snuggling with my loved ones. Please preserve this land for us.		Natalie Cook
103	1	ALTBOAT - Alternatives - Boating	Lake Powell is a special place for families to enjoy and bond. Iâ€™m a St. George native and would never get to see this wonderful country if it were not for the lake. Letâ€™s build the lake back up for our water security and recreational enjoyment		Joseph Atkin

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
112	1	ALTBOAT - Alternatives - Boating	As a lifetime user of Lake Powell, where the memories created here are generations deep into our family, the one and only family vacation weâ€™ve ever had has been a 7 week trip to Lake Powell for the past 40 years. All my family memories are created on this lake from Bull Frog bay where my parents where once houseboat owners to Antelope Point Marina where a sister of mine has a timeshare on a houseboat. The water level is a crucial part of the continued memories we have on this lake that result in this national monumentâ€™s sustainability. As my ultimate vacation home and what I call paradise, I would LOVE to see the lake rise again where it enables so many more recreation benefits that can unpack old memories such as going through the cut, going to the toilet bowl by Gunsight bay, and the never ending list of gorgeous areas that require certain lake levels to experience that we havenâ€™t been able to in at least 4 years or longer.		Hoss DeRoest
117	1	ALTBOAT - Alternatives - Boating	Please vote to keep the water in Lake Powell.		Casey Rehrer
118	1	ALTBOAT - Alternatives - Boating	I hope that lake Powell will regain its high water levels, thereby allowing a secured recreational area, power generation and needed water even during stout years. I support the plan developed by BlueRibbon Coalition that provides a way forward to meet this historic challenge we are currently facing is good but does not go far enough. I strongly feel that we need significantly more water in case of another drought.		Jed Harr
119	1	ALTBOAT - Alternatives - Boating	To have the lake levels dropped, and recreation stifled because of old legislation is absolute madness!		Jeremy Larkin
123	1	ALTBOAT - Alternatives - Boating	Please keep the levels of lake Powell higher!		Lisa Webster
128	1	ALTBOAT - Alternatives - Boating	Please keep plenty of water in this lake for the generation to come.		Jesika Neemann
131	1	ALTBOAT - Alternatives - Boating	We support the Blue Ribbon Coalition and the Path to 3588.		Jen Swenson
182	1	ALTBOAT - Alternatives - Boating	I understand that the law cannot be changed quickly but as you look to the future and to the new guidelines, I urge you to put in place laws that would preserve the water in lake Powell for many reasons and a myriad of benefits it provides. Please, please, please. Allow our children and grandchildren to enjoy the same beauty and recreation time on that most amazing Lake as we have had.		Matthew Sim
223	1	ALTBOAT - Alternatives - Boating	Lake Powell is very important to me and my family, we have gone every year since my dad was a kid and so many of my favorite memories were made at Powell. If the water is drained to a level that makes going out on houseboats not possible we would be devastated. Powell has a special place in mine and so many others hearts and watching the water levels drop is very sad. So sustaining water levels to the lake would mean everything to so many people.		Lily Sundell
223	2	ALTBOAT - Alternatives - Boating	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		Lily Sundell
298	1	ALTBOAT - Alternatives - Boating	Please consider retaining more water in Lake Powell!		Alexis McAllister
342	1	ALTBOAT - Alternatives - Boating	In addition to the message below, which Iâ€™m sure youâ€™ve seen thousands of times, I want to share my personal view and experience. Beyond the communities that will disappear if Lake Powell ceases to exist, it has also become a legacy for thousands of families in Utah, Arizona, Colorado and far beyond! So many families are now leaving the legacy of recreating on Lake Powell to the 4th generation of lake goers. From the grandparents that were the first to enjoy what the lake offers back in the early days to my young children and the new baby that doesnâ€™t even know where they are as they fall asleep to the sound of the boat engine skimming across the water. This place is more than just a lake, more than just a water supply and more than just a recreation area. Itâ€™s a legacy! One that creates core memories for millions and inspires each of us every time we visit. Failure to fill Lake Powell is a failure to the legacies of millions of families and a failure to America. Please fill this amazing lake and provide the opportunity for the future.		Tim Stobbe
398	1	ALTBOAT - Alternatives - Boating	Please keep lake Powell at recreational levels!!! Donâ€™t just let out water based solely on how much is received.		Chris Riegel
406	1	ALTBOAT - Alternatives - Boating	This is and should still be considered a very very conservative goal and the BOR should strive to achieve and maintain the elevation of 3600+.this 3600 elevation should the the governing limit to determine water released.		Ryan Coello
408	1	ALTBOAT - Alternatives - Boating	Please consider the additional fuel burn when the Castle stock cut is below a navigable level.		Tj Hidinger
453	1	ALTBOAT - Alternatives - Boating	I grew up waterskiing and I want my kids to enjoy the beauty and fun of recreation on Lake Powell. I think that the minimum target elevation for Lake Powell should be at least 3588. The BOR should prioritize recreation as directed by Congress in the creation of the Glen Canyon National Recreation area. I also support the comments and proposal from the Blue Ribbon Coalition.		Stan Moore

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
458	1	ALTBOAT - Alternatives - Boating	Lake Powell has been a Huge part of our lives since little and a huge part of our kids lives. It is not only our favorite place in the entire world, but so many people say the same thing. It is so many peoples â€œhappyâ€ place and we want to keep LAKE POWELL! I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		Jennifer Barnes
472	1	ALTBOAT - Alternatives - Boating	I hope that we can hold more water in lake Powell so that my family and familyâ€™s like ours can continue our traditions of visiting this magnificent place called lake Powell. I urge the bureau of reclamation to consider the recreation impacts of releasing so much water. I hope that you find a way to save our lake because it is practically home to a lot of familyâ€™s including mine!		Tyler Rex
482	1	ALTBOAT - Alternatives - Boating	Please sustain the water levels in the reservoirs through smart management not on a 2005,2006, amendment, it is so important and recognizing the recreation interests is crucial, not only for jobs but spending extra money to adapt to the lower levels was expansive & expensive.		Shawna Tollestrup
502	1	ALTBOAT - Alternatives - Boating	Please help keep our lakes safer with higher water. When the water is low our family can not use the cut that at some point so much money was spent to create it. Please let us use the cut. It is much more dangerous for boaters to go through the Chanel and we need the use of the cut.		Lacee Shakespear
544	1	ALTBOAT - Alternatives - Boating	Release rates need to be based on the overall elevation of the lake and not just on a single years snowpack. Please keep this area a recreation area that everyone can enjoy.		Sean Maloney
556	1	ALTBOAT - Alternatives - Boating	Stopping wasting our precious water at lake Powell. We finally get an amazing snow year, yet we are releasing record amounts of water. Lake Powell is an incredible place that me and my family have enjoyed for the past 30 years. It is my favorite place on the planet. I have some of my fondest memories there, and love making new memories every year. My kids are 8, 6, and 4, and I love creating new memories with them, and seeing the lake through their eyes. The last few years have been very bleak to the say the least with how low the water levels have been. Please, please, please stop wasting so much water. Letâ€™s fill the reservoir and get the lake back up to a healthy water level!!		Jared Hardy
561	1	ALTBOAT - Alternatives - Boating	Please seriously consider the valuable 3588 plan that has been thoughtfully developed by the Blue Ribbon coalition.		Casey Glade
567	1	ALTBOAT - Alternatives - Boating	We live in a desert. Utah is the second driest state in the U.S. It only makes sense to keep Lake Powell at a higher level such as 3588.		Nicholas Blackburn
580	1	ALTBOAT - Alternatives - Boating	I will fight for Lake Powell and continue to disagree with laws made against Lake Powell and I will not stand for the draining of our beautiful lake to fill Lake Mead and for destroying family memories and many many more to come. FILL LAKE POWELL		Bridger Guiles
587	1	ALTBOAT - Alternatives - Boating	STOP RELEASING WATER FROM LAKE POWELL. I GREW UP IN THIS LAKE. HAD A HOUSE BOAT FOR 10 YEARS ON THIS LAKE IN THE 90s. I CAN NO LONGER TAKE MY KIDS TO SEE ALL THE BEAUTIFUL CANYONS I SAW BECAUSE THERE IS NO WATER LEFT. YOU PEOPLE HAVE RUINED THIS LAKE. IT IS DISGUSTING WHAT YOU ARE DOING. WHY ON EARTH WOULD YOU WANT TO EMPTY THIS LAKE. GREEDY MUCH JUST STOP. STOP WASTING ALL OF POWELLS WATER. STOP RUINING FAMILY TRIPS. STOP RUINING PARENTS AND GRANDPARENTS THE RIGHT TO LET THEIR FAMILIES EXPERIENCE WHAT WE DID MANY YEARS AGO. KEEP POWELL FULL. STOP WASTING AND RELEASING WATER NOW		Cynthia Sparks
601	2	ALTBOAT - Alternatives - Boating	But and entire team of people with a broader view of things then my self is the Blue Ribbon Coalition. They've done all the work just listen to them.		Reese Romine
620	1	ALTBOAT - Alternatives - Boating	I have experienced many lakes throughout the country. And thereâ€™s no lake as majestic and breath taking as Lake Powell. Please preserve the water in Lake Powell.		Brooke Delahunty
635	1	ALTBOAT - Alternatives - Boating	We need to reconsider the laws of how much water is released or generations of families making memories on the lake will be lost! Please consider a year to year judgment on what should be done with the water so the lakes will no longer get dangerously low!		April Allen
642	1	ALTBOAT - Alternatives - Boating	I think 3588 feet is a better target elevation for Lake Powell and an elevation between 1050 and 1075 is a better elevation for Lake Mead to meet the demand for recreation on the lake in a way that also protects the power generation and water right interests. Letâ€™s make the next 20 years better than the last.		Tyler Richards
647	1	ALTBOAT - Alternatives - Boating	For Lake Powell take a holistic approach and keep the level where the cut will remain open. This will maintain the value of the Wawheap Marina vs catering to just Antelope.		Kati Borchert
660	2	ALTBOAT - Alternatives - Boating	I support the Path to 3588 as described bellow. Seeing the overwhelming excitement to the opening of the Castle Rock Cut is a perfect example of how significant this one location is.		Jeremy Byrom
677	1	ALTBOAT - Alternatives - Boating	Please bring it back to what it was!!!		Emily Burton

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
680	2	ALTBOAT - Alternatives - Boating	Please revise the rules for the future to allow Lake Powell to survive.		Sunnee Goldhardt
1813	1	ALTBOAT - Alternatives - Boating	Keep Lake Powell!		Tom Thackeray
12785	1	ALTBOAT - Alternatives - Boating	I would love to see the lake stay fuller in the winter and think that less water should be let out, to conserve or water here, on lake powell.		Jenny Wells
12799	1	ALTBOAT - Alternatives - Boating	I would urge you to consider recreation interests as you are developing these plans for 2026. Lake Powell is so much more water!		Kelly Stanworth
16947	1	ALTBOAT - Alternatives - Boating	I support the Path to 3588 plan developed by BlueRibbon Coalition that provides a way forward to meet this historic challenge we are currently facing.		Karen Tyler
17098	1	ALTBOAT - Alternatives - Boating	Just keep lake Powell alive! Tons of people go every year and enjoy it. It is a staple trip for tons of families. It helps provide money for people that use the water. You canâ€™t just drain the lake for your selfish reasons and money. Itâ€™s bigger than you. Keep Powell alive.		Drake Jones
17285	1	ALTBOAT - Alternatives - Boating	I support and think it imperative to fill lake powell to it's highest capacity. We should not aim for anything less than full pool at lake powell.		Marshall Kinnison
17405	1	ALTBOAT - Alternatives - Boating	With that in mind it is in my best interest to support the Path to 3588 plan developed by BlueRibbon Coalition that provides a way forward to meet this historic challenge we are currently facing.		Joshua Haiges
20221	1	ALTBOAT - Alternatives - Boating	I support and encourage the conceptual proposals submitted by many, in a variety of forms, to preserve the recreation value of Lake Powell,		Ken Jensen
20221	5	ALTBOAT - Alternatives - Boating	Furthermore, recreation priorities for Lake Powell would be widely acknowledged to be in favor of Lake Powell.		Ken Jensen
20243	1	ALTBOAT - Alternatives - Boating	I work at Lake Powell as a guide for the Glen Canyon National Recreational Area. I support the lake elevation of 3588. This lake helps me support my family and I in the Page area.		Warren Klain
20333	1	ALTBOAT - Alternatives - Boating	I want more water in lake Powell damn it! Iâ€™m seriousâ€¦		Matt Turner
20365	1	ALTBOAT - Alternatives - Boating	Lake Powell is the most unique reservoir in the entire world. A lot of the boating economy in Utah is based off of Lake Powell. I have many friends and family members who would not own boats if it wasnâ€™t for Lake Powell if it wasnâ€™t there the multi billion dollar watersports economy would suffer. It is of vital importance that we support the Blue Ribbon Coalition Path To 3588 and keep our reservoirs at higher levels. Lake Powell holds a very special place in my heart and in the hearts of millions of others. We need to do the things necessary to keep it healthy for centuries to come		Zach Smoot
20426	1	ALTBOAT - Alternatives - Boating	Please consider recreation as you make decisions of lake powell. I support the Blue Ribbon Coalitionâ€™s goal to promote a goal of 3588 elevation.		Blake Bench
20457	1	ALTBOAT - Alternatives - Boating	I know future winters will provide water for the lake to continue to rise but we will only keep heading towards high water line if water does not exit the damn at high rates. Please please please fill lake Powell.		Gared Schneider
20469	19	ALTBOAT - Alternatives - Boating	Safe whitewater boating threshold The BOR needs to reconsider what it concludes as a "safe whitewater boating threshold" of 5,000 cubic feet per second (cfs) which "would be no change in exposure to unsafe boating conditions caused by changes in water levels." (Draft SEIS, Page 3-230). We would encourage the EIS authors to navigate through Badger, Hance, Grapevine, Horn Creek, Deubendorff, Upset, or several other rapids in Grand Canyon at 5,000 cfs before making that conclusion. We understand releases would mirror the 8.23 model which assigns more water in summer months (the peak commercial months) and we encourage the EIS analysis to be revised so minimum flows of 8,000 cfs would be preserved from April 1- September 22.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20599	2	ALTBOAT - Alternatives - Boating	Please maintain enough water (the levels are well known) in the reservoir to maintain the recreation interests year round.		David Larson
20599	3	ALTBOAT - Alternatives - Boating	I support the Path to 3588 plan developed by BlueRibbon Coalition.		David Larson
20618	1	ALTBOAT - Alternatives - Boating	I hope you are receiving thousands of emails with the similar message to please support a water level of 3588â€™ as proposed by Blue Ribbon Coalition. Iâ€™ve been surprised at the amount of water being released from Lake Powell this year. As we all are aware, weâ€™ve had an exceptionally good water year, and the states downriver of Lake Powell and Lake Mead have as well. Many reservoirs in Norther Utah have barely dropped in elevation due to water conservation efforts and that simply itâ€™s been a wet year and the water has not been needed. I fell that this is a similar case with Lake Powell in that the water is not needed and the guidelines for water release from Lake Powell should be revisited to maintain 3588â€™ for both recreational purposes as well as a storage for future dry years.		Erin Dewsnup

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20621	3	ALTBOAT - Alternatives - Boating	It is our view that present policy be modified to produce a minimal water level for Lake Powell that will accommodate the preservation of the needed infrastructure. Most of this infrastructure will need to be rebuilt and it should be with the intention of being permanent. There is no need for fluctuating water levels to destroy newly completed facilities. We recommend developing a recreation alternative that builds a Lake Powell operational tier that will adjust the Mid-Elevation release tier and Lower-Elevation balancing tier to be triggered when lake elevation drops below 3588. An elevation of 3588 at Lake Powell is the elevation that allows for all major recreation amenities to be maintained and open. Managing operational tiers around this level will also position the agency to have more operational flexibility when dealing with changed circumstances since the adoption of the 2007 Interim Guidelines. The agency recognizes that "Hydrologic uncertainty combined with uncertain future growth and water use compound to mean that it is impossible to assign probabilities to any given future and the basin is experiencing conditions of deep uncertainty." While our approach is focused on recreation, we also believe it provides a meaningful framework for analyzing risk and employing planning methods that account for deep uncertainty. We have attached our Path to 3588' Plan, as part of our formal comment, and we request the agency develop an alternative that includes the analysis and recommendations laid out in the attached plan. Our plan has received an enthusiastic response from the recreation users across the basin. We hope you will see this expression of the interests of the recreation community of users as an important voice that should be balanced with the other important voices in this discussion. We appreciate the Bureau of Reclamation acknowledgement of water levels and resources through the Near-term Colorado River Operations SEIS with the development of Alternative 2 in which BRC supported. BRC was preparing a comment in support of this alternative before BOR pulled the SEIS. Although we support a level of 3588, the SEIS proposed 3575 which is a much better management plan than current operating guidelines with the 2007 Interim Guidelines. Ultimately, 3588 as a goal makes more sense with infrastructure and resources on the lake however, 3575 gets water levels far closer. BRC would like the post 2026 Operating Guidelines to function more like the near term operation proposal than the 2007 Guidelines.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20644	1	ALTBOAT - Alternatives - Boating	I agree with the form letter the blue ribbon coalition drafted.		Chris Peterson
20670	1	ALTBOAT - Alternatives - Boating	Please keep our public lands for the public use. Lake Powell and Glen Canyon NRA are enjoyed by millions of people every year from a variety of backgrounds and physical abilities. If Lake Powell is ever drained, very few people would be able to access and enjoy those beautiful parts or our country. Glen Canyon would turn into a reserve for a small group of elite, desert back country and canyoneering groups because they would be the only ones capable of accessing those remote areas. Our public lands are to be enjoyed by the public. Please keep Lake Powell above the 3588 mark in order to ensure optimal public access and enjoyment.		Greg Daly
20733	3	ALTBOAT - Alternatives - Boating	Its time to recognize and re-allocate water to provide for sustainability in the reservoir. The industry that has been created to support the recreation, the city (page), and Big water, matter.		Jake Schoppe
20751	1	ALTBOAT - Alternatives - Boating	I am writing to express my deep concern about the current water levels in Lake Powell and to emphasize the significance of taking immediate action to ensure its proper replenishment for the numerous societal benefits it provides.		Gunnar Biggerstaff
20751	2	ALTBOAT - Alternatives - Boating	Given these societal benefits, it is imperative that we prioritize the refilling of Lake Powell. The current decline in water levels not only threatens the reservoir's recreational potential but also jeopardizes the emotional and economic well-being of the communities that cherish and rely on it.		Gunnar Biggerstaff
20894	1	ALTBOAT - Alternatives - Boating	he first time he took me to Lake Powell was for a family trip for a week on a house boat... On that trip I fell in love with Lake Powell... These experiences that husband and I have at lake Powell are the same that his parents had and ones that we would love our kids to have. I ask that you take this into consideration when evaluating the guidelines for the coming years with the Colorado river. I don't ask that you keep the lake full but to an elevation that everyone can enjoy the lake safely.		CheyAnne Myers
20996	16	ALTBOAT - Alternatives - Boating	The Department requests that NPS Glen Canyon Dam National Recreational Area at Lake Powell and Lake Mead National Recreation Area, in coordination with the Department and Reclamation, identify, design, and construct improved low-water boating access facilities, which can provide year-round motorboat access for the benefit of the boating and angling public. Specifically, the Department requests motorized boating access be maintained at South Cove and Temple Bar or otherwise mitigate the loss of these access points. Additionally, the Department requests Reclamation consider long-term operational alternatives at Hoover and Glen Canyon Dams that maintain water elevations that allow access for recreational boat users and wildlife managers at both reservoirs.	Arizona Game and Fish Department	Luke Thompson
20996	17	ALTBOAT - Alternatives - Boating	In addition to reservoir-based boating recreation, Lee's Ferry below Glen Canyon Dam is a popular place for motorized riverine trout fishing opportunities, one of the few such places in Arizona. Reductions in flow releases, as well as daily fluctuations in flows, can affect the ability of anglers to access the trout fishery upstream from Lees Ferry by motorboat. The Department recommends Reclamation design flow release scenarios that allow for year-round motorboat access to the entire reach of Lee's Ferry below Glen Canyon Dam.	Arizona Game and Fish Department	Luke Thompson
Form 5	-	ALTECO - Alternatives - Ecosystem	1) the ecological health of the river must be placed at the center of management,	Save the Colorado	

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Form 7	-	ALTECO - Alternatives - Ecosystem	Protect and improve water flows in the river to protect irreplaceable ecosystems, cultural values, and outdoor recreation opportunities.	Western Resource Advocates	
782	1	ALTECO - Alternatives - Ecosystem	Save The Colorado believes the ecological health of the river must be given a center seat at the table because it is the health of the river that sustains almost all human and non-human life in the Southwest U.S. Further, only by happenstance - quirks of the Endangered Species Act or water rights that force water downstream - has the river's ecological health played any role in any past management plans or activities. That must change.	Save the Colorado	Gary Wockner
832	1	ALTECO - Alternatives - Ecosystem	the ecological health of the river must be placed at the center of management,		Gary Wockner
988	1	ALTECO - Alternatives - Ecosystem	I trust the Bureau of Reclamation to prioritize the health of wetland environments to sustain our future and the future for wildlife and birds.		Stacy Stephens
1035	3	ALTECO - Alternatives - Ecosystem	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯		Gregg Neuendorf
1215	1	ALTECO - Alternatives - Ecosystem	A vast number of wildlife species are in danger of becoming extinct by the end of the century. We humans are leaving nothing upon which wild creatures can survive. Humans are not in danger of becoming extinct except that when most or all of our wildlife is gone, we will go, too. Give wildlife the priority when deciding how the water from the Colorado River will be allotted.		Paula Narbutovskih
1320	3	ALTECO - Alternatives - Ecosystem	Wetlands are also vital and should be protected at all costs, too!!		Debra Taylor
1838	1	ALTECO - Alternatives - Ecosystem	Protect the Colorado River and prioritize land and wildlife OVER people. The land and animals were there first, the people ruined it, so they come last.		Allison Ostrer
2227	1	ALTECO - Alternatives - Ecosystem	BOR must make the politically difficult decisions to cut allocations to some human users to sustain the few remaining aquatic ecosystems that are clinging to life by the slender thread of the Colorado River. If this region's animal, plant, and human inhabitants are to survive, we must break users of the lazy, casual, ingrained habit of ignoring local ecological constraints and prevailing upon BOR to satisfy their own frivolous, gratuitous consumption. Instead, Americans and our governments must learn to constrain human appetites for water to what this basin can sustainably supply without parching and eradicating the life that has existed here for millennia before humans began the industrial-scale diversion of this precious, life-giving element.***		Jim Steitz
2355	1	ALTECO - Alternatives - Ecosystem	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯		Susan Westervelt
2768	1	ALTECO - Alternatives - Ecosystem	Iâ€™m counting on you to do the right thing to protect the habitats that are crucial to the health and well being of present and future generations.		Kim Maynard
2813	2	ALTECO - Alternatives - Ecosystem	I strongly urge that more rigorous, realistic, actions be undertaken to reduce consumptive use of Colorado River water so that reservoir levels and flows, and habitat for birds and other wildlife are protected for the long term.		Deborah Carter-Drain
2831	1	ALTECO - Alternatives - Ecosystem	I am respectfully requesting that the Bureau of Reclamation protect the present and future of the habitats, birds, animals and people who rely on the Colorado River.		Anita Gyojin Cherlin
2875	1	ALTECO - Alternatives - Ecosystem	Please do all that you can to include protection and restoration to Colorado River Management. A heathy ecosystem along the river assures better water quality for all, birds, fish, plants, animals, AND humans who rely on the river.		Sylvia Wilcox
2908	1	ALTECO - Alternatives - Ecosystem	I am signing my name to this organization generated letter because I Do NOT want to see important habitat for birds, and other plants and animals abandoned in favor of humans only.		Kathryn Hiestand
2908	3	ALTECO - Alternatives - Ecosystem	Solving low water issues should never be done at the expense of the habitats along the Colorado river that need water to survive.		Kathryn Hiestand
2923	1	ALTECO - Alternatives - Ecosystem	Negative human impact on wildlife and birds is huge and we must include nature in our decisions. We depend on birds and other creatures to keep the balance of nature.		Cynthia Osborn
3049	1	ALTECO - Alternatives - Ecosystem	A large part of what makes Colorado and the west unique is our connection to the outdoors, our commitment to share the environment we love with the birds, animals and flora that make it special. Please keep this in mind when developing management plans for the Colorado River. It is not enough to only prioritize the economic needs of humans, we need to also serve our deep need to protect and connect to nature by protecting crucial natural habitats.		Kathy Lindquist-Kleissler
3087	1	ALTECO - Alternatives - Ecosystem	Today I am writing to urge more robust protections for the colorado river. Both in terms of supporting local economies and people, and the incredible wildlife that rely upon it.		Michael Schramm

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3150	2	ALTECO - Alternatives - Ecosystem	Of course people using this water need to have access to a certain amount BUT IT IS IMERATIVE THAT WE PROTET HABITAT FOR BIRDS AND OTHER WILDLIFE.		John and Linda Peck
3322	1	ALTECO - Alternatives - Ecosystem	We can't lose any more of the vital and essential wildlife habitats and the wildlife that is all part of one ecosystem.		Pippa Pearthree
3324	1	ALTECO - Alternatives - Ecosystem	While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for the critical plants, birds and other wildlife remains protected.â€¯		Joanne Keys
3350	1	ALTECO - Alternatives - Ecosystem	Please ensure that habitat for birds and other wildlife remains protected as plans are made for careful conservation of the river water		Nancy Horvath
3431	1	ALTECO - Alternatives - Ecosystem	Please protect these habitats in your plan		Ellen Halbert
3496	1	ALTECO - Alternatives - Ecosystem	Humans aren't the most important species and we have to protect ALL of the others!!		M. Lou Orr
3517	1	ALTECO - Alternatives - Ecosystem	Please give careful and thorough consideration to all aspects of the situation and use every tool at your disposal to find a way to keep as much water as possible in the Colorado River without destroying or adversely affecting the vital ecosystem on which so much wildlife depends.		Shirley McAlister
3579	1	ALTECO - Alternatives - Ecosystem	We cannot think that humans are the most important species!! We must protect ALL species' access to the Colorado River!		M. Lou Orr
3584	1	ALTECO - Alternatives - Ecosystem	We must take into consideration all of the inhabitants of the region, be they plant, animal or person. Our excesses have brought us to this point and it's time we admit it and correct our behavior		Kathleen A Roediger
3910	1	ALTECO - Alternatives - Ecosystem	I live far from the Colorado River, and may never see it again, but I know it to be a treasure for the species that depend on it to survive. How selfish must we be if we fail to protect them.		Linda Barklow
3926	1	ALTECO - Alternatives - Ecosystem	We rely on the river, perhaps too heavily, which is why long-term solutions should focus on more equitable sharing of this water for us and its wildlife. Keeping the needs of wildlife in mind will help save the river for humans, too.		Nancy Hubbs-Chang
4010	1	ALTECO - Alternatives - Ecosystem	You probably know that the protection of the Colorado River was one of the chief subjects that led to creation of your organization. It was important then and critical now that the River be protected to insure the survival of the life and lands that have depended upon it for eons before your government agency.		William Carrico
4081	1	ALTECO - Alternatives - Ecosystem	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯		Valerie Van Griethuysen
4470	1	ALTECO - Alternatives - Ecosystem	I urge you to place protection of the natural environment and all of the wild creatures and plants that depend upon it at the top of the list of priorities. Please invest in solutions to ensure habitat protection.		Carolyn Boatsman
4600	1	ALTECO - Alternatives - Ecosystem	When protecting the river, we need to consider more than its water. The river is an essential habitat for a diverse flora and fauna. It indirectly supports are critical wildlife refuges. As we consider new plans for the management of the Colorado, we should expand our views on 'beneficial use' that focuses on humans. We are part of a complex web of organisms. Ignoring the need of other organisms may not only deprive future generation of the opportunities to enjoy the amazing diversity of our natural world. It may also lead to unintended consequences due to the impact on keystone species that contribute to things like pollination, control of mosquito populations, removal of organic waste etc.		Klaus Bielefeldt
4613	1	ALTECO - Alternatives - Ecosystem	â€¯A river is about habitat as much as it is about water -- in fact, the two cannot and should not be separated. So is protecting the diverse habitats that provide sustenance for plants, birds, wildlife, and human beings along its route.		Nina Chordas
4699	1	ALTECO - Alternatives - Ecosystem	I think if John Wesley Powell could explore the wild Colorado, a Civil War veteran with only one arm, if he were alive today, he would expect the least you could do would be to protect the Nature that so heavily depends on this river, as well as the citizens who are learning the hard way what Powell announced very early in the history of the American West: parts of it beyond the 100th meridan are very dry - and now getting even drier.		William Neil
5099	1	ALTECO - Alternatives - Ecosystem	It is extremely important to me that the Bureau of Reclamation ensures habitat for birds and other wildlife remains protected.â€¯		Lisa Turrini
5152	1	ALTECO - Alternatives - Ecosystem	We need to take better care of what is left of our environment, for wildlife, marine life, plant life, and people.		priscilla martinez
5156	1	ALTECO - Alternatives - Ecosystem	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.		Francine Lane
5195	1	ALTECO - Alternatives - Ecosystem	Our wildlife is in constant danger due to human negligence, over building in sensitive areas, habitat destruction and human indifference. I urge you to please take these birds into consideration as you plan the future of the Colorado River.		S Dormsjo

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5479	2	ALTECO - Alternatives - Ecosystem	The Bureau of Reclamation must ensure that habitat for birds and other wildlife remains protected and are prioritized over thirsty crops. That water supply should not threaten other essential water needs. Natural requirements should take precident over crops requires lots of water!		Susan Selbin
5512	1	ALTECO - Alternatives - Ecosystem	We have the power and the inginuity to make sure the river supports all the ecosystems it has supported before we decided golf courses (among many other things) belong in the desert.		Larry Kimball
5579	1	ALTECO - Alternatives - Ecosystem	Whatever needs humans have (and whatever desires they insist upon, like golf courses, green lawns in the desert, fountains in Vegas, swimming pools in every yard, etc), habitats and wildlife also have needs and they, unlike humans, cannot reverse human decisions and combat human greed. The time has come to give habitats, wildlife, and our natural and national heritage top priority.		Anne Wallace
5645	1	ALTECO - Alternatives - Ecosystem	Our unprecedented losses of biodiversity demand that we take action to restore balance to our natural world if we hope to maintain life on this planet.		Aleks Kosowicz
5949	1	ALTECO - Alternatives - Ecosystem	I agree we have to do something, but not at the expense of our natural wildlife that depend on the river for survival.		Elaine Todd
6230	1	ALTECO - Alternatives - Ecosystem	Over the past few years, we've lost massive amounts of habitat due to poisoning the water from the use of herbicides and pesticides and the runoff that results. The losses must stop now -- we can't afford to lose any more. The stakes are enormous -- for people, for birds, and for the entirety of our country and our planet -- we must provide plentiful sustenance. Any other choice is unacceptable: loss of habitat will be death for all.		Diane Bolon
6398	1	ALTECO - Alternatives - Ecosystem	Please keep in mind that wildlife depends on the Colorado for survival as well as people. Don't sacrifice our wildlife to the selfish users that waste our water on lawns and swimming pools. This is a crisis situation and we need strong laws that will ensure that water is not wasted in our cities.		Sonia Hurt
6552	1	ALTECO - Alternatives - Ecosystem	It is actually more important to keep eco-systems intact than to water lawns which should not be put in dessert eco-systems anyway.		Kimberly Hornung-Marcy
6762	2	ALTECO - Alternatives - Ecosystem	The federal government must be more careful managing Colorado watershed habitats and make better choices concerning the habitats that do not have a secure water supply.â€¯â€¯		Bruce Hlodnicki
7005	1	ALTECO - Alternatives - Ecosystem	I urge you to protect the Colorado River and everything that relies on it -- the Indigenous people who depend on it as well as the countless birds and other wildlife.		Dorothy Jackson
7134	1	ALTECO - Alternatives - Ecosystem	The Colorado River is not a giant canal carrying water for sale. Its habitats are vital to the health of fragile ecosystems of national and international significance.		Genette Foster
7176	1	ALTECO - Alternatives - Ecosystem	While taking more rigorous actions to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure that habitat for birds and other wildlife remains protected.		Wendy Ebersberger
7176	3	ALTECO - Alternatives - Ecosystem	The federal government must look broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply. In particular, I ask that you consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor.		Wendy Ebersberger
7342	1	ALTECO - Alternatives - Ecosystem	If we are in fact serious about the Biden administration committing to the 30-by-30 goal; we must protect the Colorado River to protect and preserve habits impacted by its waters.		Lori Pivonka
7536	1	ALTECO - Alternatives - Ecosystem	Please donâ€™t forget endangered species and habitat as well as scientific and cultural values when considering your programs.		Thomas Rehfeldt
7582	1	ALTECO - Alternatives - Ecosystem	Forget the golf courses, forget grass. Save the animals.		Judy Ungvary
7763	1	ALTECO - Alternatives - Ecosystem	â€œ Manage, develop and protect water and related resources in an environmentally and economically sound manner in the interest of the American peopleâ€, so reads the mission statement. It is with this in mind that I ask you consider the numerous wildlife, birds,and flora that also depend on this water. They are an equal part of the ecosystem that makes the river so beautiful and important. They play a small but critical part in maintaining the ecosystem and it is equally important that they receive protection and the resources necessary to thrive.		Julie Carll
8102	1	ALTECO - Alternatives - Ecosystem	Please protect the future of all of the habitats, birds, and people who rely on the Colorado River.		Carol Cook
8242	1	ALTECO - Alternatives - Ecosystem	We must protect the Colorado River. Most humans would say for the many people who use (often waste) the water. We say save it for the plants and animals, whole eco systems who depend on this mighty river.		Edward and Beatrice Simpson

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8486	2	ALTECO - Alternatives - Ecosystem	Natural resource exploitation only seemed costless as we dammed and diverted, allowed industries to concentrate in the hands of corporate oligarchs , deferred public decisions to imbalanced financial markets, allowed ungoverned, reckless growth and sought to protect private profits before sustainable public health, efficient economies and community needs.		Thomas Cassidy
9265	1	ALTECO - Alternatives - Ecosystem	Decision Makers, please protect the future of the Colorado River.		Walter Hylton
9330	1	ALTECO - Alternatives - Ecosystem	Please prioritize water supply for WILDLIFE HABITATS along the Colorado River, thereby by helping to ensure necessary actions/policies for responsible human population management and reduced human impact.		Debbie McKevitt
9520	1	ALTECO - Alternatives - Ecosystem	Prioritizing agriculture and development over wildlife conservation has consequences. Please correct this imbalance.		Wendy King
9759	1	ALTECO - Alternatives - Ecosystem	Please protect the full environment and various habitats of the Colorado River.		Raymond Smith
9865	3	ALTECO - Alternatives - Ecosystem	However, habitats for birds and other wildlife that do not have secure water supplies must also be protected.â€¯ Please find solutions that will not only benefit humans but also birds and wildlife. Please especially consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor. In fact, some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.â€¯ Given how climate change will continue to contribute to the destabilization of the Colorado River system, I urge the Bureau to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯ We've already lost massive amounts of habitat, and we can't afford to lose more. The Colorado River is an essential resource, not just for humans but for birds and wildlife too, and they must also be considered as you plan for the future. Everyone benefits from a stable ecosystem that must include birds and wildlife.		Jane Haspel
10331	1	ALTECO - Alternatives - Ecosystem	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ We have let an old method of water distribution outlive its usefulness and it needs to be replaced with s system that includes the welfare of the ecologies and wildlife that depend on the river.		Scott Milam
10438	1	ALTECO - Alternatives - Ecosystem	We need wildlife and ecosystems in as well as for human consumption and agriculture.		Fay Payton
11148	3	ALTECO - Alternatives - Ecosystem	As climate change makes water more and more valuable to people and the economy, it also becomes imperative that wildlife and ecosystems are considered. People can learn to conserve water; agriculture can learn to plant drought-tolerant crops....but wildlife is dependent on the riparian areas and wetlands and refuges that the Colorado River provides. Please consider wildlife and wetland ecosystems in your deliberation and make these areas safe for future generations.		Linda Craig
11431	1	ALTECO - Alternatives - Ecosystem	We need to better protect our ecosystems!		Deb deForest
11809	4	ALTECO - Alternatives - Ecosystem	With climate change impacting the river, we must plan for changes in environmental resources. Letâ€™s invest in solutions, using available federal funding, to support the birds and other wildlife that depend on these habitats.		Ken Kurtz
12303	1	ALTECO - Alternatives - Ecosystem	YOUR AGENCY MUST VIGOROUSLY PROTECT OUR ECOSYSTEMS!!!!! I STRONGLY URGE YOU TO VIGOROUSLY PROTECT the Colorado River now!!!!!		Glen Anderson
12395	1	ALTECO - Alternatives - Ecosystem	HUMANS HAVE LITERALLY SUCKED THE RIVERS DRY - HUMANS HAVE KILLED VIRTUALLY EVERYTHING..... IT IS WAY PAST TIME FOR THE HUMANS TO SUFFER AND DO WITHOUT - THAT HUMANS GIVE MOTHER NATURE AND THE ONCE MIGHTY COLORADO RIVER DECADES TO REBUILD AND BECOME BOUNTIFUL AGAIN. HUMANS NEED TO DO WITHOUT. PERIOD. MOTHER NATURE HAS BEEN MURDERED AND WE'LL GO WITH HER UNLESS WE PRIORITIZE SAVING HER FIRST AND FOREMOST !!!!!!!		Alexandra Mitchell
14516	3	ALTECO - Alternatives - Ecosystem	but urge the Bureau of Reclamation to also protect the habitats of birds and other wildlife.â€¯ The federal government needs to look more broadly and carefully at the impacts of proposed policies to ensure the habitats of birds that lack secure water supply.â€¯â€¯ With this is mind, please take into consideration bird habitats in the Grand Canyon, Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta. These areas all need sustained water to protect iconic bird species such as the Bald Eagle, Yellow Warbler, and California Condor. 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests at some point, including 400 bird species along the Lower Colorado River.â€¯		Cressida Wasserman

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14729	2	ALTECO - Alternatives - Ecosystem	In particular, please consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta, all of which need sustained water in order to protect some of America's most unique bird species like the Bald Eagle, Yellow Warbler, and California Condor. Indeed, evidence shows that some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species just along the Lower Colorado River.â€¯		Wallace Elton
14987	1	ALTECO - Alternatives - Ecosystem	The Colorado River needs to be protected for use by humans and wildlife.		Nadine Ancel
15215	1	ALTECO - Alternatives - Ecosystem	Habitat for wildlife and wild ecosystems along the Colorado River must be protected. The Bureau of Reclamation should make this a priority in any management plans for the Colorado River.		Adelia Harrison
16143	1	ALTECO - Alternatives - Ecosystem	The Colorado River is not only a critical source of water for people and their livelihoods in Western states, but also a provider of essential habitat for birds and other wildlife. Hundreds of species of resident and migratory birds depend on this habitat. While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯ Future management proposals need to include the creation or preservation of secure areas of permanent water to maintain these habitats. Bird habitats in the Grand Canyon, the Lower Colorado River, the Salton Sea, and wetlands in the Colorado River Delta all need sustained water in order to protect birds and other wildlife. Research has shown that some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles.		Sue Ordway
16552	1	ALTECO - Alternatives - Ecosystem	As a wildlife ecologist who saw the new restrictions include a fantasy number impossible to sustain, I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor. In fact, some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado. These creatures were here first, in non fantasy numbers, and deserve priority over human self service that pretends the Colorado has more water than it does.		Susanna Miller
16609	2	ALTECO - Alternatives - Ecosystem	and let the birds and other wildlife rule.		Evon Russell
16727	13	ALTECO - Alternatives - Ecosystem	The post-2026 guidelines should not lose sight of the river for the dams.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
17102	2	ALTECO - Alternatives - Ecosystem	We also urge BOR to develop an environmentally preferable alternative on river operations and flows which protects and restores natural river-dependent ecosystems and habitats.	Lahontan Audubon Society	Rose Strickland
17169	1	ALTECO - Alternatives - Ecosystem	Please realise the importance of putting wildlife at the apex of your consideration. Especially above recreation. People and their toys can wait for rainier days and days.		Rebecca Rhien
17241	41	ALTECO - Alternatives - Ecosystem	Habitats and species that depend on the Colorado River are jeopardized, as evidenced by the numerous endangered species designations in the basin, and climate change is further threatening their viability. Reclamation should create and evaluate at least one option for post-2026 management based on improving outcomes for freshwater-dependent habitats and species.	National Audubon Society	Jennifer Pitt
17780	1	ALTECO - Alternatives - Ecosystem	I urge the Bureau of Reclamation to ensure that habitat for birds and other wildlife remains protected. The federal government must look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯ In particular, I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species such as the Bald Eagle, Yellow Warbler, and California Condor. In fact, 70 percent of wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species. As climate change destabilizes the Colorado River system, I urge the Bureau of Reclamation to identify how important environmental resources will change, and invest in solutions--including federal funding--to ensure these habitats continue to support the birds and other wildlife dependent upon them. Over the decades, we've lost a massive amount of habitat; we can't afford to lose more. The stakes are enormous for people, birds, and the entirety of our country.		Lori Rumpf
18850	1	ALTECO - Alternatives - Ecosystem	Will you include in your plans America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor and some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River?		Louise Gray
19830	2	ALTECO - Alternatives - Ecosystem	I am I favor of the Grand Canyon Restoration Alternative as proposed by many conservation organizations.		Cristina Harmon

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20469	7	ALTECO - Alternatives - Ecosystem	6. Given the challenges of creating a sustainable future the entire Colorado River Basin and with careful consideration of the benefits and tradeoffs of managing the two largest reservoirs in the United States, Lakes Powell and Mead, how can this EIS best protect the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were created?	Grand Canyon River Guides, Inc.	Lynn Hamilton
20469	22	ALTECO - Alternatives - Ecosystem	Grand Canyon protection The mandate of the Grand Canyon Protection Act, as well as the goals and objectives of the Long Term Experimental and Management Plan (LTEMP), are the litmus test against which all draft alternatives of the Post-2026 Operational Guidelines EIS must be modeled, measured, and analyzed. In fact, the magnitude of this responsibility to protect and preserve the crown jewel of our national park system and the values that it encompasses is so great, we urge the Bureau of Reclamation to consider developing a "Protect Grand Canyon" alternative as part of the suite of alternatives for this EIS which includes (but is not limited to) the elements discussed earlier in this comment letter: ensuring High Flow Experiments, safe and navigable flows, a healthy ecosystem including protecting the sediment resource and our native fish, and preserving precious cultural resources in this sacred landscape.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20489	3	ALTECO - Alternatives - Ecosystem	3. The post-2026 Guidelines must consider and protect environmental priorities. Stresses and uncertainties in the Colorado River water supply and Basin resources are inevitable amid the 20+ year drought that has been accelerated by climate change. Such reality, however, is no excuse for exacerbating the impacts of drought and climate change when determining appropriate actions to stabilize the system. The environment is not a luxury to be sacrificed in the name of expediency. It is an essential component to the overall health and safety of the Basin and a responsibility for us all to protect.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	25	ALTECO - Alternatives - Ecosystem	iv. Analyzing a full range of alternatives: Including a full range of alternatives, including one that prioritizes flows for the environment to contrast operations and strategies within the range of possible future conditions.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20608	4	ALTECO - Alternatives - Ecosystem	3. Construct alternatives which conserve or enhance the natural, cultural, and scientific values for which the designations leading up to and including establishment of Grand Canyon National Park in 1919 (prior to the Colorado River Compact of 1922), followed by Park expansion and the creation of the Glen Canyon and Lake Mead National Recreation Areas, provided protection.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens

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20700	1	ALTECO - Alternatives - Ecosystem	These new guidelines will directly impact the water flowing between Lake Powell and Lake Mead through the Grand Canyon. The Colorado River is integral to the cultural landscape of the Grand Canyon and the ancestral and current homelands of at least a dozen tribes. The Grand Canyon is not just recognized locally, regionally, and nationally, but was designated by the United Nations Educational, Scientific, and Cultural Organization (UNESCO) as a World Heritage Site in 19792. The Grand Canyon is described by UNESCO as among the earth's greatest on-going geological spectacles. Its vastness is stunning, and the evidence it reveals about the earth's history is invaluable. The 1.5-kilometer (0.9 mile) deep gorge ranges in width from 500 m to 30 km (0.3 mile to 18.6 miles). It twists and turns 445 km (276.5 miles) and was formed during 6 million years of geological activity and erosion by the Colorado River on the upraised earth's crust. The buttes, spires, mesas and temples in the canyon are in fact mountains looked down upon from the rims. Horizontal strata exposed in the canyon retrace geological history over 2 billion years and represent the four major geologic eras. "To be included on the World Heritage List, sites must be of outstanding universal value and meet at least one out of ten selection criteria."3 The Grand Canyon meets four of the criteria including: Criterion (vii): Widely known for its exceptional natural beauty and considered one of the world's most visually powerful landscapes, the Grand Canyon is celebrated for its plunging depths; temple-like buttes; and vast, multihued, labyrinthine topography. Scenic wonders within park boundaries include high plateaus, plains, deserts, forests, cinder cones, lava flows, streams, waterfalls, and one of America's great whitewater rivers. Criterion (viii): Within park boundaries, the geologic record spans all four eras of the earth's evolutionary history, from the Precambrian to the Cenozoic. The Precambrian and Paleozoic portions of this record are particularly well exposed in canyon walls and include a rich fossil assemblage. Numerous caves shelter fossils and animal remains that extend the paleontological record into the Pleistocene. Criterion (ix): Grand Canyon is an exceptional example of biological environments at different elevations that evolved as the river cut deeper portraying five of North America's seven life zones within canyon walls. Flora and fauna species overlap in many of the zones and are found throughout the canyon. Criterion (x): The park's diverse topography has resulted in equally diverse ecosystems. The five life zones within the canyon are represented in a remarkably small geographic area. Grand Canyon National Park is an ecological refuge, with relatively undisturbed remnants of dwindling ecosystems (such as boreal forest and desert riparian communities), and numerous endemic, rare or endangered plant and animal species. It should go without saying that water flowing into and through the Grand Canyon in the Colorado River is integral to the health of the landscape and the Native peoples that have deep spiritual and cultural connections to the land and water in and around the canyon. These important cultural and environmental resources need to be front and center in the development of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20700	16	ALTECO - Alternatives - Ecosystem	3. Specific environmental goals need to be established and incorporated into the post-2026 guidelines. One of the primary omissions from the 1922 Colorado River Compact is the fact that the health of the river itself was not mentioned, allocations were not made or reserved for the 30 tribal nations in the basin, nor to protect and preserve the environment.	Grand Canyon Trust	Jen Pelz
20873	1	ALTECO - Alternatives - Ecosystem	I have seen the changing landscape conditions driven by climate change affect the ecology of the entire Southwestern United States, rendering some areas completely unrecognizable and strengthening my roots in the environmental health of this area. It has become absolutely imperative to me that I see this landscape guided towards rehabilitation and development of a robust ecology. Now, the decisions we make as a country and as an individual, regarding our water resources in times of drought, have serious implications on everyone, including mouths unseen and unheard		Kael Van Buskirk
20899	14	ALTECO - Alternatives - Ecosystem	Worst Case Scenario Alternative: Protecting the Ecosystem As Flows Decline Reclamation must analyze and plan for worst-case scenarios for Colorado River flow declines given ongoing and anticipated future climate warming, regional aridification and consider ways to ensure the protection of the Colorado River ecosystem and not just dam operations. In providing robust and adaptive considerations, besides producing an operational strategy to avoid shortages and/or avoid a run of the river condition throughout the system of reservoirs, as Reclamation has proposed, the agency must set forth triggers and corresponding emergency plans to avoid a collapse of the ecosystem.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20899	39	ALTECO - Alternatives - Ecosystem	WATER SHORTAGES WERE PREDICTED Reclamation has historically ignored well founded predictions that the basin would have far less water in the future. There are lessons to be learned from those mistakes. We offer this look-back at some key studies to encourage Reclamation to look with fresh eyes at the current state of the basin in this DEIS. This is in stark contrast to the outdated assumptions long relied upon by Reclamation regarding water availability and management. The Colorado River is a living ecosystem that must be maintained and restored -- not a series of pipes and tubes. Wallace Earle Stegner supported holistic water resource planning efforts since the writing of his Master's thesis about Clarence E. Dutton, and his biography about the career of John W. Powell. Along with Grove K. Gilbert and Almon H. Thompson, these four scientists from the 19th century understood the limitations of geography and climate in the arid lands of the western USA, and thoughtfully prepared a document for the consideration of Congress in 1878, and called Report on the Lands of The Arid Region of the United States. These concepts were largely rejected by Congress and, as many historians concluded, are among the first national missteps in the management of water resources on a continental scale. To this day, this nation does not have an equitable national water policy, nor do we incorporate sustainability and resiliency into a regional EIS in the Colorado River Basin. The EIS writing team for this analysis needs assistance from skilled academics and from the traditional knowledge that the tribes have possessed since time immemorial.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20916	4	ALTECO - Alternatives - Ecosystem	The EIS should acknowledge, study, prioritize, and protect the returning ecological resources emerging in the canyon country of Glen Canyon and its tributaries. These places are immeasurably valuable culturally, and ecologically.		Travis Custer
20939	1	ALTECO - Alternatives - Ecosystem	As someone who lives within the Colorado River Basin, I have observed what the drought has done to the area. There has been significantly less moisture in the basin and some extremely dry summers. On top of the extreme heat from this summer the sustainability of lake Powell has become a concern of mine. The Glen Canyon Dam, has become more of an issue than a solution to human infrastructure in the desert southwest from my point of view. The Dam now with lower water flows only hurts the annual flow down stream and millions of gallons of water evaporates every year in lake Powell. I have explored the upper escalante Canyon and have learned of the valuable resource of the Desert Riparian Canyons. I donÂ't believe thereÂ's a need for a dam for water storage and you can easily observe the forested canyons help hold water and keep temperatures low better than a giant man made pool.		Daniel Atkins
20950	2	ALTECO - Alternatives - Ecosystem	3. The environment is important: Post 2026 guidelines should consider and value a broad range of environmental benefits and impacts with a goal of supporting ecosystems that contribute to water resilience in the Basin, including sensitive species and habitats in the Grand Canyon and Colorado River Delta.	Gadsden Company, Sonoran Wines, Cruz Farm, Greater Area Kingman Chamber of Commerce, Bullhead City Chamber of Commerce; Greater Flagstaff Area Chamber of Commerce	Harold Thomas
20965	10	ALTECO - Alternatives - Ecosystem	In order to prevent a worsening public health crisis, protect the underserved shoreline communities and revitalize the ecological values of the Salton Sea, the operating guidelines must incorporate an environmental water budget and benefits going forward. This environmental water budget should pay a reasonable amount for each acre foot of water cut from the Salton Sea region into a fund to secure alternative water sources to offset the impacts of Colorado River water supply cuts. The Clean Water Act and Public Trust Doctrine are applicable to the Salton Sea. The Salton Sea is a public resource sustaining an ecosystem that is a major component of the Pacific Flyway, has supported recreational uses over decades and moderates temperature extremes that affect farming by reducing impacts of frost and extreme heat. Restoration and enhancement of wetlands at the Salton Sea reduces open playa, eliminating airborne dust. This provides a dual benefit to humans and wildlife. Protecting natural resources should be considered as an effective solution to address the intensifying repercussions on the Salton Sea. The Ca. Fish and Game Code SS 2940 calls for more than mitigation. It calls for true restoration of the Salton Sea ecosystem. 'In restoring the Salton Sea, it is the intent of the Legislature to DO all of the following: (1) Protect and provide long-term conservation of fish and wildlife that are dependent on the Salton Sea ecosystem. (2) Restore the long-term stable aquatic and shoreline habitat for fish and wildlife that depend on the Salton Sea. (3) Protect water quality. (4) Maintain the Salton Sea as a vital link along the Pacific Flyway. In addition, the Stipulated Water Order 2017-0134 calls for 14,900 acres of habitat and 14,900 acres of dust mitigation at the Salton Sea by 2028. The State of California, through its Salton Sea Management Program (SSMP), is attempting to mitigate the environmental disaster at the Salton Sea by implementing the 10 Year Plan. However, the State is a great deal behind schedule in their dust abatement efforts. Furthermore, the effects of low runoff from Imperial Valley farm drains will exacerbate the public health threat and ecological collapse.	The EcoMedia Compass	Andrew McDonagh

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20965	15	ALTECO - Alternatives - Ecosystem	[Solutions with regard to restoring Salton Sea ecosystem] Local Aquatic Restoration Projects In order to further protect the avian and aquatic wildlife, the Pacific Flyway and the beneficial uses of the Salton Sea, we also recommend other nature-based solutions, such as utilizing the shoreline lagoons that already exist at the State Recreation Area and North Shore Yacht Club. The ponds have a sustainable year-round inflow and outflow of fresh or brackish water. By revitalizing the ponds, it amplifies their habitat value by creating a more usable and improved aquatic resource for fish and fish-eating birds. The total acreage may be small but the impact on saving wildlife, boosting tourism, drought resiliency, equitable outdoor access, recreation and economic benefits would be significant. We also recommend importing water from the ocean to provide the most effective long term dust mitigation measure, and provide options for habitat and human uses. The Salton Sea, its communities, wildlife and ecosystem have been overlooked, neglected and abandoned in its time of need for too long. The crisis on the Colorado River is an opportunity for Federal, State and Local governments to address their responsibility to care for the environment. When the environment is healthy, our communities can thrive.	The EcoMedia Compass	Andrew McDonagh
20996	4	ALTECO - Alternatives - Ecosystem	High risk non-native fish invasions can also occur from downstream in Lake Mead. The decline of Lake Mead water levels has led to the development of Pearce Ferry Rapid, an important barrier prohibiting non-native fishes (such as Channel Catfish, Common Carp, and Striped Bass) from moving upstream into the Grand Canyon. If operational guidelines lead to Lake Mead water levels which inundate or otherwise alter the passage potential of Pearce Ferry Rapid, high risk nonnative fish are likely to expand into the Grand Canyon and negatively impact native fishes. While increases in water elevations in Lake Mead and Lake Powell alleviate many concerns related to water resources, hydropower, and recreation, maintaining elevations below those which would inundate Pearce Ferry Rapid may be an effective management strategy for native fish conservation in the Grand Canyon.	Arizona Game and Fish Department	Luke Thompson
20996	13	ALTECO - Alternatives - Ecosystem	The Department acknowledges that there are necessary tradeoffs and competing values of water levels and releases between the two subject reservoirs. Infrastructure changes that would facilitate better control of water quality represent initial installation costs that, over time, would likely be significantly less expensive than non-native control costs to protect the threatened Humpback Chub population. Realistically, non-native control methods would not be effective without being combined with water temperature reduction as well, and thus funds spent on preventative measures now would reduce costs later. Due to the ability to control high risk non-native fish, solutions for maintaining cold water releases (<16degC) are mutually beneficial to multiple downstream resources listed in LTEMP, including the Rainbow Trout fishery and native fish such as the listed Humpback Chub. The Department recommends Reclamation identify and design infrastructure options and implement water release actions that maintain release temperatures below 16degC (<60.8degF) and dissolved oxygen above 5 ppm, while minimizing impacts to power production and water storage.	Arizona Game and Fish Department	Luke Thompson
21001	3	ALTECO - Alternatives - Ecosystem	Post 2026 guidelines should consider and value a broad range of environmental benefits and impacts with a goal of supporting ecosystems that contribute to water and ecological resilience in the Basin, including sensitive species and habitats in the Grand Canyon and Colorado River Delta.	Bonneville Environmental Foundation	Todd Reeve
21081	7	ALTECO - Alternatives - Ecosystem	The health of rivers and streams making up the Colorado and Green River is extremely important, and BoR should consider tributary health more explicitly in the post 2026 operational guidelines. This includes considering the health of aquatic species, riparian habitats, as well and flow management focused on natural flow regime hydrographs.	Dolores River Boating Advocates	Rica Fulton
21081	17	ALTECO - Alternatives - Ecosystem	Ensure a natural flow regime is maintained throughout tributaries & increase money for restoration	Dolores River Boating Advocates	Rica Fulton
21081	19	ALTECO - Alternatives - Ecosystem	Bookmark funding for leasing water for ecological purposes.	Dolores River Boating Advocates	Rica Fulton
21161	2	ALTECO - Alternatives - Ecosystem	As an ecologist, one of my biggest interest is in protecting the river so that it can reach the ocean again. The Colorado River used to support a beautifully intricate wetland system in Mexico, which not only keeps the area cooler, but supports ecological habitat and diversity. We must consider the ecological impacts of drying up the Colorado River before it reaches Mexico, and focus on restoration projects.		Stephanie Vaughn
Form 5	-	ALTGEN - Alternatives - General	2. Stopping all proposed new dams, diversions and pipelines.	Save the Colorado	
15812	2	ALTGEN - Alternatives - General	Prioritize drinking water first, the needs of wildlife second, and agriculture and manufacturing last.		Fred Perkins
16285	1	ALTGEN - Alternatives - General	Protection of this river must reflect the needs of all.		Cathy Popp
16367	1	ALTGEN - Alternatives - General	Please try to achieve the most healthy balance.		Ralph Palmer
16609	1	ALTGEN - Alternatives - General	You need to undam the CO and let it flow as Nature intended		Evon Russell

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16904	6	ALTGEN - Alternatives - General	A list of alternative electrical power resources to mitigate the loss of hydro power should Lake Powell's elevation drop to a level such that it precludes hydro power generation as well as the elimination of daily peaking flows. One alternative is to collaborate with the Navajo Nation to expand their Kayenta Solar Project in Navajo County. The Navajo Nation has the available land and plenty of sun. The electrical energy generated would offset the reduction of power lost by eliminating daily peaking flows. This potential should be explored with the primary stakeholders such as WAPA, USBR, Salt River Project and the Navajo Tribal Utility Authority (NTUA) as part of post 2026 operations. This alternative should be compared to the February 2023 conceptual proposal for low- head-hydropower modifications of Glen Canyon Dam. A comparison should focus on cost and time for construction.	Grand Canyon Private Boaters' Association	john vrymoed
16940	5	ALTGEN - Alternatives - General	USBR must stop all proposed new dams and diversions across the entire basin because they will divert more water out of the river, exacerbate ecological harm, and escalate political and management chaos.		Jed Koller
16973	1	ALTGEN - Alternatives - General	We are interconnected though. We need these other species for our survival and we must start with creative approaches that provide a balanced system that supports all life, not just humans.		Nancy Thompson
17102	4	ALTGEN - Alternatives - General	We also support actions to reduce the current demands for Colorado River water in order to increase the future availability of water for people and all life which depend on the river.	Lahontan Audubon Society	Rose Strickland
17241	46	ALTGEN - Alternatives - General	We urge Reclamation to establish a process for developing a post-2026 Colorado River management framework that results in a resilient water supply and healthy rivers for all life - the people, the birds, and all the creatures that rely on this resource.	National Audubon Society	Jennifer Pitt
20221	7	ALTGEN - Alternatives - General	initiate conservation measures for water use that mitigate excessive downstream use of water actually allocated to the upstream coalition states.		Ken Jensen
20341	23	ALTGEN - Alternatives - General	* Evaluation of alternatives that manage reservoirs based on actual hydrology and total system contents, rather than simply Lake Powell and Lake Mead elevations as under the current 2007 Interim Guidelines.	Imperial Irrigation District	Shields, Tina L
20407	1	ALTGEN - Alternatives - General	A. Sharing the Bmdeos of Balancing the Colorado River 5Ystem Reclamation should consider assessing how each water user can contribute to reducing the supply and demand imbalance in the system that has resulted from overallocation of water supplies, the impacts of climate change, and long-term drought. Since 2000, this supply and demand imbalance has led to the depletion of reservoir storage and most recently threatened critical infrastructure at Lake Powell. However, the burdens associated with protecting the Colorado River System should not fall disproportionately on any particular state, sector, or water user. Instead, these burdens must be shared across the Basin by all who benefit from the Colorado River.	Arizona Department of Water Resources	Tom Buschatzke
20417	25	ALTGEN - Alternatives - General	We further agree that a guiding concept should be the overall integrity of the Colorado River and its tributaries, recognizing the need for stewardship of the Basin's ecological, spiritual, and/or cultural resources, while providing water for Tribal Nations and other human and natural uses.	Western Resource Advocates	Bart Miller
20438	24	ALTGEN - Alternatives - General	1. Measures to protect the Basin's physical infrastructure;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20469	15	ALTGEN - Alternatives - General	A possible path forward is explained in an April 2023 paper by Jack Schmidt, Charles Yackulic, and Eric Kuhn, which concludes by saying, "If Basin-wide long-term average water consumption is reduced by 13 - 20%, reservoir storage could be maintained and potentially increased, providing a buffer against interannual variability in water supply that has supported economic and population growth in the Basin. Over longer time scales, water supply allocations will likely need to continue to be adaptive and responsive to changes in runoff under future climate change."	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20473	6	ALTGEN - Alternatives - General	Regional Water Infrastructure Considerations While possibly outside of the scope of the Post-2026 guidelines, a regional water plan may be necessary to protect the system and more fully utilize the waters Basin States receive. California has an elaborate water infrastructure, which allows it to bring water from the north into the southern part of the state. It also benefits from significant wet seasons, but it is unable to capture the runoff due to lack of storage and because it sends a significant amount of the precipitation to the ocean to protect the environment. While a state issue and likely outside the scope of the Notice of Intent, California sends more water to the ocean than the entire Lower Basin Allocation, including Mexico's amount. A regional water plan may provide opportunities for regional collaboration of water projects (desal, importation, etc.) that could benefit the Basin States as a whole.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20480	2	ALTGEN - Alternatives - General	The period since 2007 has provided significant operational experience for both Reclamation and water managers, making it clear that the Post-2026 Operational Guidelines must address the imbalance between supplies and demands in the Colorado River Basin, an imbalance that evaporative and system losses contribute to.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20480	10	ALTGEN - Alternatives - General	In addition to the development of the Post-2026 Operational Guidelines, we also ask that Reclamation update and apply Part 417 reasonable and beneficial use determinations to ensure that water delivered is not being wasted. Each of our agencies signed on to the August 2022 Memorandum of Understanding by and among Colorado River Basin Municipal and Public Water Providers (MOU) in which we committed with water providers in all seven Colorado River Basin States to improving municipal and public water use efficiencies. Our agencies recognize that part of adapting to hotter and drier conditions requires improved efficiency and conservation. This commitment has also been demonstrated through the hundreds of millions of dollars in past and ongoing investments that our agencies have made in conservation and water use efficiency. However, less than 20% of consumptive uses in the Colorado River Basin are municipal and industrial. We cannot solve this problem on our own. In this time of shortages and other possible mandatory reductions, as the water providers with more junior rights, our agencies are potentially the most at risk if water is wasted. The Department must update the reasonable and beneficial use determinations across water sectors.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	16	ALTGEN - Alternatives - General	Finally, in a parallel process with the Post-2026 EIS, Reclamation should evaluate potential improvements at Glen Canyon Dam that could enhance its operational capacity and ensure that water can safely pass through the dam at low elevations.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	26	ALTGEN - Alternatives - General	Scope for Policy/Alternatives Considerations: The post-2026 Guidelines must identify and analyze policies and operating alternatives that will consider Basin storage and hydrologic conditions on a more holistic basis. During the Interim Guidelines, the Bureau and Basin States had to explore approaches that went beyond adjusting storage and releases from Lake Powell and Lake Mead to ride out a cyclical drought. They have also contemplated operations and strategies that consider the broader Colorado River system, employ mid-term hydrological forecasts and trends, and incorporate cooperative efforts to temporarily reduce demands because of extended drought accelerated by climate change. For the post-2026 NEPA process, it will be critical to learn from these and other experiences to anticipate system conditions and explore proposed operations and strategies that do more than review historical hydrology to inform relative changes to water allocation and storage between the Upper and Lower Basin and among the Basin states.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	25	ALTGEN - Alternatives - General	Design alternatives that can respond to a worst-case scenario of several sequential years of very low inflows to Lake Powell. Examples of worst-case scenarios might include: three consecutive 2.5 to 3.0 million acre-feet (maf) inflow years; or a mixed 10-year scenario in which five of the years are low (in the 2.5 to 3.0 maf inflow range), four years are about average, and one year is 150% of average. All alternatives should include the reductions in demand needed to maintain adequate water storage buffers in both Lakes Powell and Mead to avoid critical thresholds (e.g., maintain water levels above power pool elevations or above key resource or recreation-based elevations).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20490	32	ALTGEN - Alternatives - General	If DROA or DROA-like options are to be considered, then at Flaming Gorge Dam (FGD) Reclamation should consider: o Coordinated operations of FGD and considering using DROA operations for maximum environmental benefits through large magnitude, long duration spring peak flows when possible. Include consideration of other hydrological patterns (baseflows, flow spikes, etc.) that conform to the Upper Basin Recovery Program GREAT report recommendations (LaGory et al. 2019). o Evaluate options to prevent or reduce non-native fish passage through FGD such as screens, barriers, nets, and bubblers to protect native and federally-listed fish species populations. Consider mitigations such as funding rapid response actions below the dam. At GCD: o Evaluate options for temperature control devices or alternative operations with options to release both warmer and cooler water from GCD to better manage river temperatures below the dam within a suitable range to benefit native and federally-listed fish species populations. o If HFE sediment windows and operational timing are not adjusted in another process prior to Post-2026 operations, then consider adjustments to allow for implementation of HFEs from Lake Powell at lower water levels using the specific HFE adjustments have been recommended by the GCMRC sediment scientists (Salter and Grams 2023). This would allow for smaller HFEs to be considered in June when the reservoir level is at its highest, making use of sediment accrued throughout the year, to comply with the GCPA to protect cultural resources and recreation in the Grand Canyon. o Mitigate lower Lake Powell elevations by using bypass flows and flow spikes from GCD to disadvantage non-native fish such as smallmouth bass and green sunfish and to lower river temperatures, by installing passthrough barrier devices or nets, and by continuing to fund rapid response efforts below the dam. o Consider tying annual flow volumes out of GCD to multi-year inflows into Lake Powell so there is a more accurate link between outflows and actual water availability than just reservoir elevations.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20496	4	ALTGEN - Alternatives - General	The EIS should be based on actual Colorado River flows and scientific projections based on drought and climate change.		Morgan Sjogren
20608	3	ALTGEN - Alternatives - General	1. Manage with the water we get, not the water we wish to get. Design alternatives that address appropriate forecasting (over multiple nested timeframes) of available water inflows minus evaporative losses, and which explicitly incorporate robust climate data and modeling into an annual release implementation decision process that is conservative, flexible, and adaptive. Such a process should be transparent, directly engage NPS, Tribes, and the AMWG of the GCDAMP, in making release implementation recommendations to the Secretary of Interior, such that we store water during wet years, so that we maintain appropriate surface elevations and in-stream flows during extended periods of low water.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20608	7	ALTGEN - Alternatives - General	5. Prioritize incentives within the alternatives for water conservation, cooperative agreements, creative economic exchanges, engineering solutions to hydropower infrastructure, cooperative steps toward grid stability under lowering water level scenarios, and installation of barriers to fish passage through Glen Canyon Dam. Consider external factors and actions that could lessen conflict over water release volumes and patterns.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20608	12	ALTGEN - Alternatives - General	8. Frame the alternatives through the lens of securing Colorado River flows and a healthy CRE with associated benefits and impacts to the full array of natural, cultural, and socioeconomic resources, rather than a glorified plumbing system of water storage and delivery, which externalizes the costs to natural and human communities, and ignores both the foundational overuse of the Colorado River and the global context of human-caused rapid climate change.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20608	15	ALTGEN - Alternatives - General	In closing we here repeat and re-emphasize the important comment from our colleagues at Grand Canyon River Guides: 'Balancing and stabilizing the system so that long term average consumptive uses and losses do not exceed the natural supply is absolutely imperative for the long-term sustainability of the Colorado River system and must serve as a primary goal of the Post-2026 Guidelines. GCRG advocates that the BOR include an alternative in the EIS that focuses on maintaining this balance to avoid the current predicament. In our view there is a clear need to avert a future human and ecological catastrophe by meeting this goal. Therefore the purpose of the 2026 Operational Guidelines and Strategies should include a management regime to these ends. A possible path forward is explained in an April 2023 paper by Jack Schmidt, Charles Yackulic, and Eric Kuhn, which concludes by saying, "If Basin-wide long-term average water consumption is reduced by 13 - 20%, reservoir storage could be maintained and potentially increased, providing a buffer against interannual variability in water supply that has supported economic and population growth in the Basin. Over longer time scales, water supply allocations will likely need to continue to be adaptive and responsive to changes in runoff under future climate change."'	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20608	16	ALTGEN - Alternatives - General	2. Construct alternatives to allow for HFE's--especially spring-timed; for flows to prevent smallmouth bass and other eruptive predatory nonnative fish establishment, and other flow options arising out of adaptive management under accelerating climate change effects, as well as high enough flows for river running/recreation.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20608	17	ALTGEN - Alternatives - General	1. Manage with the water we get, not the water we wish to get. Design alternatives that address appropriate forecasting (over multiple nested timeframes) of available water inflows minus evaporative losses, and which explicitly incorporate robust climate data and modeling into an annual release implementation decision process that is conservative, flexible, and adaptive. Such a process should be transparent, directly engage NPS, Tribes, and the AMWG of the GCDAMP, in making release implementation recommendations to the Secretary of Interior, such that we store water during wet years, so that we maintain appropriate surface elevations and in-stream flows during extended periods of low water.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens

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20700	26	ALTGEN - Alternatives - General	Finally, Reclamation should prepare a full analysis of tradeoffs of demand reductions on communities, cultures, environment, economies, etc. that should be evaluated and then inform equitable decision making. This might be similar to a vulnerability assessment that is used to evaluate how climate change risks are distributed in communities.13	Grand Canyon Trust	Jen Pelz
20738	11	ALTGEN - Alternatives - General	To be able to integrate these multiple priorities into a durable management framework, the river system's overall structural deficit must be confronted. Whether it is through coordinated reservoir management, physical infrastructure modifications, transparent and predictable mechanisms for curtailing existing non-Indian water uses, investment in historically underserved communities including through innovative financing, or some combination of these (and potentially other) tools, the Basin needs to arrive at a more realistic alignment between water supply and demand. Reductions in water use will therefore be necessary.	Quechan Indian Tribe	Jordan Joaquin
20817	4	ALTGEN - Alternatives - General	1. Address the imbalance between available supply and demand. This will require permanent Lower Basin reductions under most if not all operating conditions.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20915	3	ALTGEN - Alternatives - General	The 1922 Colorado River Compact guided the water allocations for most of the previous hundred years. Given the challenges facing the Southwestern United States, we must construct a new compact that is even more forward-thinking. A healthy soils approach and other natural solutions to water conservation, water quality, drought, wildfire mitigation, and climate change mitigation must be actively studied and included in negotiations that will impact the next century's water supply and quality. By incorporating healthy soils conservation measures into the post-2026 Colorado River operations, we can help to ensure the long-term sustainability of the Colorado River watershed and the overall health of the people who live there.		Andy Shrader
20919	9	ALTGEN - Alternatives - General	Forbearance Required for Conserved Water The 2007 Interim Guidelines included provisions for the creation, storage and delivery of conserved water. The creation, storage and delivery of conserved water requires the forbearance of parties that would otherwise be entitled to take delivery of the conserved water. Alternatives in the Post-2026 EIS that contemplate the creation, storage and or delivery of conserved water must consider the appropriate forbearance mechanisms.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	16	ALTGEN - Alternatives - General	Review of Beneficial Use to Improve Water Use Efficiency The Post-2026 Operations must also consider beneficial uses in the basin in a way that takes into consideration climate change and minimizes waste under contemporary conditions. Beneficial use considerations should maximize the scarce water supplies for all and provide flexibility to the water users to determine appropriate improvements in water use practices. Specifically, in the Lower Basin, Reclamation should implement beneficial use standards for all contractors with respect to efficiency determinations as set forth in 43 CFR Part 417, including the "area to be irrigated, climatic conditions, location, land classifications, kinds of crops raised, cropping practices, type of irrigation system in use, conditions of water carriage and distribution facilities, record of water orders, and rejection of water orders, general operating practices, operating efficiencies and methods of irrigation of the water, amount and rate of return flows to the River, municipal water requirements and the pertinent provisions of the Contractor's Boulder Canyon Project water delivery contract." Reclamation should also adopt similar efficiency standards in the Upper Basin.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	24	ALTGEN - Alternatives - General	System conservation has been used to a large extent in the Lower Basin, but additional opportunities for conservation in the Upper Basin through the System Conservation Pilot Program (SCPP) have not been fully realized. The Post-2026 Operations should consider expanding the Lower Basin System Conservation program to facilitate increased participation by higher priority water users as well as expanding the Upper Basin System Conservation Pilot Program.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20947	14	ALTGEN - Alternatives - General	Each alternative needs to thoroughly analyze the operational and drought effects on recreation and the environment both downstream from Glen Canyon and Hoover Dams as well as on affected river segments in the Upper Basin. Flow needs that support river recreation opportunities and sensitive environmental factors are complex, however there is robust scientific information that supports flow needs for recreation in places like the Grand Canyon and Cataract Canyon of the Colorado River, in addition to many other river segments in the Colorado River Basin. The alternatives and the environmental analysis needs to include reference to and robust analysis of science-based flow information for both river recreation and environmental factors that are affected by operations at Glen Canyon and Hoover Dams and upstream reservoirs in the basin.	American Whitewater	Kestrel Kunz
20963	16	ALTGEN - Alternatives - General	[...] Capitalizing on the Infrastructure Investment and Jobs Act, Inflation Reduction Act, and other funding opportunities, including watershed management, that will allow us to build the efficiency and conservation mechanisms needed to enable us to do more with less.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner

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20972	5	ALTGEN - Alternatives - General	If reductions are to occur, the Bureau must make reductions from the contractual entitlements of water users, not their actual usage in any given year. Using actual usage is not equitable because it is the product of different practices for different users. Further, in determining who takes reductions and in what volumes, the Bureau must certainly consider whether users have access to other sources, whether users have an opportunity to further conserve, and/or whether users have historically forgone opportunities to conserve. As part of its analysis, the Bureau must include this evaluation and disclose to the public which users may receive a favorable exercise of discretion, why and with what environmental effects.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	6	ALTGEN - Alternatives - General	Within the Law of the River, the Bureau has considerable room to innovate to address shortages on the Colorado River. Expanding the legal and practical tools available to the Bureau and to users may in some instances require separate administrative proceedings, but such tools should be available for all or most of the Bureau's post-2026 period and therefore should be analyzed as part of the development of the EIS. Those separate processes should be commenced now so they can produce better outcomes in the near term. Such tools should include restructuring the ICS system and prioritizing voluntary compensated conservation as described below, and also include the strengthening of the effectiveness of the Part 4 I 7 process, looking at other market-based systems for reallocating water, reevaluating how modeling is done and the timelinc on which it is completed, and augmentation of water supplies throughout the Basin.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	14	ALTGEN - Alternatives - General	The post-2026 guidelines should aim to strengthen the Colorado River system by supporting all water users in the Basin and ensuring the livelihoods of our communities and the security of our Nation, while still providing for the protection of its extraordinary ecosystem. It is no small task	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20985	7	ALTGEN - Alternatives - General	Further, if mandatory, uncompensated reductions are to be made, the Bureau should consider whether water users have access to other sources of water, whether water users have an opportunity to become more efficient or conserve water, and/or whether water users have historically forgone opportunities to conserve in determining what water users take reductions and in what volumes. These factors most certainly effect outcomes and the severity of impacts those reductions have on water users and, therefore, must be considered. As part of its analysis, the Bureau must not only include this evaluation but also disclose to the public which users may receive a favorable exercise of discretion, why and with what environmental effects.	Bard Water District	meghan noblelaw.com; Ray Face
20986	9	ALTGEN - Alternatives - General	New Mexico recommends prioritizing durable long-term reductions in consumptive use over shorter-term and temporary projects in considering Post-2026 Operations.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
21064	3	ALTGEN - Alternatives - General	3. Please determine annual water allocations based on current store water and use rather than projected stored water.		Bridget Dorsey
21081	6	ALTGEN - Alternatives - General	Furthermore, on state and watershed levels, it may be prudent to create frameworks that consider a percentage-based allocation system rather than static amounts based on the available amount of water. In this manner, water may be but to better uses and allow flexibility to water users. In Nevada, the state Supreme Court has allowed a localized plan that supersedes prior appropriation in regards to managing aquifers, which may set a precedent moving forward.	Dolores River Boating Advocates	Rica Fulton
21104	2	ALTGEN - Alternatives - General	2. Determine allocations for each year proportionally based on use, and based on current stored water, not projected stored water		Lily Bosworth
21115	3	ALTGEN - Alternatives - General	AMWA's member agencies in the Basin have diverse needs; therefore, we encourage the Bureau of Reclamation (Reclamation) to ensure that its development of the post-2026 guidelines and related federal actions on the Colorado River will: * Prioritize public health and safety; * Support federal research to operations improvements of water supply forecasts; and	Association of Metropolitan Water Agencies	Thomas Dobbins
21124	3	ALTGEN - Alternatives - General	Finally, establishment of broad environmental goals for the System should be a component of the Post-2026 Guidelines. Although Reclamation recognized the potential for some environmental impacts in the EIS for the 2007 Guidelines, subsequent analysis and monitoring demonstrates that certain significant impacts were inadequately evaluated at that time. We posit four major types of environmental considerations for the System post-2026; sediment management, nonnative fish, ongoing recreational value of Glen Canyon, and the Colorado River Delta.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21124	7	ALTGEN - Alternatives - General	Given our knowledge of evaporative losses, it is imperative to analyze the differences in evaporative losses depending on the location of reservoir storage. These analyses should consider the losses associated with storing all System water in Lake Mead versus Lake Powell. It is also necessary to seriously consider the operation of Lakes Powell and Mead as a single reservoir. In the Post-2026 Guideline process, Reclamation has an opportunity to envision these possibilities as alternatives, with the goal of ensuring that the Post-2026 Guidelines represent the best possible water savings for all users in the Colorado River Basin while also maximizing environmental benefits and minimizing environmental harms as water is moved through the Grand Canyon reach.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck

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21124	8	ALTGEN - Alternatives - General	Conservation incentives in the Post-2026 Guidelines must actually promote conservation. The Post-2026 Guidelines should incentivize cooperative conservation projects in the Upper Basin that are separate from any mandatory reductions, through provisions that resemble ICS and are designed specifically for the Upper Basin. An example of such an incentive would be to give individual Upper Division States the opportunity to bank conserved consumptive uses in system storage (all CRSP reservoirs and Lake Mead), then make the water available for either future compact compliance. But in its analysis of these conservation measures, the NEPA analysis must clearly consider the beneficial roles of non-consumptive uses that have historically fallen outside of traditional legal and accounting systems, such as environmental uses, unquantified tribal water rights and non-consumptive uses, and groundwater, such that "conservation" does not come at the expense of unmeasured but valuable roles water plays in the Colorado River Basin.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21301	1	ALTGEN - Alternatives - General	The Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead were adopted to provide for the coordinated operations of Lake Powell and Lake Mead during low reservoir conditions for an interim period ending in 2026. Valuable operating experience has been acquired during that interim period. System vulnerabilities have also been revealed, which should be analyzed and addressed in the next set of interim guidelines. Modifications to the interim guidelines should be done in as equitable a manner as possible to all parties reliant upon the Colorado River system, while respecting the Law of the River, to the greatest extent possible.	Mohave County Water Authority	Jamie Kelley
21302	2	ALTGEN - Alternatives - General	Strategies Proposed for Consideration. The following general management strategies shouldbe analyzed within the range of alternatives considered in this NEPA process, with the actual details of these strategies and how they might be incorporated within alternatives to be further developed through stakeholder discussion and modeling. Determining volumes available for delivery within the Annual Operating Plan based upon a more holistic view of system conditions, including whole system storage values, nearterm water supply/runoff forecasts, and long-term hydrologic trends. Adjustment of water allocations on a more gradual, continuous, and predictable basis, moving away from current "trigger and cliff' methodologies that impose large annual step-changes in supply at specific thresholds. Establishing operational parameters that promote system storage recovery over the medium term and the ongoing minimization of key water risks, with specific management approaches or pre-planned responses identified and tied to thresholds that avoid critical risks, provide reasonable protection for high-priority rights holders (including tribal rights), and ensure environmental compliance. Creative and flexible use of reservoir storage in a manner that benefits continued investments in water conservation and efficiency, co-investment in water supply solutions, and intra- and inter-state and international cooperation in managing water risk. This would include continuation of the ICS rules with certain modifications to minimize operational risks associated with !CS storage and withdrawals. Management policies that will specifically support transactional and transitional behaviors among water users that can mitigate water risks at the ground level, such as city-to-city exchanges, dry-year option arrangements, short- or long-term leases, mutually beneficial investments in agricultural lands and new or improved infrastructure.	City of Phoenix	Cynthia Campbell
6005	1	ALTNO - Alternatives - No Action	Please leave this whole area alone... it should be touchless!!!		Anita Charlet
17241	43	ALTNO - Alternatives - No Action	Use both baseline conditions and a no action alternative as points of comparison for proposed action alternatives - The impacts of the climate crisis and the biodiversity crisis in the Colorado River Basin are already evident. While Reclamation is not required to mitigate the impacts of these crises, the agency's analyses can be a useful way for the public to understand how the Basin is expected to change over time. Reclamation's evaluation of action alternatives should include comparison to both a baseline and to a no action alternative. The baseline is comprised of the affected environment, a description of the environment as it exists today. The affected environment is essentially a snapshot in time. The no action alternative projects changes to baseline conditions that are not the result of the action alternatives but rather the result of other changing conditions, for example climate change. We urge Reclamation to include analyses that compare action alternatives to the baseline as a way to identify how conditions are expected to change in the Colorado River Basin. Stakeholders need this information to adapt to changing conditions and to understand how the impacts of proposed action alternatives will add to other impacts that will accrue over time.	National Audubon Society	Jennifer Pitt
20341	9	ALTNO - Alternatives - No Action	The No Action Alternative should be developed in consultation with the Basin States and default to the 1970 Criteria for Coordinated Long-Range Operation of Colorado River Reservoirs upon expiration of the 2007 Interim Guidelines, 2019 Drought Contingency Plan ("DCP"), and other agreements and Minutes that will no longer be in effect post-2026.	Imperial Irrigation District	Shields, Tina L
20481	23	ALTNO - Alternatives - No Action	As mentioned previously, the Basin States intend to develop a consensus alternative for consideration, as we did during the development of the 2007 Guidelines. However, there are outstanding questions as to what will constitute the "No Action Alternative" for purposes of the Post-2026 EIS. In particular, certain provisions of the 2007 Guidelines and DCP related to ICS extend beyond 2026 and should be included in the No Action Alternative. We request that you consult the Basin States for input on the development of the No Action Alternative.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke

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20817	16	ALTNO - Alternatives - No Action	The NOI recognizes that the 2007 Guidelines, the DCPs, and other reservoir and water management agreements and decisional documents are scheduled to expire at the end of 2025. Amending these documents and agreements to extend their current expiration dates would require federal action. Therefore, the No Action alternative cannot include the extension of the 2007 Guidelines or the DCPs. The No Action Alternative must acknowledge that upon expiration of the 2007 Guidelines, the operating criteria for Lake Powell and Lake Mead will revert to the long-range operating criteria used to model baseline conditions in the Final Environmental Impact Statement for the Interim Surplus Guidelines dated December 2000. However, details regarding implementation of the long-range operating criteria are unclear. We request that the Secretary consult the Basin States for input on the development of the No Acon alternave.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20919	20	ALTNO - Alternatives - No Action	No Action Alternative While Section 8.C of the 2007 Guidelines made an assumption of reverting to a 70R strategy after the interim period, too much has changed on the Colorado River for this to be a realistic assumption of future management of the River. CAWCD requests that the United States consult with the Basin States, CAWCD and other Colorado River Contractors on the development of a No Action Alternative.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20927	4	ALTNO - Alternatives - No Action	The no-action alternative should assume as its starting point the expiration of the 2007 Interim Guidelines as provided for in section 8.C of the ROD for the 2007 Interim Guidelines. Section 8.C provides that upon the expiration of the 2007 Interim Guidelines, the operating criteria for Lake Powell and Lake Mead are assumed to revert to the operating criteria used to model baseline conditions in the Final EIS for the Interim Surplus Guidelines dated December 2000 (i.e., modeling assumptions are based upon a ?OR Strategy for the period commencing January 1, 202_6 (for preparation of the 2027 Annual Operating Plan).	Front Range Water Council	Alan Salazar
20932	11	ALTNO - Alternatives - No Action	THE NO ACTION ALTERNATIVE CANNOT EXTEND THE 2007 GUIDELINES OR THE 2019 DROUGHT CONTINGENCY PLANS ("DCPs") The NOI recognizes that the 2007 Guidelines, the DCPs, and other reservoir and water management agreements and decisional documents are scheduled to expire at the end of 2025. Amending these documents and agreements to extend their current expiration dates would require federal action. Therefore, the No Action alternative cannot include the extension of the 2007 Guidelines or the DCPs. The No Action Alternative must acknowledge that upon expiration of the 2007 Guidelines, the operating criteria for Lake Powell and Lake Mead will revert to the long-range operating criteria used to model baseline conditions in the Final Environmental Impact Statement for the Interim Surplus Guidelines dated December 2000. However, details regarding implementation of the long-range operating criteria are unclear.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20938	9	ALTNO - Alternatives - No Action	No Action Alternative Operations under the Guidelines and 2019 DCP have revealed the danger of managing a system based on a single, assumed future hydrology rather than a variable one; the shortcomings of balancing releases without proper constraints; the problems associated with basin reservoir operations on forecasting; and, reservoir operations that favor, or can be manipulated to favor, one basin over the other. Accordingly, Utah will not support a No Action Alternative for the Post-2026 EIS that extends the 2007 Interim Guidelines or the 2019 DCP. Moreover, we will not support a No Action Alternative that reverts to the operating criteria used to model baseline conditions in the December 2000 Final Environmental Impact Statement for the Interim Surplus Guidelines ("long-range operating criteria") as interpreted by Reclamation. There are outstanding questions as to what will constitute the No Action Alternative. In order for the Basin States to develop a consensus alternative, it is essential that Reclamation consult with Basin States on what will constitute the No Action Alternative as soon as possible.	Colorado River Authority of Utah	Betsy Coleman
20942	1	ALTNO - Alternatives - No Action	NO ACTION ALTERNATIVE: Reclamation should confirm that the statutorily required "no action" alternative under NEPA is an analysis of the Long-Range Operating Criteria, not the 2007 interim guidelines which will sunset in 2025.	Dolores Water Conservancy District	Ken Curtis
20945	20	ALTNO - Alternatives - No Action	The NOI recognizes that the 2007 Guidelines and the DCPs, and related reservoir and water management agreements and decisional documents are scheduled to expire December 31, 2025. Amending the 2007 Guidelines, the DCPs, and related agreements to extend their current expiration dates requires federal action. Therefore, the No Action alternative cannot include the extension of the 2007 Guidelines or the DCPs. The No Action Alternative must acknowledge that pursuant to Section 8.C of the 2007 Guidelines, absent the issuance of a Record of Decision for Post-2026 Operations at Lake Powell and Lake Mead, at the conclusion of the effective period of the 2007 Guidelines, the operating criteria for Lake Powell and Lake Mead are to revert to the long range operating criteria used to model baseline conditions in the Final Environmental Impact Statement ("FEIS") for the Interim Surplus Guidelines dated December 2000 ("2000 ISGs") (i.e., modeling assumptions based upon a 70R Strategy for the period commencing January 1, 2026 (for preparation of the 2027 AOP)). There are outstanding questions related to the long range operating criteria used to model baseline conditions in the FEIS for the 2000 ISGs. Colorado respectfully requests the Secretary and Reclamation consult with Colorado and the other Basin States on that criteria, modeling assumptions, and the No Action Alternative.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell

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20952	9	ALTNO - Alternatives - No Action	The No Action Alternative should clearly describe the current operational, regulatory, and legal framework that govern water storage and deliveries. Disclose the potential long-term impacts of reduced water supplies on agricultural, municipal, and tribal uses, cessation of hydropower caused by dead pool, and other possible scenarios to fully inform the public about consequences of continuing the status quo. Address what changes to operations or modifications of contracts may be needed if consensus of the Basin states and Mexico cannot be reached before the current agreements expire at the end of 2026.	Environmental Protection Agency Region IX	Robin Truitt
20982	2	ALTNO - Alternatives - No Action	o The no-action alternative in the NEPA process should be based on the long-range operating criteria developed pursuant to P.L. 90-537, subject to further consultation with appropriate local water management entities in Colorado, the State of Colorado, and other Basin States needed to resolve any outstanding questions regarding their application.	Southwestern Water Conservation District	Steve Wolff
Form 3	-	ALTONEDAM - Alternatives - One Dam	A sustainable future for the river will require using less water and also rethinking Glen Canyon Dam. -The EIS should analyze the full bypass of Glen Canyon Dam, using Lake Powell as a backup facility. As climate change continues to reduce flows on the river, the dam becomes more of a liability preventing water from flowing downstream. Fully bypassing the dam to allow natural flows and sediment downriver would give the river, its users, and its ecosystem the most flexibility and adaptability in a drier future.	Glen Canyon Institute	
Form 3	-	ALTONEDAM - Alternatives - One Dam	The EIS should analyze a Fill Mead First model, prioritizing water storage in Mead before Powell, including a dont fill past 3,550 policy at Lake Powell reservoir. For most of the past decade, there hasnt been enough water in the Colorados mainstem reservoirs to fill either Lake Powell or Lake Mead. If there isnt enough water to fill either one, it doesnt make sense to needlessly drown the national park-caliber canyons in Glen. Fill Lake Mead first, and give Glen Canyon the opportunity to continue its amazing restoration.	Glen Canyon Institute	
Form 3	-	ALTONEDAM - Alternatives - One Dam	analyzing the full bypass of the dam would give the river its users and its ecosystem the most flexibility and adaptability in a drier future. in the years since lake powell reservoir has declined we have seen an amazing reemergence of wonders like cathedral in the desert gregory natural bridge as well as and lush riparian ecosystems and priceless archeological sites. the eis should analyze the full bypass of glen canyon dam	Glen Canyon Institute	
Form 5	-	ALTONEDAM - Alternatives - One Dam	Long-term, equitable, sustainable solutions in the EIS should include: 1. Creating a "Grand Canyon Restoration Alternative" that includes bypassing and decommissioning Glen Canyon Dam, and storing all of the Colorado River's water in Mead Reservoir instead of Powell.	Save the Colorado	
19	1	ALTONEDAM - Alternatives - One Dam	I have a brief comment regarding alternatives that that should be analyzed in the draft EIS and wanted to note that looking at alternatives where either like Mal, like Powell, or like should be decommissioned and then focusing on either filling one of those reservoirs. it's not necessarily a great idea, but it should be analyzed in full in the draft, EIS,		Kestrel Kunz
205	1	ALTONEDAM - Alternatives - One Dam	Glen canyon is not only one of the biggest environmental disasters to be created it also is outdated and potentially failing technology. If we contuie with more years of reduced inflows the ability to generate power could become an issue that will cost taxpayers money and still not solve the problem. Filling lake mead and draing the resivor behind glen canyon does a myriad of things for our river system. The biggest benifit is a consolidation of a resource into a resivor better suited to handle water. What I mean by this is the sandstone powell is built in,is an absorbent rock compared to the basement layers that lake mead is housed. This eliminates as much loss yo seepage while also reducing surface evaporation by having one resivor evaporating instead of the two we currently have.		everett Strazza-Whalen
364	1	ALTONEDAM - Alternatives - One Dam	Please drain lake powell and decommission glen canyon dam. The waste of tax payer dollars is egregious and will become a deepening burden. Propping up this failing storage unit is only going to become a money sink for the BOR, and funds can be much better directed towards other projects. It is truly just a matter of time before glen canyon dam needs to be removed.		Dan Mateer
463	1	ALTONEDAM - Alternatives - One Dam	And lake Powell needs to be preserved. Lake mead is NOT our concern. Lake Powell is. And theyâ€™ve had 20 years to prove they are not responsible with the water theyâ€™ve been given. Again, Iâ€™m someone who, according to my own experiences, should feel the total opposite about lake mead. But it doesnâ€™t take a lot of common sense to figure out that the current water situation isnâ€™t working. And robbing Peter to give to Paul isnâ€™t a solution. Rewrite the water laws. Preserve lake Powell.		Sage Black

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782	5	ALTONEDAM - Alternatives - One Dam	First, we bring to your attention a recent scientific paper published in April 2023 by Schmidt et al., titled, "The Colorado River water crisis: Its origin and the future"9. The paper supports the general thesis that climate-induced warming will further deplete flows in the Colorado River. In addition, the paper's central point is that reduced flows will necessitate a rethinking of reservoir operations, and the authors propose a 'one reservoir solution' stating, "Future policy debate about reservoir operations will inevitably concern whether most, or all, reservoir storage should be in Lake Mead or in Lake Powell. The choice of one or the other will result in significantly different environmental and recreational outcomes for Glen Canyon and Grand Canyon." We believe that the post 2026 Guidelines and Strategies must include an alternative that bypasses and decommissions Glen Canyon Dam, and drains what water is left in Lake Powell down into Lake Mead. This "one reservoir" solution will be dramatically cheaper, hugely environmentally beneficial to Glen and Grand Canyons, and less politically corrosive than drying up a ~million of acres of farms to try and temporarily save Lake Powell. This alternative is also a "Nature-Based Solution" that will not only repair the delicate ecology of Glen and Grand Canyons, but will provide a long-term climate solution for the Colorado River as flows decrease over time. Further, we call this alternative the "Grand Canyon Restoration Alternative" because of its profound impacts on restoring the ecology of one of America's most renowned National Parks as well as one of the Seven Natural Wonders of the World.	Save the Colorado	Gary Wockner
782	7	ALTONEDAM - Alternatives - One Dam	Third, USBR must enact policies that try to save Lake Mead using drought plans, conservation plans, water allocation plans, reservoir-draining or farm-drying plans, crop switching plans, or augmentation through desalination.	Save the Colorado	Gary Wockner
799	1	ALTONEDAM - Alternatives - One Dam	I am writing to urge you to include in the scope of the EIS an analysis of impacts, both positive and negative, for an alternative which includes the elimination or significant reduction (by any of a number of means, including bypass) of water retention behind the Glen Canyon dam. It is crucial that the alternatives included in the EIS consider making Lake Mead the primary reservoir from which water can be allocated to both the upper and lower states.		Janet
807	1	ALTONEDAM - Alternatives - One Dam	In planning for the future of the Colorado River , please consider FILLING LAKE MEAD FIRSTâ€¦when it is brim full then additional waters can be again stored in Lake Powell and upper river reservoirs with Powell being the last lake to retain water. The reasoning is that some of Americaâ€™s wildest and most scenic canyons have again emerged from Lake Powell as it drops its lake level during the current and seamingly continueing drought. Seems by filling Lake Mead first we can again and still begin to enjoy the wilderness of these once drowned canyons all over again. If and when additional rains fall and ALL other reservoirs are filled â€¦then and only then should water again be allowed to be impounded by Lake Powell. I see this policy as to no threat to the continued use of Colorado River water and still with a side benefit of being able to once again roam the remote hidden side canyons of Glen Canyon.		TW Kreuser
832	4	ALTONEDAM - Alternatives - One Dam	1. Decommissioning Glen Canyon Dam and storing the water in Lake Mead.		Gary Wockner
832	8	ALTONEDAM - Alternatives - One Dam	3. Enacting conservation programs to save Lake Mead.		Gary Wockner
835	1	ALTONEDAM - Alternatives - One Dam	I am writing this to encourage you to go ahead and plan on bypassing Glen Canyon dam in order to fill Lake Mead.		CANDI WARNING
900	1	ALTONEDAM - Alternatives - One Dam	It is my conclusion that Glen Canyon Dam and its outdated hydraulic system are a threat to the systemsafe and continuous delivery of water to the lower states, including California where I live. A sustainable future for Glen Canyon, the Grand Canyon and the entire river means the full bypass of the dam, and filling Lake Mead first.		Ernest Long
1279	1	ALTONEDAM - Alternatives - One Dam	It's time to recognize the damage of Lake Powell, a changing climate and the opportunity to revitalize the natural state of the Colorado river through Glen Canyon.		Martha Tinker
1323	1	ALTONEDAM - Alternatives - One Dam	On a visit to Coyote Gulch in Utah and the stretch of the Escalante River into which it flows, I have seen the re-emerging natural environment upstream from the Glen Canyon dam and Lake Powell. Given that remarkable recovery, and the precarious state of reservoirs Powell and Mead, I believe this Environmental Impact Statement requires a holistic look at the river system, with new eyes that take nothing for granted, and which don't "see" sunk costs.		Harry Newell
1323	2	ALTONEDAM - Alternatives - One Dam	This new review should incorporate studies of options not previously considered, e.g. allowing Mead to fill to near full pool before retaining any of the river's flow behind the Glen Canyon Dam. Flooding the spectacular landscapes of Utah's Glen Canyon, while exposing both Mead and Powell to wasteful evaporation seems ill-considered in light of events unforeseen at the time of dam construction.		Harry Newell

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1829	1	ALTONEDAM - Alternatives - One Dam	Given climate change, an increasingly warmer and drier climate in the Southwest, combined with a growing population making more demands for water, I would think it more prudent and economical to realize that trying to continue operating both Lake Mead and Lake Powell is no longer practical. The better situation would be to store all the water in one reservoir Â– Lake Mead Â– thereby reducing loss due to evaporation. I realize this suggestion/solution will not be met warmly in Page, Arizona, but a changing climate requires changing conditions. On the positive side, returning Glen Canyon to its former appearance will lead to greater tourism and somewhat mitigate the economic downturn caused by the removal of Lake Powell.		Jim Podesta
1992	1	ALTONEDAM - Alternatives - One Dam	Fill Mead First....stop wasting water on evaporation !!		Claude/David Hamilton/Schneider
2277	1	ALTONEDAM - Alternatives - One Dam	The emerging beauty in Glen Canyon must be taken into consideration when we choose where to store water. We need to prioritize water storage in Lake Mead-not Glen Canyon. We will probably never fill both reservoirs again, so letâ€™s fill Mead first. I favor at least analyzing the full bypass of Glen Canyon Dam. Given the evaporation and seepage in Lake Powell, this will provide the most water for all the Colorado Riverâ€™s users.		james koeller
2301	1	ALTONEDAM - Alternatives - One Dam	The EIS needs to analyze the option of draining Lake Powell with what-ever mechanism, blow out or bypass the dam with a diversion tunnel. All climate scientists predict that Climate Change will steadily worsen over the next 50 years. Lake Powell water levels are going to drop and never recover. Powell does not release water directly to any community but Page. The huge surface area (though shrinking) exposes so much water to sunlight and wind that evaporation is a major loss. However, Lake Mead is the vicinity of canals/pipelines serving So. Calif. Nevada and Arizona. Mead volume is huge due to the depth, and it's area is smaller than Powell. Let Powell become a river to Mead, saving water.		
2484	1	ALTONEDAM - Alternatives - One Dam	Glen Canyon should be restored and designated as a new National Park.		Ben Zuckerman
2614	1	ALTONEDAM - Alternatives - One Dam	The EIS should adopt/embrace a 'Fill Lake Mead FirstÂ" approach, prioritizing water storage in Mead before Powell (donÂ't fill Lake Powell past 3,374 feet elevation).		Kenny, Ray
6130	1	ALTONEDAM - Alternatives - One Dam	Keep water in Lake Powell!!!!!! California is draining water into the ocean they dont need it!!!!		Katelin Parcell
12812	2	ALTONEDAM - Alternatives - One Dam	The EIS should analyze the full bypass of Glen Canyon Dam. Climate change has led us to an unpredictable place with regards to water availability, as has been shown in the last few years. Lake Powell needs to have the flexibility and adaptability to respond to a potentially arid future. A full bypass could be necessary to preserve downstream ecosystems and economies, so it should be included in the EIS.		Theo Gochnour
12844	1	ALTONEDAM - Alternatives - One Dam	I am of the firm opinion that Lake Mead should be filled first to near capacity even if this results in a lower Lake Powell. I hope you will also look at a full bypass of Glen Canyon Dam, it being superfluous and damaging to the environment and wildlife.		ikmarchini
14571	1	ALTONEDAM - Alternatives - One Dam	Please consider bypassing the Glen Canyon Dam and filling Lake Mead first. 1. This will reduce the evaporative water loss from Lake Powell and so will better conserve water in a future that is likely to see continued drought. 2. It will also restore access to many of the wonders of Glen Canyon that were flooded by the dam.		Pfeiffer, Wayne
15900	1	ALTONEDAM - Alternatives - One Dam	Don't do what you did to the Baby Boomers by taking away Glen Canyon Dam.		margie Chemnick
16770	1	ALTONEDAM - Alternatives - One Dam	I realize this is the final hour of comments, but I wanted to voice my concern that the current management of the reservoir behind Glen Canyon Dam is an ineffective, wasteful and ecological nightmare. Iâ€™m advocating for the removal of the dam or at very least utilizing complete dam bypasses to allow the Colorado to flow freely again. The ecological benefit to an unobstructed river through Glen Canyon would be tremendous and the sustainable recreational uses phenomenal.		Keegan Kuhn
16780	1	ALTONEDAM - Alternatives - One Dam	For these reasons, I would like to see post-2026 management plan and EIS evaluate multiple alternatives to the current situation. These include: 1. Continuing regulated operation under a "Fill Mead First" strategy that priorities water storage downstream. This should include a policy to not fill Powell above 3550' elevation, in order to permit the continued recovery of the amazing natural and cultural resources of Glen Canyon. 2. Fully bypassing the dam 3. Removal of the dam		Landon Sawaya

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16821	5	ALTONEDAM - Alternatives - One Dam	5. Assess the feasibility of the 'Fill Mead FirstÂ" model. Simply put, if there is not enough water to fill both Lake Powell and Lake Mead it makes more sense to fill Lake Mead first. This option may not be an immediate possibility but the BOR should put in a reasonable effort to assess its feasibility for the future.		Teal Lehto
16827	1	ALTONEDAM - Alternatives - One Dam	fill Mead first bypass Glen Canyon Dam free up the canyon		tom dodson
16859	1	ALTONEDAM - Alternatives - One Dam	One of the main benefits of protecting Glen Canyon and bypassing the dam is that it would help to maintain a reliable water supply for millions of people who depend on Lake Mead. The dam blocks 95% of the crucial sediment, preventing nutrient delivery and quickly deteriorating sediment levels within the Canyon. Bypassing the dam would allow water to flow more naturally through Glen Canyon Dam, helping to heal Grand Canyon ecosystems. In addition, bypassing the dam would permanently lower Lake Powell, exposing many more portions of Glen Canyon that have been flooded under the reservoir and allowing their recovery. This would mean that the flow of the Colorado River through Glen Canyon would be somewhat restored to normal and the reservoir would dwindle to just a small pool of water, essentially disabling the purpose of water storage. I hope this information has been helpful in understanding the importance of protecting Glen Canyon and bypassing the Glen Canyon Dam.		Nathan French
16860	1	ALTONEDAM - Alternatives - One Dam	* Please analyze the full bypass of Glen Canyon Dam * Please measure and account for the extensive resources that have emerged in Glen Canyon since climate change will be with us for many decades to come *Please analyze a "Fill Mead First" model that will prioritize water storage in Lake Mead * Please include a don't fill pasta 3,550 policy at Lake Powell		kathy dodson
16873	1	ALTONEDAM - Alternatives - One Dam	It is clear that current water practices in the Colorado River are no longer sustainable, and I strongly believe the post-2026 EIS plan should enable the full bypass of Lake Powell and fill Lake Mead first.		Jack Dodson
16897	1	ALTONEDAM - Alternatives - One Dam	I'd like to write in support of re-evaluating the purpose of lake powell. I'm a resident of Utah, and I'm very concerned about the long-term drought and future of water in the region. I'd like to support: * The analysis of a full bypass of glen canyon dam * evaluating the value of The numerous amazing environmental, and recreational resources in Glen Canyon * Analyzing a "fill mead first" model to help reduce evaporation and allow the full use of one reservoir		Corinna Camfield
16904	1	ALTONEDAM - Alternatives - One Dam	The Purpose and Need section for short term operations stated; "In order to ensure that Glen Canyon Dam continues to operate under its intended design, Reclamation may need to modify current operations and reduce Glen Canyon Dam downstream releases, thereby impacting downstream riparian areas and reservoir elevations at Lake Mead." GCPBA challenges the assertion that Glen Canyon Dam should continue to operate under its intended pre-1956 design. The premise that the intended design is inviolate is fallacious. As such, post 2026 operations should evaluate the purpose of Glen Canyon Dam as conditions due to climate change have drastically changed since 1956.	Grand Canyon Private Boaters' Association	john vrymoed
17337	1	ALTONEDAM - Alternatives - One Dam	I feel that the future of Glen Canyon is a future beyond Lake Powell, and a future where Glen Canyon is allowed to heal and return to its natural state.		Slade G Sheaffer
17337	2	ALTONEDAM - Alternatives - One Dam	Lake Powell as a water tank is highly inefficient--winding through hundreds of miles of Glen Canyon's sandstone, absurd amounts of water are lost through these porous walls. Meanwhile, Lake Mead downstream is also mostly empty. With current water overallocation, and no possibility of sustained higher precipitation in coming years, it is senseless to drown the natural wonders in Glen Canyon while a more efficient (and important) reservoir sits mostly empty a few hundred miles downstream.		Slade G Sheaffer
17337	3	ALTONEDAM - Alternatives - One Dam	1. The EIS should analyze the full bypass of Glen Canyon Dam - the dam's usefulness for power has greatly decreased along with Lake Powell's water levels, and as the reservoir drops further, the dam has become a liability and a threat. Dropping below dead pool threatens any flow through the Grand Canyon and to Lake Mead--a very possible scenario that would threaten a major crises for southwestern cities and states. Bypassing the dam would eliminate the possibility of this catastrophe while allowing Glen Canyon to begin restoring itself.		Slade G Sheaffer
17337	5	ALTONEDAM - Alternatives - One Dam	3. The EIS should analyze a "Fill Mead First" model - until a longer-term solution of bypassing Glen Canyon Dam could be realized, storing water in Mead should be prioritized, filling that reservoir before needlessly drowning the natural wonders of Glen Canyon and its many tributaries. Not only is Mead the more important reservoir, but it's the more efficient one. As mentioned above, Powell's sandstone walls make it a very leaky tank. A policy of "don't fill past 3,550 ft" should be implemented at Lake Powell, allowing the restoration of side canyons and their valuable ecosystems to continue.		Slade G Sheaffer
19830	1	ALTONEDAM - Alternatives - One Dam	overall management plan for the Colorado River basin must include plans for equitable water distribution and restoration of the health of both the Grand Canyon, Glen Canyon and a serious look at the viability of the dams on the river and itâ€™s tributaries.		Cristina Harmon

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19926	1	ALTONEDAM - Alternatives - One Dam	The decommissioning of Glen Canyon Dam will help restore integrity to the ecosystem in The Grand Canyon.		Jaye Mundy
19933	1	ALTONEDAM - Alternatives - One Dam	The Fill Mead First model should be adopted. As the drought continues, there hasnâ€™t been enough water in the Coloradoâ€™s mainstream reservoirs to fill either Powell or Mead. It doesnâ€™t make sense to needlessly store water in Lake Powell when that water is drowning one of the most beautiful canyons in the United States. If Lake Mead is filled, boaters who currently use Lake Powell could visit Lake Mead and have a very pleasurable experience. Lake Mead is much bigger than Powell and, with the addition of more water could easily accommodate local boaters and those who come from the Lake Powell area. As water in Lake Powell declines Glen Canyon has been restoring itself. Riparian ecosystems are re-developing. Plant and animal life are returning to the area where they flourished before the dam. Wonders of geology are re-emerging, as are some of the archeological sites which were drowned. One only needs to visit Cathedral in the Desert to see that Glen Canyon Dam never should have been built in the first place. And speaking of the dam, it should be dismantled. If you arenâ€™t going to dismantle the dam, then allow the water to bypass it and flow downstream. This would provide for the full restoration of Glen Canyon, and a more natural, free flowing river through the Grand Canyon.		Elisabeth Good
20007	1	ALTONEDAM - Alternatives - One Dam	Please go forward with the Glen Canyon Dam By-pass for the sake of the Grand and Glen not to mention reducing the surface area of the reservoirs to decrease evaporation.		Martin Kardon
20081	1	ALTONEDAM - Alternatives - One Dam	Lake Powell is a recreational place and allows others to visit such a beautiful place that isnâ€™t like any other in this world. Letâ€™s fill Lake Powell and continue the lively hood it brings people out on the water.		Alexis Whitney
20104	1	ALTONEDAM - Alternatives - One Dam	I hope that keeping water in Lake Powell will be a priority so that my family and all the other families like mine can continue to enjoy the lake.		Hayden Flores
20162	1	ALTONEDAM - Alternatives - One Dam	I strongly believe that the Glen canyon dam should be bypassed completely. I think that we should prioritize filling Lake Mead first. Lake Powell loses a tremendous amount of water to evaporation and absorption into the sandstone. The design of the lake itself just simply does not hold water in a sustainable way for our future. It doesn't make sense for it to be a reservoir in the first place. I understand that this is a difficult decision based on the consumers of energy from Lake Powell and the businesses that recreate on the lake. I think of it like this. When businesses open up a factory in a small town, the town booms for decades, and then the factory leaves the town, the people generally leave the town as well. We cannot expect to live in unlivable environments. A large population of humans simply should not be living in the Southwest during 120deg record-breaking heat. We must look to more compassionate and sustainable solutions. I also would like to add that I have been able to visit different parts of Glen canyon that have previously been inaccessible. The cathedral in the desert is one of the most moving places I have ever visited. I don't want to lose those places again. We've already lost so much from this natural wonder We really should be looking at different energy sources and water sources for the desert Southwest.		Kylie Anyce Bearden
20164	1	ALTONEDAM - Alternatives - One Dam	Glen Canyon Dam was considered by many to be one of the United StateÂ's greatest environmental mistakes. Lawmakers like Barry Goldwater and Stuart Udall, who signed off on the project, would go on to regret damming one of the most incredible canyons on earth. The environmental impacts of the dam are extensive, completely altering the Grand Canyon downstream, and drowning 186 miles of canyon upstream. If climate change means thereÂ's not enough water to fill both Powell and Mead, fill Mead first and let Glen Canyon continue its incredible recovery. The place known as 'AmericaÂ's lost National ParkÂ" is coming back to life, and the public is taking notice. Media outlets from around the world have flocked to witness Glen CanyonÂ's miraculous reemergence, sparking the imaginations of millions. When the dam was commissioned in 1956, there were no environmental laws to assess its impacts. Now that Glen Canyon has begun to reveal itself, the immense value of its resources needs to be accounted for as decision makers choose where to store water. Please consider a more sustainable future of our resources. Now is the time to redeem ourselves of one of the biggest envorimental mistakes.		Brett lewis allen
20184	1	ALTONEDAM - Alternatives - One Dam	I am writing my comment in support of draining "Lake" Powell and using the reservoir at a backup if Mead is ever full again. The dam initially destroyed and drowned thousands of miles of riparian habitats along with beautiful geological features, archeological sites, and destroyed the free flowing sections of the Escalante, San Juan, Dirty Devil, Colorado, and more. The basin is drying and it has been shown that a mostly full Mead would lead to less water loss that having each reservoir just barely full. There are ways to reengineer the dam so that a river flowing through could still produce electricity and take sediment into the canyons below. If that does not seem like an economical option, then it is entirely possible, and some would say highly plausible, that the dams time is up. We made a mistake some decades ago - we don't have to keep fueling it. The Colorado should be free flowing through Glen Canyon and waiting on action will only see the issues surrounding the dam worsen. Free the Colorado through Glen Canyon! Use Mead first! Restore what is lost.		Trey Kettering

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20234	1	ALTONEDAM - Alternatives - One Dam	The EIS should analyze the full bypass of Glen Canyon Dam.		Murray Smith
20234	3	ALTONEDAM - Alternatives - One Dam	The EIS should also analyze a 'Fill Mead FirstÂ" model, prioritizing water storage in Mead before Powell, including a 'donÂ't fill past 3525Â" policy at lake Powell Reservoir.		Murray Smith
20268	1	ALTONEDAM - Alternatives - One Dam	My comments are mainly in regards to the Glen Canyon Dam; I believe the Environmental Impact Statement should analyze the full bypass of the Glen Canyon Dam, and that failure to do so would constitute a failure to examine the full scope of possibilities and their environmental effects.		Rowan Epstein
20268	2	ALTONEDAM - Alternatives - One Dam	Given this, the EIS should analyze a 'Fill Mead FirstÂ" model. In this scenario, the Colorado River would run freely through Glen Canyon and the Grand Canyon, bypassing the Glen Canyon Dam; however, the dam would remain in place and able to store water if cooler, wetter conditions return. This model has many benefits: combining two reservoirs into one would greatly reduce their surface area, lessening the amount of water lost to evaporation; it would mitigate seepage, as Lake Mead has walls of hard volcanic rock rather than sandstone; and if there isnÂ't enough water to fill either reservoir, it simply doesnÂ't make sense to needlessly drown the dozens of national-park-caliber wonders in Glen Canyon.		Rowan Epstein
20268	5	ALTONEDAM - Alternatives - One Dam	I urge you to evaluate the benefits of decommissioning the Glen Canyon Damn and allowing the Colorado River to flow freely though Glen and Grand Canyons, giving Glen Canyon the opportunity to continue its amazing restoration and ultimately filling Lake Mead once again.		Rowan Epstein
20298	1	ALTONEDAM - Alternatives - One Dam	In your post 2026 EIS please consider the new engineering of Glen Canyon Dam that allows for a river run scenario. continue the restoration of Glen Canyon, and use Lake Mead as a one basin solution for water storage. Study sediment, returning ecosystems, and begin an updated recreation plan for the canyon. Restore Glen Canyon.		Jstauss
20342	1	ALTONEDAM - Alternatives - One Dam	I would like to make a comment about the Glen Canyon dam. This dam was a mistake and is an environmental disaster. I believe that with the increasing severity and frequency of drought in the west that it is time to remove the glen canyon dam and start restoring glen canyon.		dalton reed
20357	4	ALTONEDAM - Alternatives - One Dam	5. Access the feasibility of the "Fill First" model and prioritize Lake Mead if there is not enough water to fill both lakes.		Dylan Mori
20388	1	ALTONEDAM - Alternatives - One Dam	The future of the Colorado river is in the decline and the best way to support it is the decommissioning of the glen, canyon dam, and the restoration of Glen Canyon feeling that lake mead makes sense as there is less evaporation and no water loss due to the sandstone. Bureau of reclamation needs to focus on actually reclaiming the land and returning Glen Canyon to the former glory. Please drain like Lake Powell , and return the river to a river ! DRAIN LAKE POWELL, FILL LAKE MEAD!		Isaac Lindstrom
20469	13	ALTONEDAM - Alternatives - One Dam	7. Considering that the combined storage of Lake Mead and Lake Powell may rarely exceed 50% of capacity (Wheeler et al, 2022), what are the environmental, recreational, and hydropower tradeoffs when analyzing alternatives for preferential storage of water in Lake Powell or Lake Mead?	Grand Canyon River Guides, Inc.	Lynn Hamilton
20475	1	ALTONEDAM - Alternatives - One Dam	I am writing to implore the Bureau of Reclamation to protect the precious resources of Glen Canyon. In the years since Lake Powell reservoir has declined, we have seen an amazing reemergence of wonders like Cathedral in the Desert, Gregory Natural Bridge, as well as lush riparian ecosystems, and priceless archeological sites. The place known as 'AmericaÂ's lost National ParkÂ" is coming back to life, and the public is taking notice. Media outlets from around the world have flocked to witness Glen CanyonÂ's miraculous reemergence, sparking the imaginations of millions. When the dam was commissioned in 1956, there were no environmental laws to assess its impacts. Now that Glen Canyon has begun to reveal itself, the immense value of its resources needs to be accounted for as decision makers choose where to store water. Please consider the importance of Glen Canyon and avoid building harmful dams that divert water away from these natural resources.		
20479	1	ALTONEDAM - Alternatives - One Dam	Fill Mead first-restore Glen Canyon-which is a National Treasureâ€" and one of a kind.		Jessa TeWalt
20483	1	ALTONEDAM - Alternatives - One Dam	Please consider a full bypass of the Glenn Canyon Dam so that there is flexibility to manage the river in a way that allows Americans to enjoy and explore a canyon that could have been made a national park while also allowing water to flow freely to Mead should water levels fall below the minimum power pool.		Chad Nelson
20490	29	ALTONEDAM - Alternatives - One Dam	Evaluate options such as fill Lake Powell first, fill Lake Mead first, or variations on those themes, to explore and fully disclose differential impacts on all stakeholders.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20496	2	ALTONEDAM - Alternatives - One Dam	The EIS should analyze a 'Fill Mead First model. By prioritizing water storage in Mead before Powell, many of the culturally, historically, and scientifically significant areas remerging in Glen Canyons tributaries can be preserved. This would be further ensured with the policy of 'dont fill past 3,550 at Lake Powell reservoir.		Morgan Sjogren
20496	7	ALTONEDAM - Alternatives - One Dam	A drastic cut in state water usage to align with the actual and projected forecast of Colorado River water in times of drought must be implemented at all times. The water from an above-average winter should create a surplus in and stabilize one major reservoir, Lake Mead, as is the case in a 'Fill Mead First plan.		Morgan Sjogren
20496	8	ALTONEDAM - Alternatives - One Dam	The EIS should analyze the full bypass of Glen Canyon Dam. In 2022 Lake Powell and Lake Mead both fell to dangerously low water levels in the last few years, threatening the electrical grids that rely on the power they produce for millions of people. More disconcerting is the threat this poses to each dams ability to release water downstream at all. Why strain the entire Colorado River system to hang on by a thread to limp both reservoirs along? It is well known that Glen Canyon Dam and Lake Powell were created to retain sediment to protect Lake Mead. Glen Canyon Dam was built with a finite timeline and an understanding that the goal was to essentially 'Fill Mead First or more realistically, fill Mead longest. It is evident that the expiration date for both reservoirs is encroaching much faster than initially projected. (See study released in June 2023 here)		Morgan Sjogren
20496	9	ALTONEDAM - Alternatives - One Dam	Caring for the water and the land is not a separate issue from providing safe clean water to its citizens. Because of these short and long-term realities. A full bypass of Glen Canyon Dam will help restore and protect two unique ecosystems, Glen and Grand Canyon, that are unlike any other in the world. It will also ensure water can continue to pass through to Lake Mead, and steadily bolster its levels to protect the human animals that rely on this water. The reasons to bypass Glen Canyon Dam, to protect the water that all life in the Colorado River basin relies on, far outweigh the electricity the dam generates. Hydropower can be replaced by wind and solar. Life-sustaining water and the wonderous ecosystem it flows from are irreplaceable.		Morgan Sjogren
20516	1	ALTONEDAM - Alternatives - One Dam	I ask that you consider the 'fill Lake Mead firstÂ" model as we continue to adapt to an ever changing climate. The plan will not only strengthen the delivery of water to water users, but will also restore the now emerging environmental resource that is Glen Canyon. Reverting back to filling lake Powell for recreation after a large snow-year is a step in the wrong direction and goes against Reclamations mission of Â'managing, developing and protecting water in an environmentally and economically sound mannerÂ'.		Colin Chupik
20594	1	ALTONEDAM - Alternatives - One Dam	Please remove Glen Canyon and fill Lake Mead first!		James 'Q' Martin
20596	1	ALTONEDAM - Alternatives - One Dam	I would like to see the EIS include consideration of these side canyons and their recovering riparian systems. These canyons that have been "drowned" by Lake Powell are National Park quality terrain in their own right. The lower Lake Powell gets, the better and more spectacular canyons emerge. The EIS should consider a scenario where Lake Powell remains at a low level and the side canyons are permanently exposed and allowed to recover.		Steve Cole
20745	1	ALTONEDAM - Alternatives - One Dam	The EIS should analyze the full bypass of Glen Canyon Dam to preserve the option to operate the dam during persistent droughts.		George Lilly
20745	2	ALTONEDAM - Alternatives - One Dam	The EIS should acknowledge the extensive resources that have re-emerged in Glen Canyon. Glen Canyon is home to countless archaeological, geological, and ecological wonders. These priceless resources need to be considered when deciding where to store water. If it wasn't for the Glen Canyon Dam, I truly believe Glen Canyon would be a National Park.		George Lilly
20745	3	ALTONEDAM - Alternatives - One Dam	The EIS should analyze a 'Fill Mead FirstÂ" model, prioritizing water storage in Mead before Powell, including a 'donÂ't fill past 3,550Â" policy at Lake Powell reservoir.		George Lilly
20767	1	ALTONEDAM - Alternatives - One Dam	"In the years since Lake Powell reservoir has declined, we have seen an amazing reemergence of wonders like Cathedral in the Desert, Gregory Natural Bridge, as well as lush riparian ecosystems, and priceless archeological sites. The place known as 'AmericaÂ's lost National ParkÂ" is coming back to life, and the public is taking notice. Media outlets from around the world have flocked to witness Glen CanyonÂ's miraculous reemergence, sparking the imaginations of millions. When the dam was commissioned in 1956, there were no environmental laws to assess its impacts. Now that Glen Canyon has begun to reveal itself, the immense value of its resources needs to be accounted for as decision makers choose where to store water."		Sirovy, Tyler
20792	1	ALTONEDAM - Alternatives - One Dam	I would like to see higher sustained water levels in Lake Mead please.		Craig Forbus

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20873	2	ALTONEDAM - Alternatives - One Dam	The EIS should acknowledge the extensive resources that have developed or emerged in Glen Canyon during low water levels. In the years since Lake Powell reservoir has declined, we have seen an amazing reemergence of geologic wonders like Cathedral in the Desert, Gregory Natural Bridge, as well as, lush riparian ecosystems that host diverse wildlife, and priceless archeological sites dating back thousands of years that are the very ancestry of the desertÂ's current inhabitants		Kael Van Buskirk
20899	17	ALTONEDAM - Alternatives - One Dam	Reclamation should analyze: 1. One-Dam Solution Alternative A similar alternative was originally submitted during scoping for the Shortage Criteria EIS of 2005 and called The One-Dam Solution includes: * Reducing the use of inefficient above-ground water storage facilities, while expanding the use of underground storage to minimize evaporation losses. Regional aquifers could provide greater storage capacity than Lake Powell and Lake Mead combined. * Employ Lake Mead as the principal water storage and distribution facility for water delivery to the lower basin states. Lake Powell storage is resulting in unnecessary evaporative losses to a limited water supply. * Employ Lake Mead as the starting point for transporting sediment around the lower Colorado River system.4 As system crisis is imminent and remedies are urgently needed, this proposed alternative addresses critical issues that must be considered in the DEIS: * The legal structure in the CRB simultaneously creates solutions and looming problems. * Though the legal structure is based on priority, the critical needs of the natural environment are displaced, as are the needs of the First Nations and equity in fulfilling reserved water rights. * Additionally, the infrastructure that was built for solutions also caused looming problems. Therefore, past generations received the benefits at reasonable costs --while future generations will inherit the inequities and looming problems and at greater costs. The DEIS must consider an alternative that is more equitable and provides long-term solutions for future generations.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	18	ALTONEDAM - Alternatives - One Dam	Glen Canyon Bypass Alternative and Decommissioning and Mitigations Alternative Ongoing and anticipated future climate warming, regional aridification, and Colorado River flow declines require a plan from Reclamation for dead pool conditions at Lake Powell, and Glen Canyon Dam obsolescence, during the horizon of this planning process. The Bureau must plan now for decommissioning Glen Canyon Dam and analyze a range of corresponding engineering alternatives for doing so. The Bureau must ensure that all engineering alternatives for decommissioning Glen Canyon Dam are designed to prevent passage of non-native fish into the Colorado River in Grand Canyon National Park. The Bureau should, therefore, analyze an alternative or alternatives that (1) accept and plan for the inevitable obsolescence of Glen Canyon Dam and the end of hydropower production therefrom, (2) provide engineering solutions to manage and/or decommission Glen Canyon Dam as run of the river, such as and including bypass, and that (3) provide protections and barriers that prevent nonnative fish from entering Grand Canyon from upstream and impacting endangered fish downstream. Reclamation must analyze a range of design alternatives for preventing passage of non-native fish into the Colorado River in Grand Canyon. Reclamation should analyze bypass / nonnative fish barrier alternatives in the NEPA process, as emergency mitigation for Grand Canyon's endangered fish in the event of dead pool, and as a long-term management and engineering solution for the climate-inevitable obsolescence and decommissioning of Glen Canyon Dam.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	37	ALTONEDAM - Alternatives - One Dam	ADDRESS THE INEVITABLE FAILURES IN INFRASTRUCTURE The academic community recognizes that 20th Century Infrastructure likely won't serve its intended purposes by the end of the 21st Century. Reclamation must consider these realities in the DEIS, demonstrating to the public that we are preparing for a future with fewer reservoirs and hydropower units. It is refreshing to see scholarship that iterates what certain NGOs have been saying for decades. Now, Reclamation must follow suit, accepting those potential outcomes and including alternatives in the DEIS that reflect the likelihood of events Americans may soon face. Wheeler et al (2021) explained that combined storage in Lake Mead and Lake Powell will rarely exceed 50% of capacity -- which will create a scenario that forces society to choose between protecting the natural environment or continuing to generate hydro- power at certain facilities.13 Reclamation must address this reality in the DEIS and consider significant reductions in hydropower in the alternatives. Schmidt et al (2023) further explain that declining natural run off and "increasing evapotranspiration and dry soils associated with global climate change" mean it is highly likely there will be far less water to be stored in the basin in the future. As a result: "To stabilize reservoir storage, basin-wide use needs to equal modern runoff. To recover reservoir storage, basin-wide use needs to decline even more. Based on 21st century average runoff, a 13%-20% decline in basin-wide use would allow for stabilization and some reservoir storage recovery. Future policy debate about reservoir operations will inevitably concern whether most, or all, reservoir storage should be in Lake Mead or in Lake Powell. The choice of one or the other will result in significantly different environmental and recreational outcomes for Glen Canyon and the Grand Canyon." 14 Reclamation can no longer pan as taboo or radical a reservoir management system that entirely abandons reservoir storage in Lake Powell. It is in the mainstream channels of academic research, scholarship and discourse.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	8	ALTONEDAM - Alternatives - One Dam	Past proposals by environmental groups to decommission Glen Canyon Dam or to operate the reservoir without power production as a primary goal can no longer be ignored and must be seriously considered in the EIS. The evaporative losses occurring in Lake Powell are significant given the demands on the Colorado River system and must be taken into account. At a minimum, the dam should be operated to allow for the passage of 75,000,000 acre-feet for any period of ten consecutive years and one half the supply provided to Mexico as required under the 1922 Compact. The EIS should consider the need to retrofit the dam to adhere to this requirement.		Craig Morgan; Mike Abatti; James Abatti

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20913	3	ALTONEDAM - Alternatives - One Dam	An analysis8 released by Glen Canyon Institute, Utah Rivers Council, and Great Basin Water Network shows that if the Colorado River system experienced a series of water years like 2000-2004 or even 2017-2021, Lake Powell could drop within the range of deadpool elevation. The big water year of 2023 has avoided that outcome (for now), but the buffer could very well be temporary. Managing Lake Powell near deadpool comes with a host of challenges, many of which have been identified by Reclamation. These challenges include structural challenges of operating Glen Canyon Dam solely with the use of the river outlet works, managing recreation and safety at a wildly fluctuating reservoir, and serious impacts to the environmental resources, including endangered fish species in the Grand Canyon downstream. But the most important consideration is that at elevation 3,430 feet above sea level, Glen Canyon Dam cannot release enough water to meet its downstream delivery obligations to the Lower Basin9. Meeting that delivery obligation is one of the main reasons Glen Canyon Dam was built in the first place. For these reasons, it's imperative that the Post-2026 Operational Guidelines EIS include an alternative where Glen Canyon dam is re-engineered so that it can be operated as a "run of river" facility, allowing for the full downstream release capabilities at any elevation. While this concept is controversial to some, it will provide the greatest flexibility with the lowest compact requirement risk option under future hydrologic circumstances. To not include such an alternative for analysis would be a major flaw in an EIS meant to carry the basin decades into a drier future and ignore potentially devastating impacts to the Grand Canyon National Park ecosystem and downstream resources. The "run of river" alternative should include an in-depth analysis of the many considerations that that type of management regime would entail, including but not limited to: - Engineering costs and timeline - Policy framework options for Upper Basin water storage--including rethinking downstream delivery obligations past Lee Ferry and the ability of Upper Basin States' potential to store water in Lake Mead in the form of Intentionally Created Storage. - Potential water savings from reduced ground seepage and evaporation - Recreational opportunities and impacts in Glen Canyon and Grand Canyon - Environmental impacts and benefits in Glen Canyon and Grand Canyon - Use of Glen Canyon Dam facilities for flood protection - Implications for the thirty Colorado River Basin Tribes - Impacts and implications to meeting the requirements of the 1944 Treaty regarding the Colorado River supply to the Republic of Mexico. - Cultural resources emerging in restoring sections of Glen Canyon that were once inundated by the reservoir. It is imperative that the engineering costs and timeline allow for the retrofitting of the hydropower turbines via either full bypass or another engineering solution. The forthcoming water delivery crisis because of the outdated design inside Glen Canyon Dam will prevent the full delivery of Compact water downstream if/when Lake Powell levels drop in the future. The Department of Interior still has time to address this looming crisis, but time is quickly running out.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	7	ALTONEDAM - Alternatives - One Dam	The need to study full bypass of Glen Canyon Dam and model operations with low and no reservoir scenarios at Lake Powell As demonstrated by the charts above and acknowledging Reclamations' own 5-year projections24, there is a significant enough likelihood of Powell dropping below power pool and near deadpool that Reclamation should have every operational tool available to manage the system in low system hydrologic scenarios. Currently those tools are unavailable, because of infrastructure limitations at Glen Canyon Dam, and the lack of predictive modeling utilizing alternative scenarios where Lake Powell is hydrologically drawn down to low levels or run-of-river level. In an announcement on August 16th, 202225, Reclamation outlined a number of actions it would take to address falling levels at Lake Powell. One of these actions states Reclamation will, "Take administrative actions needed to authorize a reduction of Glen Canyon Dam releases below 7 million acre-feet per year, if needed, to protect critical infrastructure at Glen Canyon Dam." This action highlights one of the structural limitations at Glen Canyon Dam, specifically its ability to operate and move water downstream to the Lower Basin States and Mexico solely through use of the river outlet works for months or years at a time. Tanya Trujillo, former Assistant Secretary for Water and Science, in an announcement stated, "Glen Canyon Dam was not envisioned to operate solely through the outlet works for an extended period of time and operating at this low lake level increases risks to water delivery and potential adverse impacts to downstream resources and infrastructure." It's unclear that the physical structure of the river outlet works are capable of safely operating at full capacity for long periods of time. The recent strategy from Reclamation26 is centered around propping up Lake Powell enough to meet legal requirements through increased releases from upstream reservoirs, and reduction of releases downstream. These efforts will only work in the short-term and don't address the important structural problem of Glen Canyon Dam's inability to meet legal delivery requirements downstream.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	16	ALTONEDAM - Alternatives - One Dam	A 2023 paper by Schmidt, Yackulic, and Kuhn45 highlights the potential benefits of fully bypassing Glen Canyon Dam, stating: "Another option for reservoir management is to entirely abandon reservoir storage in Lake Powell by drilling river-level diversion tunnels around Glen Canyon Dam. Diversion tunnels could be designed with emergency valves that could be closed in the unlikely event that large runoff filled Lake Mead and storage in Lake Powell was needed. Such an action would restore a natural stream flow and sediment regime to the Grand Canyon and might benefit some pre-dam elements of the Colorado River ecosystem, although there would likely be a multi-decadal period of ecosystem adjustment to the new flow and sediment conditions." The paper highlights the potential benefits to native fish species, several of which are endangered, as well as a possible solution to the growing threat of nonnative fish in the Grand Canyon. "This management option would also lead to increases in water temperature and changes in the fish community, including elimination of the nonnative, tailwater trout fishery. Such a strategy would increase turbidity and favor some nonnative fish species like carp and channel catfish over other nonnative fish species such as smallmouth bass. Carp and channel catfish coexisted with native fish species in the Grand Canyon for decades prior to construction of Glen Canyon Dam (Mueller & Marsh, 2002) and may represent a lesser threat to the continued persistence of native fish species than do smallmouth bass." In order to have an informed discussion among Basin stakeholders, it's imperative to understand the benefits and tradeoffs of potentially phasing out Lake Powell entirely.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	33	ALTONEDAM - Alternatives - One Dam	9. The need to study operational alternatives that include reservoir consolidation and prioritization of Lake Mead Many leading scientists and policy experts along the Colorado River have advocated for a management approach where Lake Powell and Mead are viewed as one unit of water storage, rather than two separate storage facilities81. Some experts have even made the point that since Upper Basin users don't actually pull water from the reservoir, it is effectively a Lower Basin reservoir. Given the reality that Lake Powell narrowly avoided dipping below minimum power pool last year, and Reclamation is currently assessing re-engineering the dam to operate below deadpool, and a tremendous amount of emerged resources exist in Glen Canyon below its full pool elevation, the Post-2026 EIS should model alternatives where Lake Powell is operated at low or even run-of-river levels. These alternatives should include reservoir consolidation, and prioritization of Lake Mead as the Colorado River's primary storage facility. The scenarios modeled should include a rule that utilizes Lake Powell as a backup facility, not to be filled past 3,550 except for emergency situations. From a perspective of maximizing water supply, the two-reservoir concept might have made sense in the 1956 Colorado River Storage Project Act and again in the 1968 Colorado River Basin Act. The underlying assumption was that the system would be operated and managed at a near full level. The realities of climate change and the impacts it is having on basin hydrology now requires us to assess those assumptions of the original basin development and determine if they are still valid for looking forward. The Federal government is supposed to be forward looking for its citizens and this is an opportunity to do that.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20916	2	ALTONEDAM - Alternatives - One Dam	Analyze the full bypass of Glen Canyon dam, allowing water and sediment to pass into the Grand Canyon and prevent the ongoing sedimentation of Glen Canyon under Lake Powell. This also gives the river, users, and water managers more flexibility in addressing the impacts and variability of climate change.		Travis Custer
20916	5	ALTONEDAM - Alternatives - One Dam	The EIS should explore and promote a fill Mead First model to continue to protect water resources for the basins while allowing ecological recovery of sensitive areas like Glen Canyon.		Travis Custer
20937	1	ALTONEDAM - Alternatives - One Dam	This has drawn me to the greater Glen Canyon area on multiple occasions. Exploring the side canyons of Glen Canyon and seeing the water line from years ago towering far above is a wild experience...I would like to see the lake completely drained and the gangly marinas gone with it. However, I believe a compromise could be struck. Create a new max height for the reservoir below 3500 ft. Any extra water can be sent down and held in Mead. I understand this will lower the hydroelectric potential for the Dam and thus profits. Yes, less money is bad for the suit's bottom line, but the benefits this will have are huge. Boaters, anglers, and vacationers will still have a lake in the desert to enjoy. Hikers, rafters, and wilderness lovers will have most of the divine side canyons. More importantly, the riparian ecosystem and oases in the deserts will be able to restore themselves.		Braxton A.
20941	1	ALTONEDAM - Alternatives - One Dam	- The EIS should recognize the natural resource which have emerged in Glen Canyon with the decline of water levels in Lake Powell reservoir - The EIS should include an analysis of a complete bypass of Glen Canyon Dam - The EIS should consider a "Fill Mead First" model (prioritizing filling Mead before Powell) which includes a "don't fill past 3,550" policy at Powell		Jared Kellerer
20947	6	ALTONEDAM - Alternatives - One Dam	As part of the dam modification effort and as part of this process, an alternative to fully drain Glen Canyon Dam and restore Glen Canyon should be considered and fully analyzed.	American Whitewater	Kestrel Kunz
20951	1	ALTONEDAM - Alternatives - One Dam	As we grapple with the effects of climate change, it becomes increasingly clear that we must take a close look at the viability of a full bypass for the Glen Canyon Dam. With the evolving crisis of climate change, the once-considered asset of the dam could be inadvertently obstructing vital downstream water movement. Delving into the potential of a complete bypass of the dam underscores what should be the Bureau of Reclamation's commitment to adaptability, understanding of the current and future climate, and desire to best manage our limited natural resources in the face of these changing times.		Cole Melanson

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20951	2	ALTONEDAM - Alternatives - One Dam	If a full bypass of Glen Canyon Dam is not prudent, the "Fill Mead First" model should be considered next. While contemplating the "Fill Mead First" model, which proposes prioritizing Lake Mead over Lake Powell and implementing a prudent cap on the latter's filling, we should consider the realities of the past several decades. The limited water availability in the Colorado River's watersheds and mainstem reservoirs challenges the logic of inundating Glen Canyon's pristine canyons if we're unable to adequately fill either reservoir. This prudent approach aligns with our commitment to making decisions grounded in sound judgment and long-term sustainability.		Cole Melanson
20951	3	ALTONEDAM - Alternatives - One Dam	Equally noteworthy is the remarkable resurgence of nature within Glen Canyon. The years following the decline of the Lake Powell reservoir have borne witness to the reemergence of remarkable natural wonders, such as the Cathedral in the Desert and the Gregory Natural Bridge, each a testament to the power of restoration. Additionally, the return of vibrant riparian ecosystems and invaluable archaeological sites underscores the true wealth of resources beyond those of a dam that deserve due consideration as we chart our path forward in water storage decisions.		Cole Melanson
20953	3	ALTONEDAM - Alternatives - One Dam	The plan of action that makes the most sense is the full decommission of the Glen Canyon Dam. Not only would this plan restore the incredibly diverse and beautiful ecosystems that were drowned as the reservoir filled behind Glen Canyon Dam, it would also provide more water to fill Lake Mead, which has been in steady decline for over 23 years. We cannot continue to treat this system as viable when it takes extraordinary conditions to maintain it. Please consider decommissioning the Glen Canyon Dam. It is the best way to protect the land we live on, to provide for future generations, and to restore a once-beautiful natural landscape.		Jessica Shoeneman
20954	1	ALTONEDAM - Alternatives - One Dam	Please let Glen Canyon recover like itÂ's doing over the last dozen years. I donÂ't believe damming these rivers is the right way but they are built. Fill Lake Mead first and keep Powell no higher than 3,550 inches.		Mark Aller

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20957	9	ALTONEDAM - Alternatives - One Dam	BOR must plan for dam modifications now, before we are in an emergency situation. We now understand that climate can cause reservoir levels to fluctuate beyond the levels anticipated at the time of dam construction. Significantly, a report by the National Research Council (NRC) that studied the Colorado River's flow over the last several hundred years with tree ring data has found that previous droughts were longer and more severe than anything in the historical record.23 Current and future droughts will become longer and more intense because of a regional warming trend, and more challenging for native species to survive.24 The NRC report also stated that "the preponderance of scientific evidence suggests that warmer future temperatures will reduce future Colorado River streamflow and water supplies. Reduced streamflow would also contribute to increasing severity, frequency, and duration of future droughts."25 The BOR was one of the sponsors of this study. The SEIS must specifically create a plan for providing water to the Colorado River in Grand Canyon during extended drought periods. The water must be of sufficient quality and appropriate temperature to protect Grand Canyon's native species, and delivered in such a manner as to protect the CRE in Grand Canyon. To insure against the loss of a flowing river through Grand Canyon, BOR must create a plan for releasing water through Glen Canyon Dam if levels fall below the dam's intakes. BOR must include in its disclosure predictions for what the water quality and temperature will be when reservoir levels drop. In this regard, BOR should consider an alternative including dam modifications such as bypass tubes at or near the base of the dam, to enable flows when the reservoir level falls below dead pool. These tubes might pass through the dam or they might pass through the sandstone walls surrounding the dam. BOR must start planning now because we know that bypass development will take years to achieve. [see letter attachment for list of references] As recent projections indicate, minimum power pool appears imminent and was narrowly avoided this year.26 If we are interpreting the graphs correctly, BOR predictions of reservoir end of month elevations have overestimated observed annual means for some portion of the year in at least 15 out of the past 32 years, though BOR asserts, "The Probable Minimum inflow scenario reflects a dry hydrologic condition which statistically would be exceeded 90% of the time."27 We recognize that long range hydrologic predictions are extremely difficult, but whether BOR's 24-month Lake Powell End of Month Elevations are correct or not, we must prepare for crisis.28 It is time to speak frankly - and urgently - about the problem that BOR may have moving water through Grand Canyon in the very near future. If Powell reservoir drops another 50-60 feet beyond minimum power pool, the Upper Basin will be unable to deliver water to the Lower Basin and Mexico as required by the Colorado River Compact, and if the reservoir drops 120 feet below minimum power pool, we will be in a deadpool situation.29 The Bureau should consider at what point river management -- specifically, water and power needs -- would be better served by maximizing water storage in Lake Mead rather than dividing it between the Mead and Powell reservoirs. The Bureau should assess the comparative loss of water from bank storage and evaporation between maintaining both reservoirs, maintaining only Lake Mead, and an alternative where Lake Powell is kept low to reduce losses to infiltration and evaporation. Hydropower needs may be more secure if water is concentrated above Hoover Dam, where it will have a higher hydraulic head. Installing river outlets low on Glen Canyon Dam would enable BOR to keep Powell reservoir low without risking the inability to pass water through Glen Canyon Dam. BOR should also consult with entities on the Navajo Nation who are planning solar energy projects adjacent to existing power lines and in already disturbed areas to determine what the electric capacity of those projects will be, and whether they might serve to replace hydropower losses, especially those with storage components. Because Powell reservoir is likely to fluctuate around its current level into the future, continuing the risk of allowing more warm water non-native fish in Grand Canyon, BOR should also examine the potential for other dam modifications that will limit fish passage through the dam. One possibility is upstream screening. Because it will take some time to analyze the feasibility of this action, BOR should begin to study it now. [see letter attachment for list of references] Recommendation: As part of this process, BOR must immediately begin to plan a way to move water around the dam at the base of Glen Canyon Dam. This will: 1) maintain flow through Grand Canyon and enable reliable water deliveries by eliminating the possibility of reaching dead pool, 2) enable water to be concentrated above Hoover Dam while maintaining the flexibility to move water downstream from a low Powell reservoir, and 3) allow cold water to be released from the deepest part of the reservoir, even when reservoir levels are low. Recommendation: Assess the comparative loss of water from bank storage and evaporation between maintaining both reservoirs, maintaining only Lake Mead, and an alternative where Lake Powell is kept low to reduce losses to infiltration and evaporation.	Sierra Club Grand Canyon	Alicyn Gitlin
20960	1	ALTONEDAM - Alternatives - One Dam	The priority should be to eliminate the Glen Canyon Dam and fill lake Mead. Lake Mead is the more important for reservoir so it should get priority. Glen Canyon Dam flooded Glen Canyon causing one of the biggest ecological disasters in US history, now we have a chance to right that wrong and bring Glen Canyon back to its former glory.		Olin Speare
20961	1	ALTONEDAM - Alternatives - One Dam	The Glen Canyon EIS should take into account the extensive resources re-emerging in glen canyon, both ecological, cultural, and recreational. In order to protect these resources for future generations, the EIS should consider the full bypass of the Glen Canyon Dam and a â€œfill lake Mead firstâ€ approach.		Hank Peters

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20964	1	ALTONEDAM - Alternatives - One Dam	With the undeniable effects of climate change, high heat and low levels of precipitation, there is no longer time to ponder how to change - we have to take action immediately. You have that opportunity right now to make drastic, positive changes in the management of one of the most precious and necessary sources of water in the U.S. We absolutely cannot rely on miracle snow years like the 22-23 season. We have to take responsibility. When there is not enough water to fill both Lake Powell and Lake Mead, we should consider prioritizing Lake Mead and allowing Glen Canyon to return to more of its natural state: The EIS should analyze the full bypass of Glen Canyon Dam. As climate change continues to reduce flows on the river, the dam becomes more of a liability preventing water from flowing downstream. Analyzing the full bypass of the dam would give the river, its users, and its ecosystem the most flexibility and adaptability in a drier future.		Kate Foley
20971	1	ALTONEDAM - Alternatives - One Dam	Please consider analyzing the full bypass of the dam, the resources that have emerged from with the canyon as a result of lowering water levels (which are attracting national attention), and prioritizing filling Lake Mead before Lake Powell. It is becoming increasingly impossible to maintain high water levels in both, so why not focus on Mead and allow the resources that have emerged in Glen Canyon to remain. We are headed towards a drier future and should be prepared for when that emerges, rather than caught on our heels.		Lee Moriarty
20980	1	ALTONEDAM - Alternatives - One Dam	I strongly urge the EIS to analyze the full bypass of the Glen Canyon Dam. As we've seen from previous years, when water levels reach critical levels, the dam actually becomes a liability that prevents water from flowing downstream. Aside from a historic snow year in 2022-2023, we need to recognize that we can't depend on precipitation to maintain the levels of Lake Powell. Even Floyd Dominy has recognized the issue with the dam and has sketched out a means of bypassing the dam.		Ryan Schuster
20980	2	ALTONEDAM - Alternatives - One Dam	With this, I support filling Lake Mead first. Knowing that we don't have enough water to fill both reservoirs, Mead should be prioritized to fill. Glen Canyon has the potential to be restored. Partially filling this lake is spreading our water resources thinner, and ultimately is resulting in two half-baked reservoirs. We can develop a win-win solution by filling Lake Mead and keeping Lake Powell enough 3550 in order to develop riparian ecosystems and access to numerous natural wonders within the canyon.		Ryan Schuster
20992	1	ALTONEDAM - Alternatives - One Dam	As you know, the Colorado River Basin in in crisis. I support the "Grand Canyon Restoration Alternative" as set forth in Save the Colorado's comments on this same process. This alternative accounts for the inevitable effects of climate change in a way that is ecologically feasible.		Matthew Kirsch
21013	1	ALTONEDAM - Alternatives - One Dam	* Analyze the full bypass of Glen Canyon Dam to account for increasing risk of complete flow stoppage in case of reduced river flows, * Account for and acknowledge the vast, invaluable and unique natural resources and ecosystems that have been able to stage a recovery while water levels in Lake Powell reached record lows; and * Conduct analysis on a "Fill Mead First" model including a 'donÂ't fill past 3,550Â" policy at Lake Powell reservoir that would allow for the natural wonders of Glen Canyon to emerge permanently from the soupy, depressing storage tank where they are currently condemned. Glen Canyon is a stunning part of the world and the truly immeasurable value of its natural beauty should be a key decision-making factor as you plan for the future of the river. I hope in my lifetime (as a 30-something) to see this environmental wrong righted and Glen Canyon brought back to life and protected like similarly wondrous natural areas in the desert Southwest. Please do the right thing.		Heidi Obermeyer
21046	1	ALTONEDAM - Alternatives - One Dam	The EIS should analyze the larger impact fully of bypassing lake Powell without the consideration for strictly local economic affect. Lake Powell is unsuitable for sustainable water storage due to the vast distance it covers with shallow water susceptible to extreme evaporation rates. The sandstone bed also contributed to an even greater rate of loss due to its porous nature.		Adam Smith
21060	1	ALTONEDAM - Alternatives - One Dam	I am writing to submit a comment on the Post-2026 Colorado River operational plan. Specifically I am writing to express support for restoring Glen Canyon and draining Lake Powell. It's become clear that using the canyon for storage is unnecessary with Mead also at such low levels downstream, and the recreational opportunities, natural environment, and conservation interests greatly outweigh the wasteful recreational uses of Lake Powell, which largely exacerbate the causes of climate change. There is no reason not to protect Glen Canyon as we have seen it flourish in the past few years.		Morgan Stanley
21081	11	ALTONEDAM - Alternatives - One Dam	Analyze the full bypass of Glen Canyon Dam and the re-emerging natural resources As both Lake Powell and Lake Mead sit below 35% full, it becomes critical to consider decommissioning Powell and storing water in Lake Mead. Scientists at UCLA estimated that from 2000 to 2021, rising temperatures led to the loss of about 32.5 million acre-feet of water in the Colorado River Basin, more than the entire storage capacity of Lake Mead, the country's largest reservoir. Given evaporation and critical natural and cultural resources within Glen Canyon, it is critical to put resources into analyzing the full bypass of Glen Canyon Dam.	Dolores River Boating Advocates	Rica Fulton

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21132	1	ALTONEDAM - Alternatives - One Dam	I believe the future of Glen Canyon will affect everyone in the upper and lower Colorado River basin. This EIS is vital to it's future, so I want to thank the Bureau for this opportunity. I believe that the best path forward for Lake Powell and the upper River basin is a full bypass of Glen Canyon Dam. Even after an unprecedented water year, Lake Powell sits at around 38% of capacity. With Lake Mead down river at around 33% of capacity, Lake Powell is not sustainable or needed in terms of water storage. If the Bureau would implement a full bypass of Glen Canyon right now, Lake Mead would be at around 77% of capacity (this is not including water loss). These numbers further show that Lake Powell is doing nothing in terms of water storage.		Magnus Tveit
21155	5	ALTONEDAM - Alternatives - One Dam	5. Assess the feasibility of the "Fill First" model, and to prioritize Lake Mead if there is not enough water to fill both lakes.		Dylan Mori
21157	1	ALTONEDAM - Alternatives - One Dam	The next EIS should look at bypassing Glen Canyon Dam and no longer using Lake Powell as a storage for water. And the EIS should look at the "Fill Mead First" option, putting as much water in Mead as possible and keeping Glen Canyon free of stored water and allow the Colorado River to flow free and wild through Glen Canyon.		Sam Carter
21163	2	ALTONEDAM - Alternatives - One Dam	5. Assess the feasibility of the "Fill Mead First" model. Simply put, if there is not enough water to fill both Lake Powell and Lake Mead it makes more sense to fill Lake Mead first. This option may not be an immediate possibility but the BOR should put in a reasonable effort to assess its feasibility for the future		Madeline Cronin
21167	4	ALTONEDAM - Alternatives - One Dam	5. Assess the feasibility of the "Fill Mead First" model. Simply put, if there is not enough water to fill both Lake Powell and Lake Mead it makes more sense to fill Lake Mead first. This option may not be an immediate possibility but the BOR should put in a reasonable effort to assess its feasibility for the future.		Teal Lehto
21168	2	ALTONEDAM - Alternatives - One Dam	The EIS should consider a scenario where Lake Powell remains at a low level and the side canyons are permanently exposed and allowed to recover.		Steve Cole
Form 5	-	ALTOPS - Alternatives - Operations	4. Letting 10% of the rivers total water flow into and through its Delta to the Sea of Cortez in Mexico to sequester carbon in Delta wetlands and mangroves and restore the wildlife habitat.	Save the Colorado	
Form 5	-	ALTOPS - Alternatives - Operations	6. Distributing water allocations to all users based on the percentage of total flow available each year, not a fixed amount.	Save the Colorado	
6	1	ALTOPS - Alternatives - Operations	I've always had this pet peeve of the reason that the Lake Powell and Lake Mead were different operational periods. Leg me is on a calendar year base period, and Lake Powell is on the water year period. Obviously, the guidelines were to, because the elevations of like we're going down so like me has been harmed, in my opinion. If I've seen it significantly by this person. So say, for example, when Lake Powell goes into, I'm not on that cover first goes into a lower operating tear, and it's cutting releases to Lake Mead like me is still operating on the previous year's operation guidelines, and it not until January first of the next year, will it go into the other guidance, in other words would like me would like how having cut Or have cut water to leg me like me to still releasing water at higher levels. Because, of the new opera the new guidelines are new tiers don't take effect until January first. Why can we not be on the same operational period? in my opinion, would be the water year?	Western Area Power Administration	Xavier Gonzalez
10	1	ALTOPS - Alternatives - Operations	I really believe we need the ongoing operations of both the Glen Canyon Dam and the Hoover dam. because it's crucial for the conservation of water resources and ensuring their availability in years to come. Those graphs showed how we see years where there is excess, where there's not with these 2 infrastructures. They really play the significant role, not only in water management, but also energy production and the regional economies. We know that these dams have been huge for our conservation efforts as they facilitate the collection of storage of water. But this sort water also can be systematically released during the drier period as we've seen. So, while they've been really low, we're grateful. We have them because they're keeping us moving in these times of drought. Moreover, I just see how they provide water to millions of people across several states supporting. You know what we need in our homes as well as agriculture. and it helps us cultivate crops in the semi-arid regions that would be impossible otherwise I look at it from the energy perspective both of the dams contribute significantly to renewable energy mix by generating hydroelectric plow power. And as we're pushing more toward electric vehicles and more of the electrification, we need as much of that as we possibly can, because it reduces our reliance on fossil fuels and lowers our carbon footprint. And then, finally, both Glen Canyon humor dam are crucial components and really giving our regional economies a boost. They not only create jobs later, their maintenance and operations, but a thriving tourism industry for both of the locations. So, I just want to get on the record. You know. I believe the preservation and continuous operation of both the Glen Canyon and Hoover dam is crucial for our overall, sustainable future. and really see that they play a pivotal role in water conservation, renewable energy, generation, and economic sustainability.		Steven ZoBell

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18	1	ALTOPS - Alternatives - Operations	That's a question. but the comment in terms of the short term, anyway, probably the long term as well is, if there are modifications to operations related to releases from Glen Canyon Dam, or, for that matter, Hoover dam that there'd be greater flexibility than what was shown in the scoping meeting from earlier or the preliminary alternatives that were developed before the process was put on hold pending the 7 States Agreement, where I think it showed is a minimum of 6 million acre feet could be released in any given year as opposed to the current. I think something like 7 depending on the situation. I don't see the reason why you couldn't consider a more open-ended, flexible down to 5, say to account for certain situations that might not otherwise be covered. Or example, right now. There were extraordinary circumstances in the last couple of years that may have dictated an even lesser release than was actually the case in 2,021 and 2,022, and maybe this year, with things being up such as they were a little more flexibility, and the guidelines for releases as well. And then the other comments that would be I know this is the in the short term we're really just talking about if changes to use in the lower basin States.		John Rickenbach
30	1	ALTOPS - Alternatives - Operations	For a water year, apportion the previous year's flow, minus estimated evaporation from Lake Mead and Lake Powell, to 10% refilling the two reservoirs and 90% among the states and Mexico according to their fraction of the 16.5 million acre-feet per year. Don't pay California (mostly Imperial Valley) anything for "giving up" the difference between what they will get and their previously allotted 4.4 million acre-feet per year.		
30	3	ALTOPS - Alternatives - Operations	Here's my outrageous plan. As I understand it, a water level in Lake Mead of 1,025 feet above sea level triggers a situation in which the Secretary of the Interior decides who gets how much water. Keep enough water in Lake Roosevelt to make Lake Mead reach that level. Then the Secretary can apportion water according to needs.		
208	1	ALTOPS - Alternatives - Operations	**See Attachment to Letter #208 for full details of suggested alternative - this is the same individual that authored the Path to 3588. I am attaching a reasonable proposal that should be considered as a potential alternative in the EIS to be prepared for this process, which I'm calling The Way Forward: A Plan for Lake Powell and Lake Mead. It is based on the following key principles: 1. Water supply, power supply, recreational opportunities, and natural resources associated with the major reservoirs in the system must be maintained sustainably, since those resources are crucial to the health, safety and economy of the West. 2. Given the current drought and recent extremely low levels of Lake Powell and Lake Mead, any action under this plan needs to occur immediately and collaboratively for the plan to be most effective. 3. Any needed water use reductions to implement this plan must be shared fairly and equitably among all seven states that use the water, as well as Mexico. Tribal rights and water use must also be addressed in that framework and would also be subject to the same proportional reduction as needed. 4. Because the entire Colorado River water supply and power system does not work unless both Lake Powell and Lake Mead are viable actions to stabilize storage in both reservoirs need to be addressed simultaneously. One reservoir should not be prioritized over the other. 5. The plan must be flexible and recognize changing conditions over time. The magnitude and duration of possible water use reductions in the states are linked to the volume of water stored in Lake Powell and Lake Mead. Conceptually, if water volume in the reservoirs rises, water use reductions can ease. 6. It is recognized that any comprehensive solution to the complex challenges related to the use of the Colorado River cannot be solved unilaterally by The Bureau of Reclamation, and for that reason, this or any reasonable plan that goes beyond the limited mission of the Bureau must be considered in the NEPA process as well as any other related planning process. Dismissing any such plan for including aspects that are potentially outside a narrow purpose and need defined by the Bureau is unacceptable and short-sighted. The Bureau must work collaboratively with the states, tribes, Mexico, and other federal agencies, such as the National Park Service and US Fish and Wildlife Service, to implement those aspects of this plan that are beyond what can be accomplished by the Bureau alone.		John Rickenbach
319	1	ALTOPS - Alternatives - Operations	In the long run, I think Lake Powell and Lake Mead should have variable target levels that do not require immediate draining in record years and could be adjusted when years of high runoff are achieved.		Angie Simmons
494	8	ALTOPS - Alternatives - Operations	Water Resource Management: Adopting measures to reduce water outtake from Lake Powell is vital for better water resource management in the region.		Matthew Riddle
651	6	ALTOPS - Alternatives - Operations	It was mentioned in the webinar that one goal was to provide each state with an amount of water they could count upon each year to avoid fluctuations. That is an almost impossible number to provide them due to the variations in the snow pack and run off. High snow pack does not always result in high runoff especially after several dry years. I would have two suggestions on trying to achieve that goal. The first being, make a determination of a level that you are fairly certain the river can provide. 10 maf, 8 maf? Divide that up between the states based on the percentage they currently use. That would be a guaranteed amount every year. If the snow pack provided more runoff, the states would get more water.		Steve Davis
663	4	ALTOPS - Alternatives - Operations	For the lower basin, the prioritization of use of the water needs to be re-allocated to account for the increase in population in Nevada, and Arizona. Much of this population growth has come from California, so that state should not receive priority.		Neil Fischnaller

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12848	2	ALTOPS - Alternatives - Operations	As climate change continues to eat into streamflow of the Colorado River historical obligations of Upper Basin states to Lower Basin states and Mexico will become even more unattainable. Historical obligations need to be reassessed and changed to achievable and sustainable goals. Brad Udall recommended the following path forward in his presentation at the June Conference at CU Law School. * Decide on what future we need to plan for; e.g. how much total water should we plan for. * Remove 1.5 MAF of demand from the system to account for system losses in the Lower Basin * Reduce demand even further to increase reservoir storage - he recommended an additional 3 MAF of reduced demand for this purpose * Keep Upper Basin demands constant at existing levels * Decide how much water to allocate using the 5-year worst historical period and the 24 month evaluation using the worst 2-years instead of the 10% Minimum Probability test * Do away with actions that depend on 3,500 foot elevation in Powell and the 1,000 foot elevation in Mead * Since there is insufficient water to fill both Powell and Mead these reservoirs need to be managed as one reservoir.		Lisa Buchanan
12848	5	ALTOPS - Alternatives - Operations	IV Continue to Increase Conservation Measures in all Colorado River States Each state and nation in the river negotiations need to continue as well as increase water conservation measures. J.C. Schmidt, Yackulic, C.B., and Kuhn,E. in their WIREs Water (12 May, 2023) publication, "The Colorado River water crisis: Its origin and the future" state the following. * * "To stabilize reservoir storage, basin-wide use needs to equal modern runoff. . . . . Based on 21st century average runoff, a 13% to 20% decline in basin-wide use would allow for stabilization and some reservoir storage recovery." Schmidt etal, 2023 reported average annual natural flows in the Colorado river at Lees Ferry (2000 and 2022) of 12.5 MAF compared to average consumptive uses and losses of 15.1 MAF (2000 to 2020 noted in Table 1 of the report). Upper and Lower Basin states' and Mexico's consumptive uses between 2000 and 2020 average 4.58, 8.93, and 1.57 MAF, respectively. Based on these numbers, uses would need to be reduced by 17% of the 21st century use to equal average annual flows provided by the Colorado River in that period.		Lisa Buchanan
12848	8	ALTOPS - Alternatives - Operations	ritically the Lower Basin states have not negotiated a Lower Basin Compact. Without a compact: * the definition of consumptive use included in early contracts does not account for reservoir or system losses prior to diversion points. * Lower Basin state consumptive use allocations, of the total 8.5 MAF lower basin share of the Colorado River, have not been determined. * Lake Mead reservoir and river channel losses have not been addressed nor allotted to any entity in the lower basin. * There is no agreement on how water shortages will be shared * A consistent way of evaluating lake surface evaporation and system losses in the full Colorado River basin is lacking. In the initial 1930s contract between the BUR and California consumptive use was defined as diverted amount minus return flows. Contracts in the 1940s with Arizona and Nevada and the treaty with Mexico (1944) similarly did not account for losses. The United States absorbed all reservoir evaporation and transit losses from Hoover Dam in these negotiations. Though the BUR recognized that system losses and lake evaporation would need to be accounted for, it was assumed that the two main basins would address this issue - as has been done in the Upper but not the Lower Basin. If flows in the Colorado River had remained at 18.5 MAF per year, estimated by the BUR in the 1920s, the issue of losses would not be as critical as today with average natural inflows to Lake Mead in the 2000s equal to 13 MAF/year [total inflow including Upper Basin allocations]. At 13 MAF/year, "there is not enough river water to meet the needs of Arizona, California, and Nevada on the Lower River, [let alone] to meet the current and future aspirations of the Upper Division States, to address the unmet senior rights of the Basin's Native Americans, and to satisfy the 1944 Treaty obligations to Mexico (page 17)." To begin to stabilize the Lower Basin water supply the Lower Basin states need to reduce their collective use by, at a minimum, water losses in the Lower Basin or 1.5 MAF/year. These losses should be incorporated into consumptive use allocations for each state and entity. Disagreement over how to accomplish this has stalled progress. California supports the idea, to its benefit, that losses should be considered a reduction in supply and the remaining water distributed according to priority; basically out of Arizona's CAP allotment. Arizona, Nevada, and the Upper Basin states support the idea that losses should be allocated on a pro-rata basis to all water users commensurate with their use. This affects California the most as well as tribal and pre-compact rights in Arizona. It is imperative that the Lower Basin states as well as any affected tribal and non-tribal entities negotiate a path forward in a Lower Basin Compact Agreement.		Lisa Buchanan
16668	3	ALTOPS - Alternatives - Operations	Thank you for working diligently to develop an operational strategy for the Colorado River System that addresses the continued hydroelectric energy production, water delivery, and the financial and recreational opportunities that adequately a full Lake Mead and Lake Powell allow for.		Tina
16668	4	ALTOPS - Alternatives - Operations	Please develop an operational strategy for the Colorado River System that ensures that enough water ALWAYS remains in Lake Mead and Lake Powell to keep these reservoirs from ever coming close to dead pool. Keeping adequate water in Lake Mead and Lake Powell ensures that hydroelectric power will always be generated by Hoover Dam and Glen Canyon Dam. Keeping these great reservoirs above dead pool ensures that water will be able to be delivered to communities and farmlands that so depend on this water.		Tina
16688	1	ALTOPS - Alternatives - Operations	Please develop an operational strategy for the Colorado River System that ensures that enough water ALWAYS remains in Lake Mead and Lake Powell to keep these reservoirs from ever coming close to dead pool. Keeping adequate water in Lake Mead and Lake Powell ensures that hydroelectric power will always be generated by Hoover Dam and Glen Canyon Dam. Keeping these great reservoirs above dead pool ensures that water will be able to be delivered to communities and farmlands that so depend on this water.		Edward Timmons

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16688	4	ALTOPS - Alternatives - Operations	Thank you for working diligently to develop an operational strategy for the Colorado River System that addresses the continued hydroelectric energy production, water delivery, and the financial and recreational opportunities that adequately full Lake Mead and Lake Powell allow for.		Edward Timmons
16804	9	ALTOPS - Alternatives - Operations	The Post 2026 Guidelines should reconsider the criteria for determining when and where policy actions are implemented. Currently, actions designed to respond to shortage, such as tiered delivery reductions, are implemented when Lake Mead's elevation reaches pre-determined levels. However, reservoir storage and lake elevation respond fairly slowly to reduced streamflow and are not proactively adaptable to changing climatic conditions6. Instead, alternate "triggers" for policy action, such as a 5- 10 year rolling average of streamflow, should be evaluated in the Post 2026 Guidelines process to assess their responsiveness to short-term hydrologic changes while protecting against overresponse, which could occur within a single low-flow year if the basin was managed as a "run of the river" system in the long term.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16804	11	ALTOPS - Alternatives - Operations	Thinking about the basin more holistically may also have practical implications for the operation of reservoirs. While various campaigns have called for the decommissioning of one of the major system reservoirs, several arguments against this - including an overall reduction in water storage - exist. However, the Post 2026 Guidelines could move away from a mindset where Lakes Powell and Mead are considered the Upper Basin's and Lower Basin's storage "buckets," respectively, and instead focus on optimizing total system storage to meet more user needs flexibly and under dynamic conditions. This reconceptualization might include evaluating the impacts of policies that focus less on "balancing" the major system reservoirs and are more akin to the Upper Basin's Drought Response Operations Agreement, including plans for refilling all operating reservoirs.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16904	4	ALTOPS - Alternatives - Operations	A brief historical summary of releases from Glen Canyon Dam whereby the impact on recreational use and aquatic ecology of the river corridor was deemed irrelevant would be helpful for the public to understand the Bureau's mindset of operating Glen Canyon Dam. Flows would be reduced to a minimum during off-peak hours and maximized during on-peak hours. These swings in flows were later reduced to what they are now. This summary should be contrasted with any proposed flow reductions for post 2026 operations and the impact on recreational use and aquatic ecology quantified.	Grand Canyon Private Boaters' Association	john vrymoed
16940	4	ALTOPS - Alternatives - Operations	USBR must divide the water in the river, on an average yearly basis, by distributing it out to water users based on percentages, not absolute amounts. The percentages shall be equitably distributed such that current users receive amounts of water equally proportional to their current diversion amounts.		Jed Koller
17241	2	ALTOPS - Alternatives - Operations	2. The stability of the Colorado River water supply is of paramount importance, both to water users who value certainty and to the environment, which depends on the political will of decision-makers who will be challenged to prioritize environmental resources in times of water supply crises. Reclamation's metrics for the Colorado River water supply should prioritize system stability over maximizing deliveries to water users.	National Audubon Society	Jennifer Pitt
20221	2	ALTOPS - Alternatives - Operations	The dams of the Colorado River system serve a vital purpose of storing water for years of drought, and generating hydropower. Obviously the minimum viable levels for power generation should be protected, for the benefit of all states.		Ken Jensen
20341	21	ALTOPS - Alternatives - Operations	* Evaluation of different tiers of curtailment, instead of only analyzing either a full curtailment or a no-action alternative. A less polemic range of alternatives is warranted to enable Reclamation, decision makers, and the public to understand whether different curtailment percentages result in a linear one-to-one reduction in impacts, or if there is a curtailment volume that delivers fewer impacts but only marginal reductions in water as compared to a full curtailment.	Imperial Irrigation District	Shields, Tina L
20417	21	ALTOPS - Alternatives - Operations	e. Moving away from a strict tiered approach to operations The current tiered approach to reservoir operation releases and accounting for associated Lower Basin shortages is not only less responsive to climate change impacts but can actually dis-incentivize the basin states from making good faith efforts to support overall system storage. The current tiered system enables potential strategies by Lower Basin states to take certain actions to keep them in specific tiers, as opposed to taking certain actions to benefit the entire system. In the Upper Basin, there really is not an incentive to conserve water for Lake Powell unless that would bump operations into a different tier. For overall system resiliency, we need to move towards a more continuous or curved management scheme that is explicit in how every action benefits the entire system or not. Reclamation has discussed how it will use a Decision-making Under Deep Uncertainty (DMDU) approach to evaluating potential alternatives. One of the key components of DMDU is assessing the vulnerability of a policy, that is, thinking through what would cause it to fail. A more "curved" approach to reservoir operations, as opposed to rigid tiers, is less vulnerable to manipulating the system and incentivizes all users to do what is best for the system overall. In doing so, it is much less likely to fail.	Western Resource Advocates	Bart Miller

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20438	26	ALTOPS - Alternatives - Operations	b. How Colorado River water supply and demand will be balanced for actual water availability conditions within the Basin;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	35	ALTOPS - Alternatives - Operations	c. How reservoir systems will be collectively operated under variable and unpredictable hydrology and changing demands;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20465	11	ALTOPS - Alternatives - Operations	Developing post-2026 guidelines must be paired with a federal commitment to modernizing and improving federal infrastructure, including resolving operational issues associated with the low-level outlet works at Glen Canyon Dam,	California Department of Water Resources	Karla Nemeth
20469	14	ALTOPS - Alternatives - Operations	Resolve the water supply/consumptive use imbalance Balancing and stabilizing the system so that long term average consumptive uses and losses do not exceed the natural supply is absolutely imperative for the long-term sustainability of the Colorado River system and must serve as a primary goal of the Post-2026 Guidelines. GCRG advocates that the BOR include an alternative in the EIS that focuses on maintaining this balance to avoid the current predicament. In our view there is a clear need to avert a future human and ecological catastrophe by meeting this goal. Therefore the purpose of the 2026 Operational Guidelines and Strategies should include a management regime to these ends.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20469	20	ALTOPS - Alternatives - Operations	Alternative paradigm for managing Powell and Mead as one reservoir To date, Lake Mead has been used to trigger consumptive use reductions to the Lower Basin and Mexico, however it is clear that current policies are inadequate to stabilize the system. Going forward, the Upper and Lower Basins need to share equitably in the reductions of flows due to climate change. Managing Lake Powell and Lake Mead as one facility is the innovative and forward thinking concept born out of discussions between some of the foremost experts on Colorado River management and our warming climate: Jack Schmidt, Eric Kuhn, Kevin Wheeler, and Brad Udall. This combined volume approach to water management has become the consensus idea of the Future of the Colorado River Project, and is clearly articulated in White Paper #6 (Alternative Management Paradigms for the Future of the Colorado and Green Rivers), and in the Wheeler et al paper published in Science in 2022. As described in White Paper #6, this new metric "focuses attention of the public and of water managers on the status of the actual resource being managed - the stored available water supply." This option would also allow for better resource protection for Grand Canyon, which we wholeheartedly support.	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20471	22	ALTOPS - Alternatives - Operations	D. In setting annual policy, the Bureau must balance fidelity to natural systems with users' need for predictability. Currently, the Bureau sets its Annual Operating Plans based on near-term modeling of the actual year-to-year flow of the River, and it does not make changes mid-year to the volumes allocated for delivery to users. The Districts strongly support continuing to operate the River system in this way. Mid-year changes in operating plans based on River changes are devastating to communities (such as those in the Districts) that make agricultural plans, and corresponding contractual commitments, many months ahead of time. At the same time, the Bureau should, in setting annual plans, flexibly account for current hydrology and develop those plans based upon the actual flow of the River, rather than on a set, perceived annual volume of water.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	7	ALTOPS - Alternatives - Operations	Regarding Operating Tiers in the Post-2026 Guidelines, the Associations would continue to encourage releases based on storage but should integrate more tiers, especially to protect the critical elevations to prevent the system from crashing.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20481	12	ALTOPS - Alternatives - Operations	A. Manage Lake Powell and Lake Mead operations to reduce the risk of reaching critical elevations in either reservoir. The Post-2026 operations must include predictable and easily understood criteria for releases from Lake Powell to Lake Mead. At the same time, the criteria should also include provisions for adaptation to unexpected changes in hydrology. Striking a balance will be critical to reducing the risk of reaching critical elevations in the two reservoirs while providing water users with the certainty necessary to manage water supplies throughout the term of the Post-2026 operations.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	14	ALTOPS - Alternatives - Operations	To help reduce the conflicts between the Upper Basin and Lower Basin regarding actions that would impact coordinated reservoir operation since the 2007 Guidelines were adopted, Reclamation should evaluate use of new triggers for releases other than Lake Mead and Lake Powell elevations, such as total system contents.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20486	4	ALTOPS - Alternatives - Operations	To that end, the Post-2026 Operations must focus on ways to improve the management of water in Lakes Powell and Mead so as to enhance the protection afforded to the Upper Basin by Lake Powell in addition to minimizing, to the degree possible, the extent and duration of shortages in the Lower Basin. Although Post-2026 Operations cannot guarantee any water user a firm water supply for any specified period, water users in the Lower Basin should be able to determine when, and by how much, water deliveries will be reduced in drought and other low reservoir and water supply conditions. Lower Basin reductions need to be predictable and timely.	State of Wyoming	Brandon Gebhart
20490	31	ALTOPS - Alternatives - Operations	Include the concept of combined volume management between Lakes Powell and Mead suggested by some Colorado River researchers. This option could allow for better management of environmental flows through the Grand Canyon.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20599	4	ALTOPS - Alternatives - Operations	The balancing tiers that were introduced in the Interim Guidelines, and I believe these should be incorporated into long-term management for Lake Powell and Lake Mead.		David Larson
20619	4	ALTOPS - Alternatives - Operations	with minimum flows established the total length of the river.		Paula Dean
20621	4	ALTOPS - Alternatives - Operations	We believe that the 2007 trigger for drought response at 3525' at Lake Powell is inadequate, and doesn't allow the necessary flexibility to BOR decision makers to adjust to lowering lake levels. That the 2007 Interim Guidelines didn't allow for greater flexibility for the lower elevation balancing tier is a glaring flaw in the guidelines in hindsight. This oversight must be corrected in the current planning process.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20700	20	ALTOPS - Alternatives - Operations	B. REDUCE DEMAND. Develop a plan to significantly reduce water demand to stabilize and recover reservoir levels in the short-term and create a more balanced and sustainable system in the long-term.	Grand Canyon Trust	Jen Pelz
20700	21	ALTOPS - Alternatives - Operations	a. To stabilize Lake Powell and Lake Mead, basin-wide water use must be reduced by about 13-20% of the 21st century average (2-3 million acre-feet per year).	Grand Canyon Trust	Jen Pelz

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20700	22	ALTOPS - Alternatives - Operations	b. Both basins play an important role in not increasing (upper basin) or reducing (lower basin) water use to bring the system back into balance. It is important to recognize the balance between lower basin reductions and upper basin limitations on water use. To balance these, Wheeler et al. (2022) "identified combinations of Upper Basin consumptive use limitations and Lower Basin reductions to maintain reservoir levels if the Millennium Drought continues." Id at 374. For example, in one scenario: If the Upper Basin commits to limit water uses to 4.5 MAF/year (60% of their 7.5 MAF/year allocation, approximately 0.8 MAF/year higher than recent use), then the Lower Basin and Mexico must commit to more than doubling their current maximum reductions in existing use to 3.0 MAF/year []. In this scenario, the Lower Basin and Mexico receive 66.7% of their allocation, nearly matching the Upper Basin percentage. Id. at 375. Alternatively, If the Upper Basin limits their depletions to 4.0 MAF/year (53.3% of their allocation, 0.3 MAF/year higher than recent use), then the Lower Basin and Mexico would need to decrease uses by approximately 2.0 MAF/year to stabilize the reservoirs [], assuring 77.8% of their allocation. This is close to recently proposed maximum Lower Basin and Mexico commitments to reduce existing use, which would not be invoked until Lake Mead declines further by 3 MAF. Id. These scenarios are reflected in the figure above where reservoir levels hover around 15 MAF. Id. at 374. This analysis highlights the Upper Basin's significant role in helping stabilize and recover reservoir storage. Lower basin reductions in use are inconsequential if they are offset by increases in demand by the upper basin. Further, it is unrealistic to think, given where we are today, that there is or will be enough water in the Colorado River and its tributaries to support the full upper basin development of their 7.5 MAF allocation under the Colorado River Compact. Therefore, the two basins will have to work together to find a compromise on what their respective allocations should be going forward.	Grand Canyon Trust	Jen Pelz
20817	2	ALTOPS - Alternatives - Operations	5. Ensure that operations cannot favor one basin over the other.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20919	14	ALTOPS - Alternatives - Operations	In addition to accounting improvements, managing the system under flexible but durable operating rules could help the system adapt to a broad range of future hydrologic conditions. The current operational framework based on elevations of Lake Powell and Lake Mead hides the actual risk to the system and increases the challenge of identifying responsive solutions. Basing the management of Lake Powell and Lake Mead on the contents of all reservoirs across the Colorado River system transparently reveals the actual risk to water supplies and allows for an integrated approach to potential solutions. Operational decisions for Lake Powell and Lake Mead under the Post-2026 Operations should include consideration of water stored in reservoirs above Lake Powell.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	21	ALTOPS - Alternatives - Operations	Operations and Operating Determinations Alternatives for the Post-2026 EIS must consider Colorado River reservoir contents, including Upper Basin reservoirs, when determining operations of Lakes Powell and Mead. This strategy could incorporate various water management components including using existing reservoir contents to enhance both water supply and other benefits of the reservoir system for both the Upper Basin and Lower Basin. Operational determinations must address the current uncertainties inherent in the model projections used to set operating conditions.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20923	3	ALTOPS - Alternatives - Operations	Depletion accounting must replace delivery accounting in the Lower Basin. The past decade has made clear that the lack of accounting for system losses in the Lower Basin has been the primary driver in the dramatic decline in storage at Lakes Powell and Mead. Reclamation must institute physical accounting procedures in the Lower Basin that recognize and assess the hydrologic reality of system losses (i.e., transit losses, ordered but not diverted water, and reservoir evaporation). Such losses are inherent in the cost of putting Colorado River water to beneficial use. No contractor, state or basin should be allowed to cause the depletion of more water from the system than their respective legal allotments unless an agreed surplus of system storage has been recharged.	Colorado River District	Peter Fleming
20923	6	ALTOPS - Alternatives - Operations	Tiers that can be manipulated or "gamed" must be eliminated. Post 2026 guidelines should not have defined "black line" tiers that can be gamed by contractors to dictate large volumetric swings in the release volumes from Lake Powell and/or avoid the triggering of required Lower Basin shortage operations. The Colorado River District recommends the development of an incremental "rule curve" that would provide for increased or reduced storage releases in gradual steps that are tied to actual hydrology.	Colorado River District	Peter Fleming
20927	5	ALTOPS - Alternatives - Operations	Based on the operating experience under the existing interim guidelines, alternatives that consider operations of Lake Mead and Lake Powell should not be based*on reservoir elevation triggers that are prone to manipulation and create large swings in release volumes from Lake Powell due to balancing.	Front Range Water Council	Alan Salazar

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20931	4	ALTOPS - Alternatives - Operations	2. Reservoir Operations The Districts believe that continuing to operate Lake Powell and Lake Mead in a coordinated manner that balances reservoir contents to the extent feasible is imperative for the Post-2026 Guidelines. Releases from Lake Powell effectively serve as the sole source of inflows to Lake Mead, and limiting those releases can lead to catastrophic declines in Lake Mead's elevation that Reclamation and Lower Basin users cannot reverse by delivery reductions and conservation. The Districts also appreciate the need to protect elevations in Lake Powell for the overall health of the Colorado River system, continued deliveries of water to the Lower Basin, and generation of hydropower on which many of the Districts rely to produce and distribute irrigation water.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20938	3	ALTOPS - Alternatives - Operations	Lake Powell Releases Should Not be Impacted by Lower Basin Operations Under the current operational framework, Lake Powell releases are directly impacted by Lower Basin operations. The Lower Basin's reliance on Lake Mead storage to satisfy its uses notwithstanding actual hydrology has resulted in larger than average releases from Glen Canyon Dam and drawn down Lake Powell levels. This is evidenced by the five consecutive 9 MAF balancing releases from Lake Powell that occurred from 2015 to 2019. Moreover, operations under the 2007 Interim Guidelines are easily manipulated to cause greater releases from Lake Powell. For example, until 2021, the Lower Basin was able to avoid a shortage determination under the Guidelines while making modest contributions of conserved water to Lake Mead (Intentionally Created Surplus or ICS) in reliance on above average releases from Lake Powell. The Post-2026 Criteria must be structured in a way to avoid manipulation of the system.	Colorado River Authority of Utah	Betsy Coleman
20938	4	ALTOPS - Alternatives - Operations	Activities that Reduce Demand and Protect Critical Elevations Should be Neutral Utah supports sustainable, meaningful conservation activities throughout the Colorado River Basin consistent with the Law of the River as defined in Section E, below. We also recognize the value of operations that protect critical elevations at both Lake Powell and Lake Mead pursuant to existing agreements and authorities. Nevertheless, any future conservation activities or tools to stabilize Lake Powell and Lake Mead should not influence the coordinated operations of the two reservoirs such that they impact release determinations. Rather, these operations should be treated as separate from normal operations and accounted for by the Bureau of Reclamation (Reclamation) as "neutral."	Colorado River Authority of Utah	Betsy Coleman
20938	6	ALTOPS - Alternatives - Operations	Operations Must Not Impair Upper Basin Consumptive Use Post-2026 Operations must consider both the appropriate amount of storage at Lake Powell and the volume of releases from Glen Canyon Dam required to satisfy Upper Basin obligations under the 1922 Colorado River Compact (Compact) without impairment to annual consumptive uses in the Upper Basin pursuant to the Colorado River Compact.	Colorado River Authority of Utah	Betsy Coleman
20942	5	ALTOPS - Alternatives - Operations	Accordingly, Reclamation should look exclusively to coordinated operations of Powell and Mead that have the effect of forcing the Lower Basin into compliance with its long-term river entitlements rather than facilitating the continued and unsustainable overuse. Among the actions that Reclamation should evaluate are requiring the Lower Basin to take into account both evaporation and tributary accruals below Lake Powell in determining required Upper Basin deliveries. Further, Reclamation should evaluate limiting releases from Lake Powell that comport with the provision of the Colorado River Compact that the "Upper Division will not cause the flow of the river at Lee Ferry to be depleted below an aggregate of 75,000,000 acre-feet for any period of ten consecutive years." This would have the effect of limiting Lower Basin habitual over-use and reducing system water evaporation to some degree.	Dolores Water Conservancy District	Ken Curtis
20945	4	ALTOPS - Alternatives - Operations	6. Ensure that operations do not favor one basin over the other. Post-2026 operating guidelines must fairly balance the burden of climate change across the entire Colorado River Basin. The Upper and Lower Basins have equal apportionments of the Colorado River in perpetuity. Water users in the Lower Basin cannot be given priority over water users in Colorado and the other Upper Division States.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	8	ALTOPS - Alternatives - Operations	Going forward, the guidelines for Post-2026 Operations must use actual hydrologic conditions for decision-making, rather than data from projections several months or years into the future, and allow for the restoration and protection of storage in both reservoirs.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	10	ALTOPS - Alternatives - Operations	3. Recognize that Lower Basin overuse is unsustainable and puts the entire system at risk. New guidelines should better assure operational certainty into the future by reducing the imbalance between supply and uses. This will require permanent Lower Basin reductions of 1.2 million acre-feet to 1.5 million acre-feet each year.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20957	7	ALTOPS - Alternatives - Operations	Recommendation: The post-2026 operations should require flows to be released from Glen Canyon Dam in a way that minimizes daily fluctuations, creates flood pulses in the spring (similar to pre-dam flood pulse timing) when sediment levels are adequate, optimizes sediment retention downstream, and keeps water temperatures in the Colorado River through Grand Canyon as cold as possible. [see letter attachment for list of references]	Sierra Club Grand Canyon	Alicyn Gitlin

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20957	8	ALTOPS - Alternatives - Operations	Recommendation: The post-2026 operations must include clear and unambiguous language requiring flows that benefit the CRE, native fish, and/or sandbars in Grand Canyon to be implemented as advised in LTEMP, the Expanded Non-Native Aquatic Species Management Plan, or as analyzed in any other previous or future Environmental Assessment, Environmental Impact Statement, or management plan unless it is physically impossible to pass water through Glen Canyon Dam. Since "regulating flow" and "control of floods" are primary purposes of Glen Canyon Dam in CRSP, and hydropower is not a primary purpose of the dam, regulated flows and controlled floods should be incorporated into the new post-2026 operations as tools to further the intent of the GCPA. Low water levels and hydropower should not be an excuse to avoid actions that will have no net impact on total annual downstream water delivery.	Sierra Club Grand Canyon	Alicyn Gitlin
20976	3	ALTOPS - Alternatives - Operations	The flexibility required in Post-2026 operations should also be extended to overall operational strategies including managing the Colorado River system as a whole. While the strategies utilized in the 2007 Interim Guidelines have served us well for almost 20 years, they have not been without their flaws. The continued precipitous decline of Lakes Mead and Powell, and the regularly necessary creation of new management documents, have shown that new operational strategies should be considered for Post-2026 river management. AMWUA urges Reclamation to evaluate the use of additional operational strategies to effectively address the supply and demand imbalance for the Post-2026 period. This should include operating the Colorado River as one system and the managing of Lakes Mead and Powell as a combined reservoir. While Reclamation should develop other operational tools, the flexibility provided by system conservation and Intentionally Created Surplus (ICS) should not be lost.	Amwua One for Water	Warren Tenney
20976	4	ALTOPS - Alternatives - Operations	Post-2026 Operations Should Increase Reliability for Water Users The last few years under the 2007 Guidelines have involved much uncertainty about how much Colorado River water would be available the following year. Municipal providers need much more time than is provided by the current system, in which next-year delivery volumes are determined after the release of the August 24-month study. Municipalities need time to place orders and make the various necessary adjustments in a city's water production and delivery operations. This uncertainty would be avoided if the Colorado River is managed as one, overall system for increased reliability and regularity (as opposed to maximizing diversions and releases in a given year), in order to provide stability for water users reliant on Colorado River supplies. Achieving this objective will require more conservative reservoir operations and more proactive shortage sharing arrangements. An effort must be made in the new guidelines to not only slow the decline of Lakes Mead and Powell, but to manage the reservoirs in a way that provides more certainty for water users. Strategies to this end include assessing evaporation and system losses proportionally across the Lower Division States and Mexico, as well as evaluating reservoir operations to ensure that coordination is sufficiently holistic and that storage volumes in both reservoirs are protected. We understand that this may mean contending with greater reductions for a longer period until the system is stabilized, but we believe in the long run this will provide increased reliability for all users in the Basin.	Amwua One for Water	Warren Tenney
20985	8	ALTOPS - Alternatives - Operations	ALTERNATIVES FOR THE POST-2026 OPERATIONAL GUIDELINES SHOULD PROVIDE CERTAINTY, CLARITY AND PREDICTABILITY. Overall, one of the most important and impactful considerations in the development of the post-2026 operational guidelines is how alternatives create certainty, clarity and predictability to the greatest extent possible for all users within the Basin. If water users understand the volume of reductions and when and how those reductions will be made, they can do their best to prepare and lessen the impacts. The guidelines must not only include this information but operations must also provide sufficient time for water users to react and adapt. The District understands the Bureau's need to respond to the fluctuations of hydrology that are inevitable in a natural system, but this need must be balanced with water users' need for predictability and certainty. Currently, the Bureau's process for establishing its Annual Operating Plans and approving water orders, though not perfect, works to provide stability to water users, particularly in the Lower Basin. Users generally have adequate time to respond and adjust water use in the following year based on the timing of those operational decisions. As such, the District strongly supports continuation of these existing processes and timelines post-2026. Should these processes and/or methods need to change post-2026 to more adequately respond actual hydrologic conditions, the District urges the Bureau to insure any new processes provide the same level of stability and certainty and allow sufficient time for water users to react and adjust. Mid-year changes in operating plans or approved water orders would be particularly devastating to agricultural water users and their communities given their growing seasons and corresponding contract obligations.	Bard Water District	meghan noblelaw.com; Ray Face
20989	7	ALTOPS - Alternatives - Operations	The time to address the issues with Mead and Powell is now. The Demand Management/ System Conservation Pilot Program is a great idea in theory, but it does not work. It does not amount to enough water to be successful. The whole purpose of Mead and Powell is to have those reservoirs store water for years ahead; not continuing to drain the bank and hoping for another good year the next year.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart

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20996	14	ALTOPS - Alternatives - Operations	Although the Department advocates for water management and conservation practices that result in reservoir elevations higher than those observed over the last two decades, guidelines and strategies that lead to changes in Lake Mead reservoir levels could have consequences for native fishes in the Grand Canyon if Pearce Ferry Rapid becomes inundated or its passage potential otherwise altered. Therefore, the Department recommends that all scenarios influencing Lake Mead water levels be carefully considered and studies quantifying the physical and biological effect of specific elevations should continue. The identification of management actions that prevent high risk non-native fish from colonizing the Colorado River within the Grand Canyon, may be needed if Pearce Ferry Rapid becomes inundated.	Arizona Game and Fish Department	Luke Thompson
21045	1	ALTOPS - Alternatives - Operations	It is time to base the delivery of water from the Upper Colorado River Basin to the Lower Colorado River Basin on the amount of water from the previous water year, the real amount of water. Each basin should get 50%, with the Lower Basin not getting a fixed amount but a percentage of whatÂ's available. Of course, Mexico and the Native American tribes need to be taken into account.		Richard David Quartaroli
21066	3	ALTOPS - Alternatives - Operations	There are a few groups who are very vocal and politically connected, and continually call for the removal of Glen Canyon Dam and the draining of Lake Powell. Their call for the re-engineering of Glen Canyon Dam so more water can be removed is one example. Please do NOT allow these groups to succeed. Do not allow for the decommissioning of Glen Canyon Dam in the future--it should never be a consideration. Lakes Powell and Mead are both needed. We cannot go back to the 1960s. Our current population that continues to grow will not allow for a reservoir to disappear. These anti-lake groups ignore the realities of water and power delivery, which are at the heart of USBR's mission. In moving ahead to post-2026 operations, it makes sense to keep Powell and Mead at viable levels. That means that releases should probably match inflows. When we have a good winter, it makes sense to let Powell fill as much as possible, so releases to Mead can be done in a sustainable manner. In drought years, it makes sense for all Basin States to share the brunt of cuts. Yearly releases should be on a sliding scale depending on the previous winter's snowpack. So it's hard to give exact numbers without knowing those variables.		Tiffany Mapel
21094	1	ALTOPS - Alternatives - Operations	Reclamation must include measures in the Post-2026 Guidelines that will protect the water levels and infrastructure of Lake Powell and Lake Mead.	Southern Ute Indian Tribe	Melvin Baker
21124	1	ALTOPS - Alternatives - Operations	As noted in the Notice of Intent, "[o]ver the past 15 years since the adoption of the 2007 Interim Guidelines, as drought and low-runoff conditions continued, additional responsive actions were needed to complement the 2007 Interim Guidelines" 88 FR 39455, 39455. In other words, the Interim Guidelines were insufficient to protect the System under the conditions experienced in the last twenty years. To prevent this from occurring in the future, we propose that Reclamation establish "guard rails", that is, operational restrictions that constrain future functional use of the System as well as future negotiations such that it would be impossible to return to the position the System faced in Water Year 2022 (WY 22).	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21124	2	ALTOPS - Alternatives - Operations	Furthermore, the 2007 Interim Guidelines failed to consider a sufficiently wide range of hydrological possibilities, to the detriment of the System. In WY 22, Reclamation was forced to reduce Glen Canyon Dam releases to 7.0 maf--480,000 acre feet less than what was dictated by the 2007 Guidelines, but necessary to minimize the risk of damage to Glen Canyon Dam should Lake Powell drop below minimum power pool elevation. The Post-2026 Guidelines must provide management parameters for all possible hydrological outcomes, including those which may be highly unlikely according to existing models.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21124	5	ALTOPS - Alternatives - Operations	It is widely understood that the System suffers from significant evaporative losses. In an annual water year, in which 12.6 maf/yr move through the system, losing nearly 20% of that flow to evaporative losses is simply untenable. Future reservoir operations should also seriously evaluate how to reduce evaporative losses that are approximately 2 maf/yr across the System.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21124	10	ALTOPS - Alternatives - Operations	Demand for water within the System dramatically outpaces supply--there can be no meaningful operational change without a clear approach for reducing demand to meet supply. Leaving the mechanisms for reducing demand up to states has historically been ineffective, as evidenced by the fact that consumptive uses and losses have changed relatively little during the past 40 years. Total basin-wide consumptive uses and losses averaged 14.2 maf/yr between 2003 and 2020 after California reduced its consumptive use from 5.4 maf (2002) to 4.4 maf (2003). While compelling all states within the System to use less water is beyond the purview of Reclamation, the Bureau does have the capacity to create operational criteria to which all states can agree. The Post-2026 Guidelines should address the reality that the annual System flow of 12.6 maf/yr will not support ongoing annual consumptive uses of 14.2 maf/yr.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck

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21142	2	ALTOPS - Alternatives - Operations	In order to help stabilize the Colorado River system, the Commission urges the Bureau to incorporate accounting procedures that will assist in balancing consumptive uses and depletions with the available water supply. Such balancing must include the measurement and allocation of all system losses in the Lower Basin as consumptive uses, including evaporation, carriage, and seepage losses. For example, the 1948 Upper Basin Compact allocates CRSP reservoir evaporation to the Upper Basin states, but currently there is no similar allocation of reservoir evaporation to the Lower Basin states. The Lower Basin states and stakeholders should be consulted to determine how such losses will be apportioned among the states and/or water users.	San Juan Water Commission	Aaron Chavez
21142	3	ALTOPS - Alternatives - Operations	the Bureau should establish a uniform method for measuring, reporting and accounting for such losses when calculating the total available water supply. A consistent, basin-wide approach for measuring and reporting evaporation and other system losses can be a major step toward reducing the Lower Basin's long-term structural deficit.	San Juan Water Commission	Aaron Chavez
21142	4	ALTOPS - Alternatives - Operations	the Commission urges the Bureau to model whether the operational periods for Lakes Powell and Mead should be synchronized. Currently, Lake Powell operations are based on the water year (October 1 through September 30), while Lake Mead operations are based on the calendar year. Coordinating the operational periods might result in less stress on Lake Mead elevations.	San Juan Water Commission	Aaron Chavez
21152	1	ALTOPS - Alternatives - Operations	I am against removing the Glenn Canyon Dam and dropping Lake Meade to a river system instead of a reservoir. My reason to take this stance is 1st, the resevour maybe was a bad decision, but it is there now, 2nd, Tthere is a whole lot of remaining river eco system on the Colorado River and Lake Powell is only a fraction of that.		Sterling and Jonny Stumf
17202	5	ALTPROCESS - Alternatives Development Process	CREDA supports Reclamation's intent to develop vehicles for engagement and outreach. As online tools are developed and made available, CREDA will forward that information to its members, urging that the utilities make available the information to their customers. CREDA will take advantage of public webinars, and if invited, will participate in the Integrated Technical Education Workgroup.	CREDA Colorado River Energy Distributers Association	Leslie James
20341	4	ALTPROCESS - Alternatives Development Process	(4) evaluate a diverse and realistic range of alternatives.	Imperial Irrigation District	Shields, Tina L
20341	18	ALTPROCESS - Alternatives Development Process	Reclamation should identify its proposed action and the no action alternative clearly in the Draft EIS (if not earlier), consistent with NEPA and the CEQ and Department of Interior NEPA regulations, so that the public and decision makers can easily understand what Reclamation proposes, what's being studied in the EIS, and how the alternatives analysis compares the considered alternatives to the proposed action.	Imperial Irrigation District	Shields, Tina L
20385	2	ALTPROCESS - Alternatives Development Process	BOR's development of "a web-based tool that enables users with different levels of technical skill to explore, create, and compare potential operating strategies to enhance the development of alternatives" should include the value that agricultural production brings to the region and nation.	Arizona Farm Bureau Federation	Ana Kennedy Otto
20481	24	ALTPROCESS - Alternatives Development Process	Additionally, alternatives analyzed during the pending NEPA process regarding Near- Term Colorado River Operations should not inform the Post-2026 EIS alternatives. Rather, alternative operational plans for Post-2026 should be informed by the current scoping process and other input from stakeholders during the public process, as well as operating experience under the 2007 Guidelines and the DCP. The Basin States intend to develop an alternative for consideration in the Post-2026 EIS, and will seek to gain consensus support from Tribes in the Colorado River Basin and other stakeholders, as well.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20486	8	ALTPROCESS - Alternatives Development Process	Post-2026 Operations cannot attempt to do too much. The scope of the alternatives analyses for the Post-2026 Operations NEPA process must: 1) Work to fulfill the purpose and need of the proposed action; 2) Fit within the statutory context within which the Secretary has authority to act; and 3) Remain within the bounds of reason. Following passage of the Fiscal Responsibility Act of 2023, bounds of reason are expressly limited by what is technically and economically feasible, among other things. The Secretary is not required and should not waste time on studying alternatives that go beyond the Secretary's statutory authorities to achieve the objectives of the proposed action. Alternatives must fit within and remain compliant with the Law of the River and other federal requirements and regulations. As examples, the Secretary should not consider alternatives which propose run of the river operations, filling Lake Mead first, or decommissioning Glen Canyon Dam.	State of Wyoming	Brandon Gebhart
20497	1	ALTPROCESS - Alternatives Development Process	Alternatives In the Post-2026 Operational Guidelines EIS Reclamation must only analyze legally valid alternatives, which requires it to respect Acts of Congress, Comi Decisions and Settlement Agreements signed by the Secretary of the Interior that are not subject to modification by Reclamation through its administrative actions.	City of Escondido; Vista Irrigation District	Dana White; Jo MacKenzie

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20899	2	ALTPROCESS - Alternatives Development Process	we are also skeptical for the following reasons based on past Reclamation decision-making: * Since 1922, the self-interest displayed by the seven states has impeded the emergence of holistic concepts. * The public has submitted holistic strategies, as they did during scoping in 2005 for the Shortage Criteria EIS, that Reclamation ignored. * In 2006, Reclamation defaulted to the alternative submitted by the seven states and dismissed the diverse strategies from the public. * Reclamation's deference to the states has proven to be the wrong choice because the preferred alternative drained reservoirs Mead and Powell and created a shortage declaration well-before the expiration date of 2007 Interim Guidelines (Year 2026).2 3 * The preferred alternative in the Lower Basin in 2007 did not address the structural deficit (evaporation to the points of diversion), which would have reduced their demand schedule by 1.2 million acre-feet (this evaporation number will increase in the future). * The Upper Basin's preferred alternative in 2007 granted a depletion schedule that would incrementally increase system demands by one million acre-feet. * Investments in system efficiencies justified the preferred alternative that unified the seven states. However, the efficiencies did not account for increased warming, aridification and other climate disruptions, which led us to the current failed state of management. * The supplemental strategies since 2007 didn't close the widening gap of system demand, namely the Pilot System Conservation Program of 2014, Drought Contingency Planning in 2019 (DCP) and the Drought Response Operations Agreement of 2021 (DROA). * In 2022, Reclamation initiated a Supplemental EIS (SEIS) process for the public to submit holistic and sustainable concepts to Reclamation. * In 2023, Reclamation again yielded to an untimely proposal from the seven states with goals that were off-target, and suspending the SEIS process. In light of this history, we are concerned that Reclamation will once again allow the states to monopolize the environmental review particularly in the formulation of meaningful alternatives, which in the past led Reclamation to the dismiss citizen and tribal proposals. The interests of the States should not be able to dominate and preclude consideration of Tribal water rights and environmental issues including instream needs for native fish and riparian resources or alternatives that include bypass or decommissioning of Glen Canyon Dam.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	4	ALTPROCESS - Alternatives Development Process	The EIS should be devoid of politicization unlike the Bureau of Reclamation's recent April 11, 2023, Supplemental Environmental Impact Statement (SEIS) for Near-term Colorado River Operations. The SEIS included two action alternatives: One based on the "concept of priority" and another "not based exclusively on the concept of priority," the legal basis for the later alternative being dubious. The inclusion of the later alternative was viewed as a means of forcing the basin states to work collaboratively in developing a compromise agreement for near-term operations. Presumably, this was done so that the bureau could avoid the inevitable criticism that would be levied against it by one or more parties if it unilaterally enforced existing law.		Craig Morgan; Mike Abatti; James Abatti
20942	2	ALTPROCESS - Alternatives Development Process	SCREENING CRITERIA FOR ELIMINATION OF ALTERNATIVES FROM DETAILED STUDY: Consistent with NEPA Reclamation should develop screening criteria early in the process to eliminate from detailed study alternatives which do not meet the purpose and need of providing certainty and stability to water users in the Colorado River Basin. Any alternative that relies on emergency releases to shore up reservoir levels to secure power production or minimum operational volumes likely can be eliminated from detailed study early in the process. Similarly, system conservation in the upper basin, with or without pools earmarked for specific users or activities, can likely be eliminated from study early in the process upon a showing that no reasonable level of demand reduction can secure reservoir levels to avoid future curtailment given the vicissitudes of hydrology and persistent, habitual overuse in the Lower Basin.	Dolores Water Conservancy District	Ken Curtis
20942	4	ALTPROCESS - Alternatives Development Process	ANALYSIS OF AN ADEQUATE RANGE OF ALTERNATIVES: The alternatives analyzed and carried forward by Reclamation should include only those within Reclamation's authority and competence that satisfy the core purpose of bringing the operation of Mead and Powell into the long-term sustainability that can provide certainty to Colorado River water users to the greatest extent practicable.	Dolores Water Conservancy District	Ken Curtis

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20947	9	ALTPROCESS - Alternatives Development Process	2. Public facing website American Whitewater is very supportive of the Bureau of Reclamation's plan to create a public facing web-tool that is accessible to the public and caters to users with a broad range of technical skills. With the availability and use of the web-tool, it will be even more important that comprehensive metrics for river recreation flows be incorporated into both the educational tool and the operational alternatives. The public needs to be able to understand how all of the uses and values of the river will be affected by operations, including recreation and the environment. We strongly recommend that the web-tool is truly digestible and useful to the average layperson who does not have a background in water law, hydrology, or the complex history of water management in the Colorado River Basin. The web-tool should include the following components: - Photos that portray the recreation and environmental values of the Colorado River - Comprehensive recreational flow preferences that are incorporated into modeled hydrological scenarios (see our above comments that detail available recreational data) - Use of common language (i.e., no jargon) that educate the general public about the complex history of the Colorado River, how water availability is projected to decrease in the future, and how all of the users and values of the Colorado River will be impacted by the proposed alternatives for post-2026 operations. American Whitewater, in partnership with Lotic Hydrological, built an interactive web-tool specifically for the Taylor and Gunnison Rivers in Colorado.8 The tool was built for the Upper Gunnison River Water Conservancy District as part of their watershed management planning effort.9 We offer this tool as an example of a publicly available interactive web-tool that provides users with the ability to, in real time, see how changes in water management affect river recreation opportunities in the local watershed. It also provides an option for people with more technical skills to input custom hydrological scenarios and the potential impact on recreation opportunities. We also ask that the National Park Service and the USGS be directly consulted in the development of the web-tool to ensure that the appropriate recreation data and river values within the Grand Canyon are incorporated into the tool.	American Whitewater	Kestrel Kunz
20952	10	ALTPROCESS - Alternatives Development Process	Quantify the potentially adverse environmental impacts (and benefits) of each alternative to the greatest extent possible (e.g., production of hydropower; changes in water quality). Include resources directly impacted by potential project footprints within the geographic scope of analysis as well as the resources indirectly (or secondarily) impacted by any of the alternatives. Indirectly impacted areas may include downstream segments, source streams where water diversions would occur, and any other resource areas which may be affected by changes in water management or operations. Provide clear maps of the project area, including wetlands and regional water features, and conduct a wetland function analysis if there is any potential that an alternative could cause impacts.	Environmental Protection Agency Region IX	Robin Truitt
20952	11	ALTPROCESS - Alternatives Development Process	The EPA recommends that Reclamation evaluate, in detail, all reasonable alternatives that fulfill the project's purpose and need. We encourage Reclamation to explore alternatives, or elements of alternatives, beyond the agency's direct control, such as partnerships with states and other entities to decrease water use and align distributions with projected supply.	Environmental Protection Agency Region IX	Robin Truitt
20989	6	ALTPROCESS - Alternatives Development Process	A broader range of alternative scenarios need to be made for the Post- 2026 Operations and Guidelines of Mead and Powell. The Colorado River users can't be in the same predicament we are currently in, going from crisis to crisis.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
21081	3	ALTPROCESS - Alternatives Development Process	For example, agriculture is by far the largest user of water in the Dolores River watershed, and the drought has been immensely challenging on many farmers (particularly those with junior water rights,) and the river itself, who's ecosystem is dying. In this way, there may be both an economic and ecological benefit to compensated water transfers (temporary or permanent) in the sub-basin, however, any program must be developed with local leadership and input.	Dolores River Boating Advocates	Rica Fulton
21124	4	ALTPROCESS - Alternatives Development Process	To guide this post-2026 process and continue acting as a leader in Colorado River matters, Reclamation must act to restore public confidence in the Bureau's ability to both manage and measure the System. The parameters used to determine operations, including evaporation, consumptive use, and Lower Basin tributary usage must be accurate and transparent, using agreed-upon data sets. Consumptive use associated with agricultural irrigation is estimated imprecisely. Similarly, in the Upper Basin, consumptive use has been estimated based on broad parameters of acreage irrigated, climate variables, and general county-wide crop mix factors, using decades-old equations and coefficients. The inconsistencies must be remedied to maximize the utility of the 12.6 maf/yr System water. This transparency must extend to seepage around Glen Canyon Dam that produces inflows between the Dam and the Lees Ferry gage, inflows in the Grand Canyon between the Lees Ferry gage and Lake Mead, evaporation from reservoirs, and the effect of depletions in Lower Basin tributaries, including the Gila River, Virgin River, Muddy River, and other tributaries. To have an adequately managed system, it will be essential for the states, Tribes, major water users, and Reclamation to collectively endorse an appropriate methodology, resulting in an agreed-upon data set.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck

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21320	31	ALTPROCESS - Alternatives Development Process	Phoenix appreciates Reclamation's intent to design and implement a stakeholder process that is inclusive, transparent, and encourages meaningful engagement. We support Reclamation's intent to include multiple levels and prioritize regular and meaningful consultation with Tribal Nations. The governance models at the state level used to drive Colorado River negotiations have frequently failed to represent or capture the vulnerabilities of some specific users and sectors. As such, Phoenix recommends that the stakeholder process cultivate sector-driven participation pathways to identify impacts to users and the environment and negotiate and develop alternatives. In certain cases, there are greater commonalities of risks and vulnerabilities among water users within a sector than there are among particular states. For example, municipalities across the Upper and Lower Basin face risks to housing markets and drinking water infrastructure with reduced deliveries and can be one sector. Reclamation's process should engage stakeholders within sectors to truly understand the unique circumstances the sectors face and then engage across sectors to identify (1) sector-specific or multi-sector vulnerabilities and (2) potential solutions or policies to address them that should be considered in a Robust Decision Making based process. At the draft EIS stage, consideration of multiple divergent solutions for Basin management can support shaping a consensus-driven preferred alternative.	City of Phoenix	Cynthia Campbell
4	1	ALTSHORT - Alternatives - Shortages	One of the overriding questions I have on water appropriations that relate to the EIA to address operational guidelines is the way water is allocated. I know the rights to Colorado River water have been adjudicated based on historic water rights and agreements. However, using a finite amount based on acre-feet allocations is flawed, especially when annual flows are so limited as they often have been the last 20 years (2023 exception). Allocations should be based on a percentage of the flow that occurs each year (or perhaps on a past 5-year average at the most), especially since historical acre-feet allocations often cannot be met during drought conditions. To meet acre-feet commitments in 2026 operational guidelines is a fatal flaw, assuming that drought in the western and southwestern US is likely in the future.		Loren Hettinger
11	2	ALTSHORT - Alternatives - Shortages	There also needs to be in place in an emergency plan to avoid a collapse of the ecosystems. For instance, it essentially took 6 years 6 years to develop the drought contingency, planning documents, and that program as developed, did not succeed because additional measures were required, and they were called the Drought Response Operations agreements. Therefore, the contingency plan needs to be effective immediately. The next time Lake Powell or Lake Me drops below elevations for safe hydropower operations.	Living Rivers	John Weisheit
163	1	ALTSHORT - Alternatives - Shortages	It seems like there should be an updated method for determining the outflow of water based on the water levels each year. There should be a variable number, perhaps a percentageâ€¦ With the ability to be increased or decreased, depending on the water each year.		Koko Ford
651	4	ALTSHORT - Alternatives - Shortages	the 3 main Lower Basin states cannot conserve the amount of water we need to conserve and maintain that lifestyle. And when I speak of lifestyle, I address not only providing water to the residents, but also to agriculture. We all have to eat and this part of the country grows a large amount of the winter vegetables and fruit we all love throughout the country. In the same light, agriculture needs to come to the table since they use approximately 75% of the water consumed from the Colorado River. Your new program cannot continue to pay them to just fallow fields to save water. They need to be required to take the money they receive to fallow fields and reinvest a large percentage of that money into efficient irrigation methods to continue to grow the same amount if not more food than they do now. Only so much water can be saved through conservation, we must improve the usage of the water we have available.		Steve Davis
651	7	ALTSHORT - Alternatives - Shortages	A second option would be that the states get a percentage of the run off. This would be more difficult because you don't know the amount of water you can provide until maybe June/July. Whatever method you choose during this project, the states will figure out how to get by on whatever they get.		Steve Davis
654	3	ALTSHORT - Alternatives - Shortages	Not shortages based on arbitrary levels in Lakes Mead and Powell.	University of Arizona	Flessa, Karl W - (kflessa)
654	4	ALTSHORT - Alternatives - Shortages	Not fixed allocations based on a faulty, 100-year old estimate.	University of Arizona	Flessa, Karl W - (kflessa)
654	7	ALTSHORT - Alternatives - Shortages	No effective priority to the Lower Basin; no priority to California within the Lower Basin.	University of Arizona	Flessa, Karl W - (kflessa)
654	8	ALTSHORT - Alternatives - Shortages	OK, supposing we canÂ't avoid the holy scripture of the original fixed allocations. Then accomplish this task via shortage criteria, with shortages determined by how much the average of the past five years of flow are below the CompactÂ's allocations. Then assign shortages in proportion, across the board. No priorities. Allow interstate water marketing of a small portion of the total allocation. See if it works.	University of Arizona	Flessa, Karl W - (kflessa)

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782	10	ALTSHORT - Alternatives - Shortages	Sixth and finally, USBR must divide the water in the river, on an average yearly basis, by distributing it out to water users based on percentages, not absolute amounts. The percentages shall be equitably distributed such that current users receive amounts of water equally proportional to their current diversion amounts.	Save the Colorado	Gary Wockner
832	9	ALTSHORT - Alternatives - Shortages	6. Distributing water allocations to all users based on the percentage of total flow available each year, not a fixed amount.		Gary Wockner
2824	12	ALTSHORT - Alternatives - Shortages	The Department must ensure that whatever plan it adopts to manage Colorado River operations after 2026 should be carefully crafted to prevent the blatant unfairness of this unbalanced result. We strongly urge you and Secretary Haaland to require that any shortages imposed on the State of Arizona be met by curtailing the delivery of water only to non-Indian users, and that the water allocated to Indian tribes by congressionally approved tribal water settlements not be reduced.	Hualapai Indian Tribe	Hannah Waldrop
9184	1	ALTSHORT - Alternatives - Shortages	Water is a source of life for us living in Arizona. The federal govt should apportion off what amount of water each State actually needs. All should be willing to tighten their belts. I know Arizona has. Will California and other states do the same?		Randie Holloway
12806	1	ALTSHORT - Alternatives - Shortages	First Major Item: Is the Evaporation & Conveyance Losses in the Colorado River, between Lake Mead & the Northern Boundary with Mexico. It is estimated the amount of losses is around 1.2 Million acre feet each year. Recommend that each State on the Lower Colorado River reduce there Consumptive Use, based on a percentage of their entitlement to be fair & equable.		Curtis Cloud
12806	3	ALTSHORT - Alternatives - Shortages	However, if my recommendation to limit the CRIT Irrigation Project & the PVID Irrigation District division to only 1.4% of their Consumptive Use & discontinue giving Unmeasured return flow credits between Parker & Imperial Dams. According to the accounting reports none of the Unmeasured water makes it down to Imperial Dam. Based on the water division reduction additional 100,000 acre feet of water will show up at Imperial Dam. Therefore, 100,000 acre feet less will be needed at Imperial Dam. The Unmeasured water will equal an additional 100,000 acre feet. All together a total of 300,000 acre feet of water could be saved.		Curtis Cloud
16804	8	ALTSHORT - Alternatives - Shortages	The scope of the Post 2026 Guidelines should focus on mechanisms that reduce the structural deficit and balance supply and demand using approaches including and beyond adaptations to reservoir operations. Achieving a supply-demand balance will require the painful reduction of consumptive use in many parts of the basin, primarily in the Lower Basin. In many cases, consumptive use must be reduced beyond current allocations to compensate for supply overestimates that have become ingrained into our allocation system, on-going declines in streamflow due to aridification, and the need to refill our reservoirs to reduce vulnerability to future shocks. Doing this will require - but must also go beyond - developing mechanisms to both account for and reduce evaporation and transport losses in the Lower Basin.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16821	6	ALTSHORT - Alternatives - Shortages	2. Require the Lower Basin to limit water use to match the annual hydrology of the river. If the Upper Basin can allocate to each state based upon a percentage of flows that are actually available that year then there is no reason the Lower Basin cannot follow suit.		Teal Lehto
17241	36	ALTSHORT - Alternatives - Shortages	Reclamation should consider operating guidelines that rely on reservoir storage and recent historic hydrology to determine future releases, rather than on projections based on assumptions about future precipitation and climate. Under the 2007 interim guidelines, releases from Lakes Powell and Mead are determined by the prior- year August 24-month study projection of reservoir elevations and did not adequately stem the decline of Colorado River supplies stored in reservoirs. Reclamation should consider the potential to establish new accounting systems (in conjunction with clear and transparent reporting) that allow water users and federal facility managers greater flexibility in managing water supplies. Improved accounting as an alternative to measuring Compact deliveries at Lee Ferry could enable optimized flows through the Grand Canyon.	National Audubon Society	Jennifer Pitt
17241	37	ALTSHORT - Alternatives - Shortages	Evaluate the difference between water shortages and voluntary, compensated reductions in water use - Reclamation and the Colorado River Basin states have gained experience from system conservation pilot projects that date back at least 15 years. When water users engage in voluntary, compensated reductions in water use, the economic impacts are significantly different than when involuntary, uncompensated shortages are implemented, in terms of both the sectors and geographies that engage. A management framework based on voluntary and compensated reductions in water use can avoid shortages to water users least able to adapt to reduced water supplies, such as endangered species and critical urban water uses. Reclamation's analyses of management options should clearly distinguish these different approaches to reducing water uses in the Colorado River Basin, and evaluate a full range of impacts for both, including how the distribution of reduced water use would differ.	National Audubon Society	Jennifer Pitt
19926	2	ALTSHORT - Alternatives - Shortages	Making the allocation of water to users in proportion to the amount of water available is only logical.		Jaye Mundy

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20341	19	ALTSHORT - Alternatives - Shortages	Analysis of management alternatives that protect critical elevations and establish shortage criteria while providing water supply certainty and operational flexibility, including the expansion of programs that allow for voluntary water conservation storage in the system and that build upon, but improve, the Intentionally Created Surplus and Inadvertent Overrun ("ICS") and Payback Policy included in the 2007 Interim Guidelines. Any future voluntary water storage program should provide elevation benefits to the system (i.e., be operationally neutral or top-water banking), and disallow one contractor's beneficial contribution from offsetting another's shortage obligation, which at best maintains the status quo but doesn't truly benefit the system.	Imperial Irrigation District	Shields, Tina L
20341	20	ALTSHORT - Alternatives - Shortages	* Evaluation of one or more alternatives that prioritize smaller, more frequent water use reductions as opposed to larger, less frequent reductions to address supply and demand imbalances. Such alternative(s) would analyze and explain the linkages between shortage triggers, reservoir storage, water use priorities and environmental impacts. IID is concerned that under the 2007 Interim Guidelines, shortage triggers were not reached until 2022 due, in part, to the elevation buffer created by ICS and DCP contributions. By the time the first shortage operating condition under the 2007 Interim Guidelines occurred, reservoirs had been so severely depleted that the risk of jeopardizing critical operational elevations became a real-time concern that suggested a need for significant, drastic responses. The environmental impacts of the actions taken to address these shortages were much greater than they would have been had more frequent, less severe shortages triggered earlier actions. Infrequent severe shortages put all water users at risk, but particularly threaten senior water rights that would not be impacted under a more proactive, conservatively managed system. More frequent, but smaller, shortage reductions at higher elevation triggers and/or shortage reductions in parity with reduced releases from Lake Powell would be more likely to prevent the reservoirs dropping to critical elevations, create less significant environmental and environmental justice impacts, and better adhere to the Law of the River's priority system.	Imperial Irrigation District	Shields, Tina L
20355	1	ALTSHORT - Alternatives - Shortages	Going forward, the DCP's asymmetric application of water reductions must give way to a more equitable apportionment of supply constraints to achieve the even larger reductions that will be necessary. As the largest user of Colorado River water by far, California must anticipate receiving its full and fair share of reductions. Fairness also demands that reductions must involve both the urban and agricultural sectors, and must involve permanent reductions in Colorado River withdrawals, not simply the adoption of short-term expedients, such as temporary fallowing of irrigated land. 2060 has arrived sooner than expected.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20355	7	ALTSHORT - Alternatives - Shortages	Best Practices for Water Efficiency and Wastewater Reuse At least one action alternative in the Post-2026 EIS should include a scenario under which water withdrawals are conditioned upon the adoption of best practices for water efficiency and wastewater reuse that are already in use within the Colorado Basin states. Many important policies to promote urban water efficiency have been developed in the Basin states, but most are not universally applied. A non-exhaustive list would include - * Require removal of non-functional turf grass. (Nevada) * Incentivize landscape conversion and turf removal statewide. (California, Utah) * Adopt stronger efficiency standards for plumbing and equipment. (Colorado, California, and Nevada) * Require urban utilities to report distribution system leakage, and to meet standards for reducing water losses. (California) * Require all new urban landscapes to be water-efficient. (California) * Require metering of landscape irrigation turnouts (Utah) * Ensure that existing buildings are water-efficient when they are sold or leased. (Los Angeles, San Diego) * Develop regulations for indirect (IPR) and direct potable reuse (DPR) of reclaimed wastewater. (California and Colorado for DPR, additional states for IPR)	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20355	8	ALTSHORT - Alternatives - Shortages	The technologies and practices that save water in urban and agricultural contexts are well known and available today. Reclamation should collate the best practices found within the basin, and should model a scenario that will condition a portion of future withdrawals on the adoption of best practices by a date certain. Such measures alone may not provide the entire volume of water savings that is needed to protect critical reservoir elevations. Nevertheless, the avoidance of water waste and unnecessary consumption should be the first place to look for demand reductions, and these are concepts that should be integral to Colorado River operations going forward. Water efficiency is a proven pathway to water reliability, and the tools are at our fingertips if we choose to use them. Los Angeles uses less water today than it did 50 years ago, even while supplying a population that has grown by nearly 50%. Yet even cities and states that have led the way in key areas of water efficiency still need to catch up in others. Now is the time to act on all reasonable options at hand.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20357	5	ALTSHORT - Alternatives - Shortages	2. Require the Lower Basin to limit water use to match the annual hydrology of the river.		Dylan Mori

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20417	15	ALTSHORT - Alternatives - Shortages	a. Shortage determination based both on reservoir elevations and recent hydrology Using only reservoir elevation levels to determine operational and shortage tiers has proven to be sluggish and imprecise in responding to rapidly declining hydrology. One way to improve system management is to include recent hydrology into operational and shortage decision-making. WRA recently commissioned an analysis which showed that if we match Lower Basin shortages to both reservoir levels and recent hydrologic conditions (e.g., 5-year running average of inflows into Lake Powell), and have sustainable levels of use in the Upper Basin, we can end or reverse the decline of Lake Powell and Lake Mead and re-establish a balance between supply and demand. This approach would significantly decrease the risks of Powell and Mead falling to critical levels. In the absence of considering recent hydrology, or perhaps even in addition if it is taken into account, Lower Basin shortages could be more extensive and "earlier on" in the process, such that the shortages required to keep the system in balance are not happening only once the system is on the precipice of crashing, as in recent years.By contrast, an approach of focusing solely on reservoir elevation levels does not provide any guidance for system recovery. We suggest Reclamation include reservoir recovery criteria in the post-2026 guidelines. The post-2026 guidelines need to adequately respond to the river's changing hydrology, so that the Basin can begin to manage demands and ecological needs within the true amount of water that the river provides.	Western Resource Advocates	Bart Miller
20417	22	ALTSHORT - Alternatives - Shortages	f. Adapting long-term consumptive use and losses to available supplies One of the most fundamental components of the post-2026 guidelines will be ensuring that demands throughout the Basin do not exceed available supplies, and that demands will continue to be reduced as flows on the river decline, as is expected. Bringing the system back into balance will require shared shortages across the Basin. Everyone across the basin, and across all sectors of consumptive use, has a role to play. In the Lower Basin, this adaptation will require increased shortage requirements to Arizona, Nevada, California, and Mexico. Reclamation must also account for evaporative and system losses in the Lower Basin, providing equity to the Upper Basin which is charged evaporative losses at CRSP units. This measure alone could reduce uses in the Lower Basin by approximately 0.8-1.2 MAF. In the Upper Basin, uses also will decline should flows continue to decline, and Reclamation should factor into its management alternatives incentivizing decreasing uses in those states to 4, 3.5, or 3 MAF through programs that compensate water users to reduce consumptive use and incentivize keeping those savings in Colorado River tributaries in amounts and at times of the year when they support public resources like recreation and the environment. The Demand Management Storage Agreement could serve as a platform for this work but has not, thus far, been embraced by all Upper Basin states. Regardless, IG 2.0 management alternatives should include the reasonably foreseeable continuation of federal funding to support incentivized demand reduction programs.	Western Resource Advocates	Bart Miller
20431	2	ALTSHORT - Alternatives - Shortages	Address shortage earlier and plan to reduce further SRP suggests that post-2026 management of the Colorado River set forth earlier and more aggressive actions to avoid reaching critical elevations, as were narrowly avoided in 2023. The operational parameters set out in the 2007 Guidelines and Lower Basin Drought Contingency Plan ("LBDCP") were instrumental in protecting the system over two decades of record-breaking drought. Nevertheless, given the observed conditions and future hydrologic uncertainty the next round of guidelines must go further. The elevation triggers set out in Section 2.D.(1) of the 2007 Guidelines, and Appendix D of the LBDCP that set the parameters for Lower Basin reductions, while effective in their own right, proved insufficient to avoid reaching critical elevations in the system. Even when combined with other conservation measures, those triggers were inadequate to prevent the combined storage in Lakes Powell and Mead from dropping to levels that resulted in calls for drastic measures to prevent the system's collapse.6 The average annual yield of the Colorado River is not projected to return to the volumes that laid the foundation of the Law of the River. Further, climate change and natural weather cycles will also result in greater inflow variability in the basin. The next operational guidelines must account for the reduced annual yield and those climatic variations to address the broadest range of inflow scenarios. Additionally, should conditions worsen beyond even the most aggressive projections, lake levels at or below certain elevations should trigger a Secretarial consultation, such as those used in 2021 under the LBDCP Agreement (i.e., the "1,030' Consultation").7	Salt River Project	Leslie Meyers

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20431	4	ALTSHORT - Alternatives - Shortages	Allocate reductions equitably As previously noted, the variability of available Colorado River supplies must be accounted for in the next guidelines using an equitable mechanism for apportioning reductions. Although each Basin's allocation was made in subsequent actions (the Boulder Canyon Project Act and the Upper Basin Compact, respectively), the Lower Basin States have since had to regularly renegotiate to account for shortages, starting with the 2007 Guidelines and then again with the LBDCP in 2019. The negotiated shortage guidelines generally follow the basic principles of the priority system, where the lowest-priority users take the lion's share of the first cuts. This has preserved the system's ability to meet the demands of the most users. However, as the system approaches critical elevations in Lakes Powell and Mead, it has become increasingly important to consider 43 CFR Part 417 beneficial use and efficiency parameters,8 and minimum deliveries necessary to protect health and human safety, including the socioeconomic impacts associated with those actions. Any future shortage sharing arrangements should equitably allocate reductions beyond certain levels, and the effects of any proposed alternatives on the human environment and socioeconomics should be fully disclosed and analyzed in the NEPA process. Equitable allocation of Lower Basin shortages should also include an assessment of evaporation and system losses ("ESL"). All Colorado River water users who benefit from these pieces of infrastructure should share in the obligation of accounting for ESL: net reservoir losses, river losses and regulatory wastes, as those terms are used in Section III of the Criteria for Coordinated Long-Range Operation of Colorado River Reservoirs.9 SRP encourages a full analysis of ESL not based on priority, as ESL is an issue for everyone and should not be viewed through such a lens, so as to differentiate such action from the administration of shortage.	Salt River Project	Leslie Meyers
20465	3	ALTSHORT - Alternatives - Shortages	The post-2026 guidelines need to acknowledge and reflect the varied circumstances associated with Colorado River water use. Colorado River supplies are a sole source of supply in some areas of California and part of a broader portfolio of supplies in other areas. Communities and water users have different capacities for shortage management and need certainty regarding a firm base supply as well as adequate lead time for putting measures in place to cope with shortages. Shortages in Colorado River supplies may also have cascading or unanticipated impacts in areas with multiple sources and it is important to have adequate lead time for addressing those circumstances.	California Department of Water Resources	Karla Nemeth
20465	4	ALTSHORT - Alternatives - Shortages	We recommend that Reclamation fully evaluate its authorities to employ techniques it has used elsewhere (e.g., the Klamath Project) to help users manage shortages, such as voluntary water banks.	California Department of Water Resources	Karla Nemeth
20471	11	ALTSHORT - Alternatives - Shortages	III. Operating within the Law of the River, the Bureau should expand the legal and practical tools available for finding solutions for water shortages. Within the Law of the River, the Bureau has considerable room to innovate to address the shortages of Colorado River water. Expanding the legal and practical tools available to the Bureau and to users may in some instances require separate administrative proceedings. But such tools should be available for all or most of the post-2026 period under examination in the EIS. Accordingly, the Bureau should-- indeed, must--consider how those are likely to be used to improve management of Colorado River water and mitigate environmental impacts from shortages. And in many instances, sound policy development demands that the Bureau commence those processes now, so they can produce better outcomes sooner. The Districts identify and briefly discuss some promising avenues.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	17	ALTSHORT - Alternatives - Shortages	B. All recognize that, at some point in the post-2026 period, the Bureau will need to reduce water deliveries below the level users prefer. Although the priority system answers many questions about how those reductions will occur, additional avenues for reduction exist. One underutilized but legally required tool for careful distribution of water is the suite of processes under 43 C.F.R. Part 417, which requires the Bureau to ascertain every year that each delivery of Colorado River water to "every public or private organization ... in Arizona, California, or Nevada which ... has a valid contract for the delivery of Colorado River water" "will not exceed those reasonably required for beneficial use," according to a number of factors. Id. SSSS 417.1-417.3; see also id. SS 417.5 (governing deliveries to Tribes). Part 417 applies to agricultural and municipal areas alike. To the extent the Bureau has exempted municipal and industrial users pursuant to 43 C.F.R. 417.1(b), those exemptions can no longer be justified given the scale of municipal and industrial water use and the challenges facing the River. Moreover, the Bureau has long recognized that Part 417 applies to both PPRs and junior-priority users. See, e.g., Federal Defendants' Brief Regarding Remedy for 43 C.F.R. Part 417 Breach Found by Court on Motion for Preliminary Injunction at 1, Imperial Irrigation District v. United States, No. 03-cv-00069 (S.D. Cal. 2003) (agreeing with court's finding that Part 417 applied to Imperial Irrigation District's PPR entitlements). Part 417 uses mandatory language: The Bureau must determine that deliveries "will not exceed those reasonably required for beneficial use." 43 C.F.R. SS 417.2 (emphasis added). In other words, Part 417 imposes a mandatory duty upon the Bureau. Thus, for example, the Bureau cannot refuse legal deliveries to junior users without first making any appropriate beneficial use reductions to more senior users. This process must be implemented fairly and equitably. Users (including those in the Districts) who have invested in efficiency improvement over time need not fear such a process, while fair implementation of Part 417 will encourage appropriate measures by other users. As part of that equitable implementation, the Bureau must apply these processes to agricultural and municipal users alike. The Bureau should consider Part 417 processes (and, more importantly, their outcomes) to be well within the scope of analysis of post-2026 operations.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane

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20471	20	ALTSHORT - Alternatives - Shortages	F. Finally, the Bureau should take this opportunity to revise some of the logistical and bureaucratic hurdles to increased conservation. Most obviously, the Bureau should proceed immediately to articulate how it will apply the Law of the River in times of water shortages. The lack of clear, precise, public, legally valid rules for allocation of water in times of shortage is a serious impediment to planning within the Basin and evaluating the impacts (environmental and otherwise) of reduced deliveries. A significant failing of the original DSEIS was its silence on such fundamental issues; because the DSEIS was deliberately ambiguous about those issues, it failed to actually analyze the true impacts of the Bureau's operational proposals. Neither the Bureau nor stakeholders can afford to repeat that experience.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	21	ALTSHORT - Alternatives - Shortages	Another issue of this kind--specific to on-River users with consumptive use entitlements, such as the Districts--concerns how reductions will be administered in practice. Currently, the Bureau determines the Districts' consumptive use after the fact by mathematically netting out their diversions, measured return flows, and Bureau-calculated unmeasured return flows. That approach can be undesirably unpredictable, but it has proven workable in practice if the Districts leave a margin of error between their anticipated consumptive use and their true entitlements. That approach will become untenable if the Districts are told to reduce consumptive use significantly below their true entitlements, but can only control the amount of their diversions. Reconciling these two measurements in a predictable way may allow users to operate more effectively within reductions from their full contractual entitlements. Resolving this accounting issue is relevant to the scope of the Bureau's post-2026 analysis because the Bureau's rules themselves affect how users will respond to reduced flows under different alternatives.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	1	ALTSHORT - Alternatives - Shortages	During the creation of the Colorado River Compact, the Upper and Lower Basins made a major step forward in the formation of the compact by deciding to split the allocation equitably. We are requesting that the continuation of equitable allocations be at the forefront in the Post- 2026 Operating Guidelines, as well as to adhere to the Law of the River. Case in point, prior to the recent agreement of the Lower Basin, the Draft Supplemental Environmental Impact Statement proposed a 4 MAF reduction to the Lower Basin. This would have restricted the Lower Basin to 3.5 MAF while the Upper Basin had no limitations from ultimately topping out at 7.5 MAF of consumptive use. The Associations fully understand that the Upper Basin has historically not utilized their full allocation, but setting a cap on the Lower Basin with no correlating offsets for the Upper Basin does not provide equity.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20478	1	ALTSHORT - Alternatives - Shortages	Operation and management of the Colorado River should minimize the likelihood and severity of future shortages.	Lake Havasu City	Cal Sheehy
20478	5	ALTSHORT - Alternatives - Shortages	Minimize the Likelihood and Severity of Future Shortages Arizona Priority 4 contracts and Nevada have already been impacted by the first two tiers of shortage declarations and the "law of the river," they will do so as shortage declarations continue. These reductions should not lead to the complete collapse of affected interests. An alternative is needed to limit water reductions to contracts that completely reduce Priority 4 contracts to no water deliveries.	Lake Havasu City	Cal Sheehy
20481	17	ALTSHORT - Alternatives - Shortages	B. Address the existing imbalance between available water supplies and demands in the Colorado River Basin. The overallocation of water supplies has combined with the multi-decadal drought and other effects of climate change to drastically reduce storage in Lake Powell and Lake Mead. In the Upper Basin, variable hydrology impacts water availability each year on a source-by-source basis. Despite voluntary actions involving significant financial investments to reduce demands over the last twenty years, the Lower Basin is now implementing significant mandatory supply reductions. The Post-2026 EIS must identify the necessary actions to balance the available water supplies and the uses that rely on the Colorado River. While we have collaborated on past interim measures that appeared bold in their time, we are now called upon to ensure that we use no more than is available to ensure that the Colorado River can continue to serve our needs long into the future.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	21	ALTSHORT - Alternatives - Shortages	D. Enhance predictability of mandatory reductions. Without question, Colorado River users will face mandatory reductions to their water supplies in light of the long-term drought, other effects of climate change, and reservoir elevations. The Post-2026 EIS should define mandatory reductions and evaluate ways to reduce risk associated with those mandatory reductions under variable hydrology. All water users will benefit from additional certainty regarding when reductions will be determined and how those reductions will be distributed, including developing the criteria for operations necessary to protect critical elevations while allowing water users sufficient time to plan for and manage reductions.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20624	5	ALTSHORT - Alternatives - Shortages	Make realistic cuts in expectation for water deliveries. 20% is a reality we all must face.		Steve Munsell
20700	14	ALTSHORT - Alternatives - Shortages	New objectives will need to address the existing imbalance of supply and demand in the basin and will certainly require reducing demand to a sustainable level. Reclamation and the basin states need to rethink the historically exclusive, consumptive, and narrowly tailored way in which we manage and value the Colorado River.	Grand Canyon Trust	Jen Pelz

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20700	24	ALTSHORT - Alternatives - Shortages	d. Equity principles should apply as water use reductions are evaluated. Fundamentally we need to balance supply and demand by making water use reductions in all states and in all sectors; however, in doing so, Reclamation should apply equity principles. All communities in the basin are not similarly situated and Reclamation has an obligation to ensure critical needs are met, that public health is safeguarded, and fundamental access to drinking water exists. For example, the Draft SEIS for near-term operations set out two vastly different approaches to allocating reductions--one largely based on the existing system of priority and the other allocating a pro rata share of the reductions to each water user regardless of priority.	Grand Canyon Trust	Jen Pelz
20700	28	ALTSHORT - Alternatives - Shortages	3. Reclamation must prioritize water conservation and demand reduction as part of any solution. Reclamation must prioritize water use reductions and conservation to maximize management options and flexibility. Bruckerhoff et al. (2021) used environmental metrics to compare "the outcome of combinations of water storage scenarios and consumptive use limits."15 The study determined that where water was stored "was less important when less water was available, highlighting the importance of keeping water in the system to provide flexibility for achieving ecosystem goals." Id. at 1. The authors concluded Reservoir levels of both Lake Powell and Lake Mead will likely continue to decline regardless of where water is stored unless consumptive use is limited, so limiting consumptive use may provide the most flexibility in managing ecosystem drivers.	Grand Canyon Trust	Jen Pelz
20735	1	ALTSHORT - Alternatives - Shortages	See full proposal for alternative in Letter #20735. In short, the most environmentally sound and efficient way to allocate Lower Colorado River water - given that the annual amounts respectively allocated to California, Nevada and Arizona cannot be changed - would be for the Department of the Interior to rescind its approval of the 1931 agreement, and any comparable agreements distributing the water currently allocated to Arizona and Nevada, and auction off the rights to as much Colorado River water as possible to the highest bidders, with the proceeds going to American taxpayers. Introducing the free market into the water allocation system, however, may need to be deferred until 2026. In the short run, the Department apparently has agreed to pay California, Arizona, and Nevada approximately $1.2 billion from now through 2025, in exchange for their agreement to reduce their collective deliveries of Colorado River water over that period by 3 million acre-feet. The States will in turn pay farmers, Native American tribes, cities and others "who voluntarily forgo their supplies" of a total of 3 million acre-feet during that period, or approximately $400 per acre-foot. This counterintuitive approach to water conservation should not, however, be repeated. When the entire Colorado River water system is reorganized in 2026, the Department of the Interior should auction off as much Colorado River water as possible to the highest bidders, in order to ensure that the water is devoted to its highest value uses, and is used as efficiently and environmentally sensibly as possible.		Donald Clark
20817	7	ALTSHORT - Alternatives - Shortages	2. Recognize that the Upper Basin is naturally limited by actual hydrology and that Upper Basin water users experience shortages, which include uncompensated administrative regulation, every year.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20857	1	ALTSHORT - Alternatives - Shortages	I would like to see the lake stay at higher levels and see the output move to a inflow moving average (say 10-20 year average). Letâ€™s fix the problem of using bad data to calculate water allocation and reduce the usage forever. By using an average we should be able to better manage our resources, keep the lake for recreation, power and for the extreme drought years without risk of losing the ramps and power.		Scott Schmidt
20875	3	ALTSHORT - Alternatives - Shortages	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.	Southern Arizona Home Builders Association; Home Builders Association of Central Arizona	David Godlewski; Spencer Kamps
20899	15	ALTSHORT - Alternatives - Shortages	Alternatives Under Various Depletion Schedules and With Elimination of the Structural Deficit (evaporation) The Bureau must analyze a range of depletion schedules, including: (1) an alternative that eliminates the structural deficit; (2) an alternative that prohibits any new Upper Basin Depletions or diversions from the baseline of current use and excludes the "depletion schedule"	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20899	32	ALTSHORT - Alternatives - Shortages	18. Consider new thresholds for tier measurements for implementing curtailment/ shortage schedules.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20919	10	ALTSHORT - Alternatives - Shortages	Balancing the Colorado River System The Post-2026 Operations should recognize the vulnerabilities and supply and demand imbalance that exist in the Colorado River system and manage the system such that the vulnerabilities and imbalance are reduced. The supply and demand imbalance in the Colorado River System stems from numerous factors, including overallocation of water supplies, the impacts of climate change, long-term drought, a failure to properly assess evaporative and system losses in the Lower Basin, and not addressing the uncertainties inherent in the model projections used to set operating conditions. Since 2000, this supply and demand imbalance has led to the decline of reservoir storage and, most recently, threatened critical infrastructure at Lake Powell. It is important to reduce the risk of reaching critical elevations in Lake Powell and Lake Mead to ensure the Colorado River System and its infrastructure can continue to supply the needs of all water users. Protecting infrastructure is a burden all water users should bear as all benefit from the water supply, power and flood protection benefits the dams provide. The volumes of water necessary to achieve such protections, or infrastructure protection volumes, should be shared by all as has been done in the past. See e.g. Yuma County Water Users' Ass'n v. Udall, 231 F.Supp. 548 (1964); Yuma Mesa Irr. & Drainage Dist. v. Udall, 253 F.Supp. 909 (1965). In other words, the burdens associated with protecting the Colorado River System should be shared across all sectors and water users who benefit from the Colorado River and its storage infrastructure.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	13	ALTSHORT - Alternatives - Shortages	Reclamation should consider assessing evaporative and system losses (ESL) to all water users within the Lower Basin. Over the past 10 years, the annual volume released from Hoover Dam and lost to evaporation has averaged around 1.33 maf over the consumptive use requirements of the Lower Division States and Mexico. This is a system vulnerability that must be addressed through the Post- 2026 Operational Guidelines to manage the system that is resilient across a wide range of hydrologies. All water in the system is subject to ESL on a continual basis. Currently, and in particular in the Lower Basin, ESL is not assessed on all water users. Rather, it reduces the supply available for delivery and places the entire burden of ESL on lower priority users. All Lower Basin water users benefit from system storage. All water users should similarly share the burden of the supply impacts caused by ESL.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	26	ALTSHORT - Alternatives - Shortages	Mandatory Reductions Post-2026 Operations should identify those circumstances under which the Secretary would reduce the annual amount of water available for consumptive use from Lake Mead to the Lower Division states to below 7.5 maf, pursuant to the Consolidated Decree. Post-2026 Operations should additionally consider: a. Conditions under which annual amounts of water are available for depletion by Upper Basin uses. b. Conditions under which annual amounts of water are available for consumptive use to Lower Basin uses. The magnitude of reductions should be sufficient to protect critical elevations at Lake Powell and Lake Mead and must be shared equitably among all water users. It is unreasonable and unlawful to impose mandatory reductions solely or primarily upon CAP to protect or build storage in Lake Mead and Lake Powell, particularly when there is 7.5 maf or more of water in the system. The criteria and conditions for mandatory reductions should provide water supply certainty and predictability for water users.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20925	4	ALTSHORT - Alternatives - Shortages	The EIS should consider consistent, realistic, and equitable Basin-wide water use baselines that are based on established water use histories to ensure both the urban and agricultural water sectors maintain sufficient supplies.	San Diego County Water Authority	Dan Denham
20925	6	ALTSHORT - Alternatives - Shortages	Toward that end, the EIS needs to consider the development of mechanisms that can promote these tools while protecting established priority rights, agricultural and urban economies, and the environment. The 2003 QSA can serve as a model of how to implement a transfer based on conservation that protects agriculture and the environment.	San Diego County Water Authority	Dan Denham
20926	2	ALTSHORT - Alternatives - Shortages	The allocations made each year should be made proportionately, based on the actual use of water. The allocations should also use actual stored water and not projected stored water.		Mary Ann Garner

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20929	1	ALTSHORT - Alternatives - Shortages	The current fixed apportionment system is based on cherry-picked, 100-year old science, and doesnÂ't account for the non-stationary nature of the Colorado River. Proportional apportionment, where states, tribes, and Mexico receive a percentage of the most recent 10-year average (as an example), should be incorporated into negotiations of the post-2026 guidelines. There are many benefits to proportional apportionment - a main one being that human beings live within the constraints of nature, instead of within the constraints of legal structures built, in part, based on the whims of our speciesÂ' eccentricities. Fixed apportionment stifles innovation in water management techniques as the structure implies an unchanging, stationary river, which is not the case. Proportional apportionment better aligns with the reality of changing circumstances of the river - and subsequently Western society - and encourages people to develop innovations that adapt to changing levels of apportionment.		Greg Bolla
20931	2	ALTSHORT - Alternatives - Shortages	1. Shortage Reductions Under the 2007 Interim Guidelines and DCP, Arizona overwhelmingly bears delivery reductions, including nearly all reductions until Lake Mead reaches the lowest elevation tiers. In the years since DCP took effect, however, Lower Basin users faced the need to conserve significant volumes in addition to Arizona's mandatory reductions to help prevent Lake Mead declining to critical elevations. Thus, relying on reducing deliveries to Arizona until lower Lake Mead elevations has proved ineffective to protect the Colorado River system under hydrologic conditions like those experienced after 2019. Merely extending the existing framework to expand reduction volumes and shortage tiers borne by Arizona is not a viable solution. Meaningfully increasing shortages for Arizona would cause irreparable harm while offering uncertain prospects for success. Rather, experience under the 2007 Interim Guidelines and DCP shows that protecting the system requires greater cooperation among all Lower Basin users in sharing delivery reductions. To the extent that more Lower Basin delivery reductions are a necessary element of the Post-2026 Guidelines, those reductions should be spread more equitably among Lower Basin states across all tiers to increase the chances of achieving their intended purpose. The Districts also urge Reclamation to consider allocating losses proportionately among entitlement holders, which would be a fair and rational method to reduce the structural deficit and encourage efficient water use practices.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20931	3	ALTSHORT - Alternatives - Shortages	In addition to the method of imposing reduction volumes, Reclamation should consider alternatives to the existing tier framework. Currently, tiers act as stark cliffs by which inches of projected elevation affect hundreds of thousands of acre-feet of water, and for some users mean the difference between a full supply or no supply. The Districts encourage Reclamation to evaluate whether adopting more incremental reductions across a broader range of elevation tiers could achieve protection goals, while also enabling more water users to have access to at least some supply more often than the current framework allows.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20931	6	ALTSHORT - Alternatives - Shortages	Although mandatory reductions under the 2007 Interim Guidelines and DCP were insufficient to protect the system during the last few years, the flexibility afforded water users to voluntarily conserve water has proved effective. The Districts were early participants in voluntary conservation efforts through forbearance agreements with Central Arizona Water Conservation District, which helped sustain Lake Mead elevations above shortage tiers starting in 2014. Voluntary conservation by Lower Basin users has been essential in preventing Lake Mead from declining to critically low elevations during the Interim Period. Adopting a perfect set of shortage tiers and reduction volumes that mitigates risk during the post-2026 period is not a realistic goal. Rather than overestimating reductions required to protect the system, however, the Districts contend that Reclamation should set a baseline that allows reasonable water deliveries over a broad range of elevations, and preserve programs that allow conservation by water users to address immediate term water level declines that may occur at times during the post-2026 period.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20936	8	ALTSHORT - Alternatives - Shortages	Furthermore, the EIS should identify sustainable programs that can incentivize voluntary conservation and maximize water efficiencies and technologies across all sectors throughout the Basin. And, to the extent that financial incentives are included in the programs, a sustainable funding source must be identified. Moreover, Reclamation should enhance the predictability of mandatory reductions for all water users. Colorado River water users will face mandatory reductions to their water supplies given the depleted storage, long-term drought, and other effects of climate change. Water users will benefit from additional certainty regarding how such reductions will be distributed. Accordingly, the EIS should define mandatory reductions and evaluate ways to reduce the risk associated with those mandatory reductions under fluctuating hydrology. In doing so, the EIS should adopt a fair, equitable, and stable mechanism for imposing mandatory reductions.	Gila River Indian Community	Stephen Lewis
20936	10	ALTSHORT - Alternatives - Shortages	The EIS should look at ways in which the Lower Basin can more equitably share reductions in use. Strategies could include: * Finding replacement water for water users that have junior water rights in the system; * Adopting an evaporation and system loss formula in the Lower Basin; and/or * Establishing public health and safety, and tribal cultural and homeland protection volumes to ensure that all water users can count on at least a minimum amount of water even during times when large volume cuts may be necessary. For Lower Basin operations, Reclamation should re-examine how it makes mandatory cuts.	Gila River Indian Community	Stephen Lewis

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20938	1	ALTSHORT - Alternatives - Shortages	Post-2026 Operations Must Address the Imbalance Between Water Supply and Demand Exceedingly low reservoir elevations and runoff in the Colorado River system require substantial revisions to the current operating paradigm. Simply making modest changes to the 2007 Interim Guidelines for Post-2026 Operations will perpetuate the fundamental issue confronting the system: the imbalance between water supply and demand. In order to resolve this water balance problem, Post-2026 operations must include annual reductions to Lower Division State uses of at least 1.2 to 1.5 million acre- feet (MAF). Six Basin States, including two Lower Division States, endorsed reductions in these amounts in their Consensus Based Modeling Alternative for the separate but parallel NEPA process to develop a Supplemental EIS for Near-Term Colorado River Operations.	Colorado River Authority of Utah	Betsy Coleman
20938	2	ALTSHORT - Alternatives - Shortages	Alternatively, shortages in greater volumes and at higher Lake Mead elevations must be assessed against Lower Basin uses in the future to address the system imbalance. Lower Basin reductions under the 2007 Interim Guidelines and the 2019 Colorado River Basin Drought Contingency Plan (2019 DCP) are of an insufficient magnitude to cure the water imbalance . Moreover, under the 2007 Interim Guidelines meaningful reductions do not occur until Lake Mead is at dangerously low elevations. When Lake Mead is below elevation 1, 025', the lowest shortage elevation under the Guidelines and a mere 5' above the Lake Mead "protection" elevation identified in the 2019 DCP, Lower Basin use is reduced 500,000 acre- feet, one third of the volume necessary to balance the system. Under the 2019 DCP, a total reduction of 1.1 MAF is not assessed until Lake Mead is below 1,025.' The Post-2026 Criteria must provide more meaningful reductions in Lower Basin use in order to begin to bring the system into balance.	Colorado River Authority of Utah	Betsy Coleman
20940	1	ALTSHORT - Alternatives - Shortages	Water supply managers throughout the western United States understand that while we hope for winters like 2023, we must plan for the winters of 2021 and 2022. We must immediately address the overuse of the Colorado River water supply by the lower basin states. As an example, during water years 2020 through 2022 the upper basin states averaged approximately 4 million acre-feet of water consumed annually while the lower basin consumed closer to 10 million acre feet of water. Also, the lower basin's consumptive use must always reflect the significant evaporative and transit losses that takes while place storing and delivering water from Lake Mead to the lower basin water users. These are not good examples of equitably sharing our collective water supply in the manner intended by the 1922 Colorado River Compact(CRC). We must hold fast to the foundational tenant of the CRC that uses Equitable Apportionment to share the water supply and not consider Prior Appropriation Doctrine as a means of using the Colorado River water supply in the future.		Ken Brenner
20945	18	ALTSHORT - Alternatives - Shortages	There must also be a thorough analysis of the Secretary of the Interior's ("Secretary") authorities to apportion water and impose shortages in the Lower Basin and to consider opportunities to balance water supplies with depletions there to recover storage at Lake Powell and Lake Mead.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20946	6	ALTSHORT - Alternatives - Shortages	Similarly, any involuntary reductions to water allocations, such as those contemplated by the 2019 Drought Contingency Plan, must also recognize and uphold the rights of PPR holders to the annual flows of the Colorado River.	Yuma County Water Users' Association	James Auza
20952	35	ALTSHORT - Alternatives - Shortages	Potential action alternatives, based on hydrometeorological modeling, could include revisions to reservoir coordination, reapportionment of predicted shortages between basins, states or users, or modifications to drought and surplus guidelines. Present the environmental impacts of the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision makers and the public (40 CFR 1502.14(b)).	Environmental Protection Agency Region IX	Robin Truitt
20955	4	ALTSHORT - Alternatives - Shortages	Shortage Sharing Should be Equitable and Basin-Wide- Water users throughout the Basin and Mexico should all share in the responsibility of taking shortage reductions and making efforts to protect the system. This should include spreading Lower Basin reductions equitably across the three Lower Basin States and analysis of the impacts of actions to be taken by Upper Basin States.	Gilbert Arizona Public Works	Lauren Hixson
20968	2	ALTSHORT - Alternatives - Shortages	The district is concerned the post-2026 operational guides will impact our ability to develop and sustain water supplies within our district boundaries for the benefit of our constituents while also posing a threat on our local economies and taxing districts dependent upon the ability to utilize local water supplies. The upper basin states must also compensate for system water losses (i.e. evaporation and transit) whereas the lower basins are exempt. This is not a balanced agreement and needs to be put on equal grounds. Either both are exempt, or both must account for system water losses.	Rio Blanco Water Conservancy District	Alden Vanden Brink
20972	10	ALTSHORT - Alternatives - Shortages	Mandatory and/or involuntary reductions in water use will be painful and devastating for most users and communities that rely on Colorado River water. One way to reduce these impacts is to prioritize compensated, voluntary reductions. The Bureau should include finding efficient systems to allocate and compensate for reductions in water usage within the scope of its post-2026 process. Existing programs demonstrate that the compensated conservation format is practicable and effective. Voluntary, compensated conservation programs are also fundamentally fair and equitable.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears

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20976	7	ALTSHORT - Alternatives - Shortages	Shortage Sharing Should be Equitable and Basin-Wide Our members have a long history of contributing to efforts on the Colorado River. The AMWUA cities have been leaders in implementing aggressive conservation programs since passage of Arizona's landmark 1980 Groundwater Management Act, today serving over half of Arizona's population with only 11% of the state's water supply. Additionally, many of the AMWUA cities have played a key role in the implementation of Arizona's DCP agreements, contributed to the 500+ Plan, and are participating in the system conservation in 2023. Climate change and reduced flows will continue to have an impact on water users across the Colorado River Basin and Mexico. Users from all areas and all sectors should share in the responsibility of protecting the river system we all rely on. Therefore, we urge Reclamation to spread any Lower Basin reductions equitably across the three Lower Basin States. We also ask Reclamation to consider and analyze the impact of actions to be taken by Upper Basin States, such as shortage reductions and continued DROA releases.	Amwua One for Water	Warren Tenney
20979	2	ALTSHORT - Alternatives - Shortages	Apportionment of the Infrastructure Protection Volume equitably between the Lower Basin states Approximately 1.5 million acre-feet of water is lost each year from Lake Mead due to evaporation and conveyance losses in the Lower Basin. These losses are referred to as Infrastructure Protection Volumes (IPV) by the Lower Basin States. The Interim Operating Guidelines and the Drought Contingency Plan both treat IPV losses as shortage and assign these losses largely to Arizona. IPV losses are not shortage, rather they are a cost of doing business that should not be borne by the reservoir resulting in more rapidly lowering water surface elevations in Lake Mead, thereby increasing shortage reductions primarily to Arizona. The reduction in water supply resulting from aridification of the Basin was not contemplated and is not addressed in the Law of the River. Regardless, this existential threat to all Colorado River water users must be addressed. Those with the greatest benefit of this Colorado River water supply, by volume, should bear the greater proportionate reduction in supply on an annual basis, separate and distinct from the implementation of shortage reductions. Accounting for IPV as proposed is a permanent fix to a long-standing issue in the Lower Basin. Continued depletion of Lake Mead associated with IPV losses increases the risk of serious reductions to the Municipal and Industrial (M&I) priority CAP water supply. To reiterate, the responsibility to absorb evaporation, seepage and system losses should be equitably apportioned to the Lower Basin State's water users based on consumptive water use and must be applied before Lake Mead reaches the currently defined shortage trigger elevations.	Arizona Water Company; City of Buckeye; City of Surprise; EPCOR Inc. (EPCOR Water); Town of Marana; Town of Queen Creek; Water Utility of Greater Tonopah (Global Water Resources); City of Casa Grande; City of Maricopa; Pinal County; Town of Superior	Melinda Whittington; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Todd Pryor
20979	3	ALTSHORT - Alternatives - Shortages	Proposal to Decrease Deliveries Pursuant to a Mid-Year Review Reclamation has previously proposed revision of Section 7.C (Mid-Year Review) to allow for a determination mid-year, to reduce deliveries from Lake Mead. This proposal is counter to the approach taken to date of adopting quantified criteria in advance of the need to implement supply reductions. It should be noted that the 2007 Guidelines only allow for an increase in deliveries mid-year, and only in response to an improved hydrology. Arizona subcontractors, including CAP M&I subcontractors, must minimize uncertainty for the populations they serve and provide clear plans to operate critical water treatment and distribution infrastructure. It would be difficult for Arizona subcontractors to implement additional unplanned supply reductions mid-year, on top of already agreed upon shortage reductions. Instead of adopting mid-year reductions, it would be preferable to adopt criteria for greater volume reductions prior to the start of the operating year. Although shortages and other proposed reductions are difficult to manage, it is better to adjust deliveries to meet critical needs early rather than scrambling to do so late in the year. Reducing the available water supply mid-year runs the risk of endangering public health and safety and places an unnecessary burden on water providers.	Arizona Water Company; City of Buckeye; City of Surprise; EPCOR Inc. (EPCOR Water); Town of Marana; Town of Queen Creek; Water Utility of Greater Tonopah (Global Water Resources); City of Casa Grande; City of Maricopa; Pinal County; Town of Superior	Melinda Whittington; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Todd Pryor
20982	6	ALTSHORT - Alternatives - Shortages	* Post-2026 operating guidelines must fairly balance the burden of climate change across the entire Colorado River Basin. The Upper and Lower Basins have equal apportionments of the Colorado River in perpetuity. Water users in the Lower Basin cannot be given priority over water users in the Upper Division States.	Southwestern Water Conservation District	Steve Wolff
20993	1	ALTSHORT - Alternatives - Shortages	4. Use small, incremental releases balanced with conservation to meet shortages, rather than large-volume, tier-based releases.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
20993	2	ALTSHORT - Alternatives - Shortages	5. Formalize and codify operating policies to address structural deficit accounting in the LB; institute accounting procedures to deal with system losses, including transit and evaporative losses, in a proportional and fair manner, so that losses are shared equitably between both Basins.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
20993	5	ALTSHORT - Alternatives - Shortages	2. Allocate risk from climate change fairly between Upper and Lower Basins; use a methodology based on known scientific climate/drought impacts to adjust future Powell releases.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21163	1	ALTSHORT - Alternatives - Shortages	2. Require the Lower Basin to limit water use to match the annual hydrology of the river. If the Upper Basin can allocate to each state based upon a percentage of flows that are actually available that year then there is no reason the Lower Basin cannot follow suit.		Madeline Cronin
21167	2	ALTSHORT - Alternatives - Shortages	2. Require the Lower Basin to limit water use to match the annual hydrology of the river. If the Upper Basin can allocate to each state based upon a percentage of flows that are actually available that year then there is no reason the Lower Basin cannot follow suit.		Teal Lehto

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21301	2	ALTSHORT - Alternatives - Shortages	The 2007 Guidelines, through tier elevations, established conditions when the Secretary would release 7.5-million-acre feet (normal) or less than 7.5-million-acre feet (shortage) to the Lower Basin States. These tiers were modified by the Lower Basin Drought Contingency Plan to adjust the timing and quantity of reductions. The adjusted schedule for reductions was beneficial since it allowed users to absorb shortages in stages. The elevation at which shortages commence should be evaluated as a part of this EIS process. Adjusting the tier levels upward may be appropriate to ensure sufficient storage for protection of the system to avoid future demands for the creation of exceptionally large quantities of stored water in a short period of time. Water Users should not have to live under a constant specter of draconian cuts down to zero.	Mohave County Water Authority	Jamie Kelley
21301	3	ALTSHORT - Alternatives - Shortages	The system has not produced sufficient supplies to support delivery of 7.5-million-acre feet of water without delivering stored supplies. A quantity of water greater than 7.5-million-acre feet is necessary in order to deliver that amount feet due to evaporation and other losses in transmission. The impact of assessing delivered water its proportionate share of these types of losses without regard to priority or type of use should be analyzed. A proportionate assessment across all sectors receiving deliveries of water yields an equitable result as all water used is subject to the same system losses.	Mohave County Water Authority	Jamie Kelley
21301	5	ALTSHORT - Alternatives - Shortages	The possibility of setting minimum deliveries to ensure the health, safety, and general welfare of municipal populations in times of deeper shortages should be evaluated. To the extent possible, Health and Safety Deliveries should respect the current priority system but may not be able to do so in times of deep shortages. This potential issue was considered by the Supreme Court in its 1963 opinion when it expressly declined to address the issues of shortage so as to leave discretion in the Secretary to act. (See Arizona v. California, 373 U.S. 546, 592 (1963) While it is certainly within the Secretary's purview to decline to exercise discretionary powers to address this issue in the Post 2026 Guidelines, an exercise of that discretion to establish Health and Safety Deliveries would provide certainty to Lower Basin residents. While minimum municipal deliveries for health and safety should not be large enough to sustain lush swaths of non-functional turf, verdant vegetation, or other water wasteful activities, it should be of a sufficient quantity to assure the general welfare of the citizens, with that number being something greater than a minimum number to sustain life.	Mohave County Water Authority	Jamie Kelley
21301	6	ALTSHORT - Alternatives - Shortages	The impact of defining beneficial use should be analyzed, especially as it pertains to permitted uses in times of shortage, to stretch supplies. Underground storage in times of shortage should not be permitted. Users who lack the opportunity for underground storage should not be required to cut water delivered to their population or farm fields to allow another user to store water for future use.	Mohave County Water Authority	Jamie Kelley
21301	7	ALTSHORT - Alternatives - Shortages	The impact of efficiency standards established as a part of a definition of "Beneficial Use" should be analyzed across all sectors and priority of user to extend supplies. Arizona's Yuma Agriculture sets the standard for efficiency in the agricultural sector having consistently achieved efficiencies in the range of 75-80%. Southern Nevada Water Authority sets the standard for efficiency in the municipal sector. Increased efficiencies will stretch existing supplies. However, care should be taken to ensure water users that have achieved efficiencies prior to the adoption of the Post-2026 Guidelines are not penalized for their early stewardship.	Mohave County Water Authority	Jamie Kelley
21301	11	ALTSHORT - Alternatives - Shortages	Not all users of Colorado River water are similarly situated. On-river Municipal users have no ability to create conserved volumes of water due to their location on the Colorado River accounting surface as well as the very nature of their use, which precludes the ability to create any type of ICS contemplated by the 2007 Interim Guidelines. These On-river Municipal users are economically disadvantaged communities, often qualifying as environmental justice communities, who lack the economic resources to build resiliency in their portfolios through augmentation of supplies. These communities need the ability to use effluent to create conserved water through deemed conservation or deemed importation of recovered water (effluent lost to evaporation) or to meet shorted volumes. The ability to use effluent returned to the river to create a new type of conserved water or to satisfy shortage volumes should be analyzed. Some On-river Municipal users have converted or plan to convert city parks to artificial turf reducing the need for effluent for outdoor irrigation. This proposed effluent conserved water would benefit both the user creating it as well as the system as a whole by increasing stored supplies. The users that would benefit from conserved water created from effluent are primarily mainstream municipalities, mostly priority 4, who have no other source of water and no ability to store water economically.	Mohave County Water Authority	Jamie Kelley
21302	5	ALTSHORT - Alternatives - Shortages	Smoother changes in available water deliveries under the Annual Operating Plan. Alternatives evaluated in the EIS should include consideration of a strategy for determining of the annual volumes of water available for allocation and delivery that adjusts deliveries on a more predictable, frequent, and graduated basis to better enable user adaptation over the course of each year or series of years. This would need to reflect a departure from the current "trigger and cliff' methodology for Mead shortage levels and Powell releases, which ties both shortage allocations and reservoir operational schedules to specific elevation tiers projected as of the August 24-month study, and with large step-changes tied to those tiers.	City of Phoenix	Cynthia Campbell
1	3	ALTSOURCE - Alternatives - Water Source	DON'T FORGET THE SALTON SEA RIVER WATER CUTS WITHOUT OCEAN WATER IMPORT WILL KILL THE SALTON SEA IMPORT & DESALINATE OCEAN WATER TO THE SALTON SEA		Linda Joy Salas

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7	1	ALTSOURCE - Alternatives - Water Source	Why don't we consider importing massive water from Mexico to lower Colorado River? And when I say massive water, I mean billions of acre food per year. It is possible it is feasible. It's not expensive. I haven't seen this consideration anywhere in the Bureau's documents, although there is a pattern, our pattern. They don't want to advertise this, but it is possible to do it beyond our idea. So why not? That's my question. The water is not infinite for Colorado, but we can have 2 or 3 times more water. Then we have in the Colorado natural water, then Colorado, because the flow of Mexican rivers to Pacific Ocean is at least twice the Colorado, and it's possible to make our other transfer to. So, we have to think out of the box. We have to see how we solve this problem. So, California will agree and would say, yes, we want to build the these systems. Yes, we can do it, and everybody will have all the what, and there will be no more fighting for it. It will be just drinking whiskey. That's why we have no fighting for water and this drinking whiskey for the all the States around Colorado.		Silviu Dorian Chelaru
8	1	ALTSOURCE - Alternatives - Water Source	Then why don't they use the remainder of the money to cloud seed both the lower and approbation of the Colorado River. I am In the Q. And A. I cited a woman who wrote about Cloud seating for a scientific magazine. What she said was, was that in in Dubai, in the Middle East there are a few clouds, and they cloud seeded them, and there with they got something they didn't expect in Dubai, because they cloud seeded in the middle of the Middle East it flooded. Furthermore, she reported in an article that You know that that that a cloud seating of a small amount of clouds can produce a stadium full of snow. I think this would be the best way to refill the Hoover and Glen King and Dams. What do you think of that?		John Coffee
31	1	ALTSOURCE - Alternatives - Water Source	I urge you to consider and acquiesce to the use of desalinated waters of the Sea of Cortez to sustain the Salton Sea. Though expensive it is the choice most likely to benefit through the process and the result.		Wesley Scales
651	9	ALTSOURCE - Alternatives - Water Source	I also feel that the BOR has to look at investigating the practicality and possibility the movement of water between states. Controversial yes, cheap, of course not. But if we are going to continue to allow the population to continue to grow in the 7 Basin States, we have to find more water. In theory, we could move water from the lower Mississippi River to Lake Powell. In theory, we could move water from the Great Lakes (again, major changes in laws and compacts regarding the Great Lakes). How about from the Columbia River down to Lake Mead. Jason Robison in his book Cornerstone at the Confluence even suggested pulling water down from Canada to the Southwest, now there is a bureaucratic nightmare in today world. We move oil around this country like its water, lets move water around this country like its water. In WWII, the US built an oil pipeline from Louisiana to Virginia in 1 1/2 years to provide fuel for the war effort. A different day and time, yes, (no EPA rules) but it can be done. We have an interstate highway system, use those right of ways to build the pipelines. Get creative. Nobody wants to give up what they have, but we better start doing something before its too late.		Steve Davis
652	2	ALTSOURCE - Alternatives - Water Source	Southern CA has been conserving for over 30 years and now we are on to creating water supplies (desal and water repurification). Also, Nevada has done an excellent job in conservation. These programs are very expensive, especially, the creating water supplies. While the Federal WIFIA loans are great, they still need payback. It would be nice to offer grant funding for large reuse projects so we can offset cost impacts to our rate payers who pay on average $100 a month for water.	Helix Water District	Kathleen Coates Hedberg
655	4	ALTSOURCE - Alternatives - Water Source	Projects should have multiple benefits, for example desalting 6 million AFY of the Sea of Cortez while refilling the Salton Sea with the reject brine. Reject brine into the ocean is normally a big environmental impact. In the Salton Sea, reject brine prevents toxic dust clouds, a huge economic and environmental benefit. Figure 1 shows this multi-benefit project replacing Arizona's 2023 plans for a desalination plant near Puerto Penasco, Mexico with a pipeline through the Organ Pipe Cactus National Monument. The pure water from the pictured Desal Facility can be pumped to Lake Havasu for conveyance to Southern California, Arizona, and water trading to all Colorado River States and Mexico. Figure 1 - Conceptual depiction of multi-benefit Colorado River project About 2 million acre-feet/year (AFY) of desal reject brine, and/or seawater, could grow the Salton Sea with more water than evaporates each year. The Desal Facility can be configured to produce reject brine that is less than 70 parts/thousand (ppt) of salt), less than the Salton Sea's current average. Gulf of California water is 35 to 35.8 ppt. The region has ample solar, geothermal, and tidal renewable energy. The Salton Sea is currently an ill-managed polluted salt dump. Reject brine could make it a well-managed salt disposal site for the farmers of California's Imperial Valley. A similar arrangement could be used to refill Great Salt Lake. See Attachments for Letter #655 for figures. [...] Replacing "senior water rights" Water from a more-expensive-than-river-water project, such as desalting the Gulf of California, can be allocated to states based on how much a state contributes to the cost (capital and operation) of the project. States might adjust their amount and/or fraction of project water annually by trading with each other or adding more desalting modules and conveyance capacity.	Oceanforesters	Mark Capron; Mohammed Hasan
3513	1	ALTSOURCE - Alternatives - Water Source	I still fail to understand why we are not pipelining fresh water from the abundant supply here on the east coast to you folks out there. Remarkably naive in my opinion.		Michael Morgan
5077	1	ALTSOURCE - Alternatives - Water Source	let people drill wells for their water or get a pipeline from teh mississippi which overflows many years.		Bea Shaw

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5995	1	ALTSOURCE - Alternatives - Water Source	One is to bring in another source of water that can grow with the population, Desalinizing ocean water is the only source I can think of. That will be costly; but, if you want to drink, the price is worth it.		Eric Thompson
12804	1	ALTSOURCE - Alternatives - Water Source	Let's think out of the box and get all the massive water that the Colorado River Basin needs. TRANSOCEANIC (transoceanic.us) massive water import systems are the only real solutions for ending our water scarcity FOREVER. (Innovation does move fast!) TRANSOCEANIC can bring ten times more water than desalination, at 1/2 of the investment and 10 times lower acre-ft cost. We propose to import Mexican Pacific river water in very large marine concrete vessels, share it with NW Mexico and the lower US Colorado River basin, and exchange and reallocate the water rights to the upper Colorado River users (see how below). Arizona already has the funds to get a TRANSOCEANIC first article that can transport all the initial water promised by desalination, and California is an economic powerhouse that can easily develop and implement the TRANSOCEANIC concept. Other Colorado Basin states are also interested. Please contact us so we can start the arrangements to solve our water problems; YES, FOREVER (with NO 100-YEAR PURCHASE COMMITMENT REQUIRED BY US).	TRANSOCEANIC LLC	Silviu Dorian Chelaru
15927	1	ALTSOURCE - Alternatives - Water Source	We, Southern Nevadans, along with six other inland states, are totally dependent on the Colorado River for all water needs and suggest that heavily populated California, taking huge amounts of water from the Colorado, get busy and instead, use the vast resources of the great Pacific Ocean for its needs.		Donna B Bubb
19911	1	ALTSOURCE - Alternatives - Water Source	Continuing to build houses in the deserts of Arizona and California without a viable water alternative is a huge mistake. More needs to be done to control the water grab from the Colorado or this might river will be bone dry. We have oil pipelines all over this country why havenâ€™t we done the same with water?		Vicki Mcintee
20191	1	ALTSOURCE - Alternatives - Water Source	Our Business Plan answers each and every issue by providing freshwater to all communities at reasonable cost. The communication, cooperation, involvement and investment from all stakeholders to achieve a lasting sustainable solution is imperative. Importation of sea water for the Salton Sea by its very nature is complex and ambitious but must be done at a large scale to achieve critical environmental and economic sustainability on it own. To return the investments and profits to reinvest in growth and development on itself. SOLUTION: Building a gravitational flowing seawater aqueduct of up to 10 million acres feet annual (AFY), from Sea Of Cortez with all technologies integrated to meet environmental and national security. Control systems and other safety measures to preventing vandalism threats. The lake sits 225 feet below sea level allows flow to the Salton Sea lake without pumping stations. The lake will serve as a reservoir to supply the new hybrid- geothermal brine-less desalination facilities. Desalination is extremely energy intensive. Having said this it is crucial the source be plentiful and inexpensive. The engineering and design requirements for funding and assistance from several federal agencies with programs outlined by President Biden administration in the Infrastructure and Inflation Reduction Act. Our application to the Department Of Energy (DOE), for use of technologies and for funding to build this demonstrational energy project. Under title 17, program that aims to provide 240 billion dollars in funds through loan guarantees, grants and direct loans. To use proven technologies to incentivize their use. Initial use of geothermal energy as a bridge to allow development of the Plasma-Gasification energy facilities infrastructure. Plasma-Gasification is not a new process. It is being used with low energy utilization. The largest form of energy it produces is in heat form which all current facilities using this process do not fully utilize. To incorporate heat capture into the system to generate steam for turbines that generate electricity to power the reverse osmosis desalination component and other systems . Utilized steam is then used to heat incoming seawater cooling the steam into freshwater. A utilitarian process of up to 80 percent of the energy in the municipal solid waste materials. Which is very high in the energy sector. The Plasma-Gasification of municipal solid waste (PGMSW), for desalination financial model only makes sense in extreme large scale and long lifetime projects. The time and cost to develop and implement all agreements between counties, waste companies, labor, convert landfills into processing and transfer facilities, environmental studies, EPA permits and transportation systems again, very time consuming and costly. Geothermal is abundant but not enough for the volume of water needed but a perfect bridge to begin desalination and start generating revenue. The amount of energy demand will be enormous! It's cost must stay low with supply chains dependable able to handle its demand. This demand may include the neighboring states to participate as a source. This would be point in the water purchase agreements with keeping costs in mind. Thankfully trash is a commodity people pay to get rid of. [graphic] Option 1 of Aqueduct and Facilities Map Milestones: We have identified and acquired a particular path for the aqueduct from Mexico's Sea of Cortez to flow down hill to the international border with California without electric pumps. We have obtained all permits from the Mexican federal authorities to build and operate the aqueduct. Help! On the USA side, much work and support for sourcing funds, agreements, needed permits, studies and land acquisition still need to be done. "Diamond in the rough." A opportunity to turn a disastrous situation into a great source of sustainable clean water with ecological and economic benefits in multi sectors should not be wasted. The Salton Sea and surrounding areas are seen as a burden to our nation and characterization to avoid. This plan changes everything. As a nation we have the technology and resources to make this happen. Waste To Power And Water llc, WTPAW, and partner companies have the professionals with deep economic, scientific and engineering backgrounds to build and operate every component of this project. The experienced and qualified people to negotiate and manage communications to the communities.		Edward Quezada

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			To development Sea-2-Sea project collaboration with Salton Sea Management Program , (SSMP). Sea2Sea project aims delivery over seven million acre-feet of freshwater per year. A aqueduct capacity of up to 10 million AFY of flowing filtered seawater from the Sea of Cortez into the lake's ecosystem. This water flow in a controlled manner restores and maintains the lake's water quality serving as a storage feedstock for the desalination/treatment facilities. (1.3-1.6 MAF is lost to evaporation) Acquiring your Support and Agreements to Work together towards the many projects needs and requirements so we can start working on these milestones: 1. Identifying, studying and acquiring Geothermal energy available at available lands 2. Infrastructure of water distribution feed pipelines 3. Future expansion of facilities, 4. Energy feedstocks and storage 5. freshwater storage. 6. Water purchase agreements 7. Alliance with Salton Sea ecological organizations 8. Community outreach and participation 9. Environmental Impact Assessments 10. Land easements 11. Funding 12. Identifying agencies committed to providing assistance. 13. Permissions transferred from USACE 14. -Permits from all required agencies 15. EPA agreements guidance and as part of our pricing formulas. 16. Identifying landfills with over limited capacity permits 17. Agreements for waste with cities and waste companies. 18. Technology use agreements with DOE. 19. Start agreements with Tribal agencies and minority groups to form a Cooperative Alliance for Agricultural Development Agency for sourcing and management of technology education, equipment and funds . To create a fair and transparent process for the allocating and management of agricultural land to the families that demonstrate a willingness to hard work and participate in the required training and long term development of the agency. Provide use of large agriculture equipments, tools, seeds and the many resources that farmers will need to succeed in their business. 20. So many more items that will be listed in the final Business Plan. SEA2SEA Phase 1: Estimated initial investment of the project is estimated at $5,387,895,000. The cost of the aqueduct and intake from the Sea of Cortez to the USA, Salton Sea lake is the largest part. The Geothermal hybrid-desalination power plant and some distribution infrastructure is included. This is the startup funding that is to be returned by sales of freshwater. Metropolitan Water District and Imperial Irrigation District latest agreement the price of water from the Colorado was for 760.00 per acre foot translates to.0023 cents per gallon.. Carlsbad is paying about 2,200/AF. with a 25 year agreement. Using 760.00/AF entry price point a minimum of 527,000 AFY of water sales agreements need to be in place with state agencies, counties, cities and organizations that meet requirements to qualify for the water purchase agreements. This is the financial tipping point for loan servicing is, maintenance, overhead, labor, expenses and profit for the growth. The Estimates of all cost were obtained from the Carlsbad desalination plus 3 recently built facilities and estimates from aqueduct contractors with years and completed project experience. Example 1: Taweelah complex Emirate Abu Dhabi, cost 890 million USD, capacity 900,000/m3/day, Example 2: Jebel Ali M in Dubai,871 million 151,515/m3/day Example 3: Sorek Israel 500 million 627,000/m3/day Example 4: Statica link. Geothermal The water purchase agreements need be for 25 - 35 year commitments. Thus minimizing risks exposure to investors and communities. This initial investment does not include the expenses of upgrades to landfills processing facilities for use of plasma-gasification with municipal solid waste for the larger volumes of water desalination. Sources: The DOE programs still has available funds for grants and loan guarantees for these type of projects. Under title 17. DOE also have access to use patents in technologies of solid waste processing that will increase efficiency and improve transportation of waste. Department of Agriculture can help with grants and loan guarantees for waterways infrastructure to farmers. EPA, offers programs for carbon capture credits and loans for infrastructure projects that affect landfills reductions. Justice 40, is also a program this project qualifies for. This program focuses on helping communities affected by environmental health issues. Last option is going to banks for loans and very last is private investors as this will change the financial culture of the project. Agriculture, Future vision; The Imperial Valley is a major agricultural producer and only one able to provide produce production in winter. Transformation of desert land into farms. Much of lands west of the lake is under California Land management. There are programs that allow for a development of a Farm Cooperative Development Zone to grant land to minority families. A programs like this will increase produce productivity improve food security. Creating a farm Cooperative in a collaborative development with state and federal land management impoverished families can be given a life changing opportunity to build their own business. Increasing global food supplies and local economic growth. [graphic] Possible Agricultural Land Grants for Minority Families Conclude: The Aqueduct and Hybrid-desalination plant has a positive impact on all 7 state's water economy currently being affected by the drought and restructuring of the Colorado River agreement. Also help stop pumping water from Northern California to Metropolitan Water District which is the single most electric energy consuming entity in California. Direct positive impacts Economically from temporary jobs during construction to permanent maintenance and operation jobs. To Restore water levels with continued filtration and maintenance is the fastest permanent solution to micro- dust pollution. With positive direct impacts to the health of the population in general. The lake will directly increase tourism, housing, construction, agriculture and indirect increase housing, retail, gas- grocery stores and service's industries. Indirect positive impacts to other sectors creating a circular economy possible. There is no better way to attract new businesses to the region with so many opportunities doing positive environmental issue solving. The direct and indirect tax revenue for the local, state and federal governments will be in the billions. Economist published National park created 16 billion in 2019 the estimated possible on this project is over well over 40 billion in new direct and indirect revenues annually. Status: We have obtained Permits From Mexico's federal agencies to harvest sea water and to build a aqueduct from Sea Of Cortez to the international California border. (Conditional on Engineering plans) We have bought lands, land rights and easements from Sea of Cortez intake to the International border. Costing over 3 million USD. It is only path that gravity flow and minimal populations physical obstructions For more than four years, WTPAW has been engaged in developing critical aspects of SEA2SEA and undertaking preliminary due diligence.		

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20385	7	ALTSOURCE - Alternatives - Water Source	augmenting water supplies where feasible,	Arizona Farm Bureau Federation	Ana Kennedy Otto
20465	10	ALTSOURCE - Alternatives - Water Source	Reclamation should also pursue opportunities for making use of the federal investment in the Yuma Desalting Plant to support shortage management.	California Department of Water Resources	Karla Nemeth
20481	20	ALTSOURCE - Alternatives - Water Source	The Post-2026 operations should include a framework with incentives for augmenting Colorado River supplies and implementing exchanges to distribute those augmented supplies efficiently through the system, particularly within the Lower Basin. Augmentation could be developed through binational programs like desalination or through regional programs within the United States. These ideas will not come to fruition without the necessary framework for implementation on the Colorado River.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20487	1	ALTSOURCE - Alternatives - Water Source	Importing Ocean water to fill up the drying lake is the immediate solution to stop the toxic dust that is being spread for miles. Importing Ocean water is about saving human lives because the majority of fish and birds died a while back. Importing ocean water from El Mar de Cortez is the most economical and practical choice to limit the increasing health issues. Importing ocean water will solve the present health problems; the future logical follow up is desalination and cleaning up the pollution.		chuck Parker
20576	1	ALTSOURCE - Alternatives - Water Source	I suggest that all the water that was once earmarked for California's farmers of the Imperial Irrigation District to fallow their land be used for cloud seeding. This should be the case if the United States Federal government and/or the United States Department of the Interior do not force the California farmers into fallowing their land. The Upper Basin States seldom use all their water on irrigation. Nonetheless, they are receiving Federal money to fallow their land. Why not earmark the remaining excess to cloud seeding? $2.4 million has already been allocated by the United States Federal government for the Colorado River Basin States to cloud seed. Utah already has allocated over $10 to cloud seeding in Utah. Why not have the Department of the Interior allocate all remaining funds from fighting drought and dead-pool status for either the Hoover Dam or the Glen Canyon Dam to be used to cloud seed in all major parts of the Colorado River Basin that feed the Colorado River, a monetary amount in the billions? Cloud seeding is a proven science that once caused a flood in the Middle East during a drought and cloud seeding has been known to fill a stadium with snow. Cloud seeding is the best answer if the Federal government does not enforce Bureau of Reclamation SEIS option 3.		John Coffee
20919	27	ALTSOURCE - Alternatives - Water Source	Augmentation and Exchanges Several opportunities exist in the Colorado River basin with the potential for augmentation and exchange that would benefit all Colorado River water users including ocean desalination, brackish water desalination, reuse and recycling projects and importation. The Post-2026 Operations should consider a framework for exchanges for implementing potential augmentation projects that could help with the supply demand imbalance on the Colorado River system.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20925	7	ALTSOURCE - Alternatives - Water Source	In considering long-term, durable projects that can provide sustainability to the river's operation, even during unstable periods, the EIS needs to consider investment in seawater desalination as a drought-proof supply. The Water Authority's desalination plant has provided greater resiliency for the San Diego region. The plant has additional, built-in capacity to expand its annual production as well as additional supplies that could support the river and maintain levels in Lake Mead through federal investment in desalination as a stable and sustainable supply.	San Diego County Water Authority	Dan Denham
20936	6	ALTSOURCE - Alternatives - Water Source	Further, the EIS should include a framework with incentives for augmenting Colorado River supplies generally. Augmentation can be developed through binational programs, such as desalination, or regional programs within the United States, and the EIS should evaluate how such augmentation projects can help mitigate the impact ofreductions. The EIS must support the development of these programs to mitigate the impacts of what will almost certainly be reductions in Colorado River water supplies in the Lower Basis under new Post-2026 Operations.	Gila River Indian Community	Stephen Lewis
20946	9	ALTSOURCE - Alternatives - Water Source	invest in desalination, and provide infrastructure for users, such as the Association, that can create return flows to the Colorado River.	Yuma County Water Users' Association	James Auza
20963	17	ALTSOURCE - Alternatives - Water Source	Identifying other federal water programs that could be utilized to augment water supply for selected areas of the Basin. Expanding the water portfolio for urban, rural, agricultural, and Tribal communities and sectors is necessary. Programs such as stormwater capture, water reuse, recycling, agricultural efficiency technology, evaporation reduction--all can be used to augment water supplies to reduce the strain on the Colorado River. Because these and similar efforts are of such great importance to the health of the Basin, our support for a future Colorado River management framework will be measured in part by how this framework works in concert and avoids conflict with other related efforts aimed at promoting greater certainty, building more resilient communities, ecosystems, and economies, and reducing potential conflict over water management decisions going forward.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner

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20963	20	ALTSOURCE - Alternatives - Water Source	Creatively utilize, conserve, and diversify local water portfolios within the Basin. The future will include a less robust and more variable Colorado River water supply. Achieving water supply resilience requires integrated water resource management, or effective use of all forms of water to augment existing supplies, as well as increases in water conservation and efficiency. Support for rain and stormwater capture, water reuse and recycling, improved efficiency of fixtures, appliances, and urban irrigation are vital to support the new management framework and should be promoted as such.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20965	11	ALTSOURCE - Alternatives - Water Source	[Solutions with regard to restoring Salton Sea ecosystem] Water Supply from Local Groundwater These impacts could be mitigated by a make-up inflow of groundwater up to 250,000 AFY in the short term. This is a proposed new water source for the Salton Sea. The groundwater would be recovered by wellfields on the southeast side of the Salton Sea accessing brackish groundwater available from the East Mesa area as far south as the All American Canal and north to Iris Wash. This groundwater is available under undeveloped desert areas east of the East Highline Canal and can be recovered from a few hundred feet depth or less and delivered to the Salton Sea through the unused unlined section of the Coachella Canal, the Iris Wash, and the Z Drain (see Map 1). Much of the conveyance infrastructure already exists in the old abandoned Coachella Canal and IID Z Drain. The conveyance route runs close to the above sea level groundwater resource area enabling gravity flow from the wells to the below sea level Salton Sea. The East Mesa aquifer area is estimated to hold roughly one million acre feet of brackish groundwater [Reference 3]. Over fourteen million AF of brackish groundwater is in the Imperial Valley as a whole. Due to the predominantly brackish water quality, the Imperial Valley is defined by the State as a very low priority groundwater basin and thus exempt from State orders to limit groundwater extraction during recurring drought. There are several existing brackish wells in the East Mesa and nearby areas in the Eastern Imperial Valley that could start supplying water to the Salton Sea in a short time on approval (see Map 2 from Reference 4). These wells were used for groundwater monitoring studies and are mostly available for use. The water quality in these wells is brackish and sourced from Colorado River seepage and local rainfall with TDS similar to water in the IID drain system (see Map 3 from Reference 4) and far less saline than the Salton Sea. Several of these wells have substantial documented flow rate capacity although not enough to fully offset the impacts of a 250 KAFY reduction of irrigation water. Additional well fields could be developed in the area. [see maps 1-3] Wellfield Costs Direct Capital Costs (adjusted to 2013) Source Water Development (2013) $33,682,406 Working Capital (2 months of O&M costs) $426,812 Direct Capital Costs (adjusted to 2011) $34,109,218 Indirect Capital Costs Freight and Insurance, 5% of direct capital cost $1,705,460.92 Owner's direct expense, 10% of direct capital cost $3,410,921.83 Construction Overhead, 15% of direct capital cost $5,116,382.75 Interest During Construction (1/2 of period 6% rate) $1,023,276.55 Indirect Capital Costs $11,256,042.04 Capital Cost $45,365,260 Annual O&M costs Wellfield (2013) $2,548,103 Annual O&M costs Drain Delivery (2013) $12,768 Financial Analysis - cost per acre foot Equivalent Annual Cost (4% bond financed) $5,174,490 Product Water, acre feet 25,000 Equivalent annual cost per acre foot $207 Table 1.Groundwater Make-up well field development costs Cost estimates for new wellfield development are shown in Table 1 based on cost estimates in the 2009 IID Draft Integrated Regional Water Management Plan Appendix N pg. 26 for similar brackish water wellfield development in the same region. A 50,000 AFY extraction rate will be sustainable in the long term, if needed, based on the limits to recharge of the aquifer by IID underruns estimated from historical data and by using the abandoned unlined section of the Coachella Canal as a recharge basin when underruns are available.	The EcoMedia Compass	Andrew McDonagh
20965	14	ALTSOURCE - Alternatives - Water Source	[Solutions with regard to restoring Salton Sea ecosystem] Water from the Ocean Import of water from the ocean can provide a long-term solution to the public health and environmental damage from reduction of Colorado River supply to the Salton Sea basin. While opposed without analysis by State officials for decades, there are reasonable alternatives to increasing water supply to the Salton Sea region by importing ocean water from the Pacific or from the Sea of Cortez and managing the salt content. Several such proposals submitted to the States Salton Sea Management Program are linked here: https://www.ecomediacompass.org/long-term-restoration The State paid $2.5 million to contractors to invent their own proposals in place of a genuine feasibility analysis of any of the proposals submitted, so independent feasibility analysis has not been done. If you wish to speak to any of these project proposers we will be happy to connect you.	The EcoMedia Compass	Andrew McDonagh
20986	11	ALTSOURCE - Alternatives - Water Source	New Mexico does not believe that this EIS is the proper forum to analyze specific augmentation projects.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
21150	4	ALTSOURCE - Alternatives - Water Source	The EIS should analyze the amount of water that would be saved from evaporation through covering all open canals drawing water from the Colorado River like the Colorado River Aqueduct, Central Arizona Project, All-American Canal, and the Coachella Aqueduct. This would also provide a good location for solar panels to assist in powering the pump stations required by the Colorado River Aqueduct and Central Arizona Project to move water to their customers. We have an opportunity to improve the health of the Colorado River while allowing it to continue to provide water for irrigation and residential use.		Cole Paffett
21161	3	ALTSOURCE - Alternatives - Water Source	California can and should invest in more desalination water treatment facilities to provide water. Transporting their water primarily from the Colorado River is wasteful, unsustainable, and unfair to states who do not have alternative sources of water. If major cities in Spain can support a large portion of their drinking water from desalination, California can achieve the same goal for their water usage.		Stephanie Vaughn

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21162	2	ALTSOURCE - Alternatives - Water Source	#NAME?		Kyle Aldridge
Form 3	-	ALTSTORE - Alternatives - Storage	The immense value of Glen Canyon's resources needs to be accounted for as decision makers choose where to store water. Storing water in Lake Powell would drown one-of-a kind natural wonders, destroy emerged riparian ecosystems, and damage delicate archeological sites.	Glen Canyon Institute	
38	1	ALTSTORE - Alternatives - Storage	Iâ€™ve been on that lake since 1968. I watched it rise and fall but I feel any water we can store up river is always a plus as we can always increase discharge rates as needed, but we need it to remain as full as possible.		Russell Hatch
135	1	ALTSTORE - Alternatives - Storage	I am a farmer and I see a need for water storage. If we have more droughts we could run out of water and therefore running out of food. Please consider keeping more water in the reservoirs.		Teanna Beckstead
514	1	ALTSTORE - Alternatives - Storage	I encourage the Bureau of Reclamation to consider updating the water release rules so that we can keep Lake Powell and Lake Mead as full as possible.		Tyler Davis
623	1	ALTSTORE - Alternatives - Storage	I encourage the Bureau of Reclamation to consider how much water they require to be released from Lake Powell to Lake Mead in the future. This should not be tied to a certain amount of water inflow to Lake Powell. While recreation on Lake Powell does play a part that is not the only reason. Lake Powell was created as a water source for the Colorado River Basin. In the last few years with the decrease in water level without the existence of Lake Powell, then Lake Mead would not have any water. It is important to keep Lake Powell at a higher level to ensure a similar instance does not happen in the future when a decrease of precipitation occurs. The water inflow and water output should become equal to ensure Lake Powell remains the water reservoir it was meant to be.		Natalie Hancock
663	3	ALTSTORE - Alternatives - Storage	A high priority should be placed upon increasing the water level in the two reservoirs. We should strive to reach 50% capacity by 2028, and reach 60% capacity by 2038. The upper basin needs to make limited conservation efforts with a target to reduce water use by 10% by 2036. The tribal areas should have a similar limited target to reduce their consumption. The lower basin needs to make the greater cuts to achieve stability in the system.		Neil Fischnaller
1113	1	ALTSTORE - Alternatives - Storage	I believe that lake powell and lake mead should retain as much of the water as is possible. Only release what is absolutely needed. We need to keep as much as we can so when we do run in to dry years, we have some "savings in the bank". I think every lake should operate this way. These past few years should have spoken loud enough that we as a society should take note and save what we can and use it sparingly.		Curtsi Glines
11642	1	ALTSTORE - Alternatives - Storage	Huge reservoir storage that evaporates massive amounts of water are a criminal waste of water. Cover the surface water or store it underground or depleted aquifers. Don't pretend it "can't" be done.		Teresa Seamster
12806	5	ALTSTORE - Alternatives - Storage	Recommend that the Brock Reservoir only store up to 3,000 AF during normal operations. Only fill the Brock Reservoir to capacity in an emergency. To address this issue a Document mandating all the Irrigation Districts that diverts water from the Colorado River below Parker Dam, be party to this agreement. The first provisions should limit each Irrigation District from increasing their diversion by more than 10% with in a 24hour period provided the water is available. Also each Irrigation District must be required to pay back the water they ordered & do not take delivery. Make each Irrigation District more responsible for the water they order.		Curtis Cloud
16727	9	ALTSTORE - Alternatives - Storage	Extending the geographic scope beyond Lake Powell would also reflect federal authorities and actions under the Drought Response Operations Agreement (DROA); the possibility that some form of DROA will be part of the post-2026 guidelines should not be ignored. The 2022 DROA prompted the release of some 463,000 acre-feet of water from Flaming Gorge Dam that flowed more than 430 river miles into Lake Powell. The 2023 DROA will lead to the recovery of some 588,000 AF. Both of these federal actions - part of the 2019 Colorado River Drought Contingency Plan for the Upper Colorado River Basin (itself an extension of the 2007 Interim Guidelines) - significantly altered the timing and magnitude of river flow below Flaming Gorge Dam.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
17241	33	ALTSTORE - Alternatives - Storage	Consider water supply reliability - Reclamation's evaluation of a future Colorado River reservoir management framework should consider the benefits of re-filling reservoirs in the near term as a way to increase the reliability of water supplies for all water users. If Reclamation's impacts analysis emphasizes maximizing volumes of water available for delivery to water users, it may miss the benefit of a more reliable supply.	National Audubon Society	Jennifer Pitt
17285	2	ALTSTORE - Alternatives - Storage	We need to hold on to the water that we get in record breaking years and conserve and minimize output of water in years when the snowpack runoff is low.		Marshall Kinnison

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17405	4	ALTSTORE - Alternatives - Storage	However, we believe that there must be a balanced approach to this issue. I kindly request that the Bureau of Reclamation consider strategies that will maintain reasonably higher water levels in Lake Powell and Lake Mead. This could include revised water management practices, more sustainable water usage policies, and increased investment in technologies and infrastructure that enhance water conservation and reduce wastage.		Joshua Haiges
17725	1	ALTSTORE - Alternatives - Storage	I am aware that Lake Powell has had a significant amount of water inflow this year due to record snow storms. However, there is no need at all to drain as much as you are draining now. Lake Powell was at a record low of water last year and now we finally have it to levels that are enjoyable but with as much water as is being let out, it will drop again very quickly. There is much history behind Powell and the memories it has with many people who all agree that it would be better to have higher levels. Please consider allowing the outflow to be restricted to preserve our lake Powell.		Jake Asay
20221	4	ALTSTORE - Alternatives - Storage	Second, upstream water storage is the most flexible for the entirety of the system, so reservoir levels should focus priority on Lake Powell and Flaming Gorge, before Lake Mead. This can be done in a balanced and responsible way; I'm not advocating draining Mead. But water can't go back upstream, once down.		Ken Jensen
20221	6	ALTSTORE - Alternatives - Storage	This year highlights the problem. A record breaking winter made flows into Lake Powell historic in many ways. But while the water is up significantly, it seems unlikely to last. We are currently pouring water downstream from Powell at double the intake levels despite impaired marinas, launch ramps, etc... There seems to be little effort to rectify the situation; I assume due to water politics driven by downstream populations that won't conserve and limit development until they are required to.		Ken Jensen
20310	1	ALTSTORE - Alternatives - Storage	One of the primary components of the 2007 Interim Guidelines was improved Reclamation management of the Colorado River. They provide additional mechanisms for the storage and delivery of water supplies in Lake Mead to increase flexibility in meeting water use needs from Lake Mead, particularly under drought and low reservoir conditions. In light of the current hydrologic conditions, we believe this will remain a primary component of post- 2026 operating guidelines. To enhance system flexibility, ICFB requests the Bureau of Reclamation consider and evaluate additional Intentionally Created Surplus (ICS) storage behind Hoover Dam for the Imperial Irrigation District (IID). Imperial Valley farmers are leaders in water conservation. We utilize integrated technology, irrigation innovation, and water reuse opportunities to grow more food with less water. To continue being the best steward of scarce and valuable resources, ICFB requests the Bureau evaluate additional Intentionally Created Surplus (ICS) exhibits for IID water users.	Imperial County Farm Bureau	Rachel Magos
20310	3	ALTSTORE - Alternatives - Storage	To best support eleva,ons in Lake Mead, we believe IID should have named storage for Inten,onally Created Surplus (ICS) water with no cap or restric,on on storage of conserved water. Any ICS water stored by IID should not be considered top water in the event of an overflow at Lake Mead/Lake Powell. While in this ,me of drought this is highly unlikely, we need to ensure our efforts are not wasted.	Imperial County Farm Bureau	Rachel Magos
20341	24	ALTSTORE - Alternatives - Storage	* Analysis of alternatives that minimize the probability of material curtailments, such as augmentation, voluntary conservation efforts, water transfers, efficiency improvements, desalination, water recycling, agency partnerships, groundwater use, and/or other programs that address supply and demand imbalances without relying exclusively on substantial water curtailments.	Imperial Irrigation District	Shields, Tina L
20355	5	ALTSTORE - Alternatives - Storage	Shortage Measures Reclamation should expand the pool of parties eligible to create Intentionally Created Surplus (ICS) beyond existing Colorado River contractors to include water agencies and other entities with existing agreements to use Colorado River water, such as retail water agencies or sub-wholesale agencies. Reclamation should eliminate the existing limits on the total quantity of Extraordinary Conservation ICS and DCP ICS that may be accumulated in ICS and DCP ICS accounts, while maintaining existing limits on delivery of such water. All scenarios should include more rigorous application of the Bureau's authority under 43 CFR Part 417 to reduce a contractor's water order for delivery from the Lower Colorado River to the amount that ensures the beneficial use of all water so withdrawn. Part 417 specifies that each year's water order shall be evaluated by the Bureau taking into account several specific factors, including a contractor's land classifications, the kinds of crops raised, the type of irrigation systems in use, the condition of distribution facilities, and the operating efficiencies of the water users. Excessive water duty, antiquated distribution systems, promotional water pricing, and injudicious crop selection can all contribute to excessive water use that should no longer be accommodated. The Bureau should identify and enforce best practices for the avoidance of waste by all Lower Colorado contractors. As part of this process, Reclamation should articulate the criteria or standards that will guide its determinations of beneficial use of water, in a form that lends itself to objective application, monitoring, and compliance assurance to eliminate wasteful use. Such savings should be part of the baseline of each action alternative described in the EIS. As one example, Reclamation could evaluate a measure limiting deliveries to contractors to allow for no more than median levels of unrecovered system losses. That is, if median system losses for such contractors are currently 10% but a particular contractor's unrecovered system losses are 20%, Reclamation would reduce deliveries to that contractor by 10%. Such a measure could further encourage best practices and reduce system waste; when paired with federal water efficiency incentives, it could reduce system demands without affecting beneficial uses.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold

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20385	8	ALTSTORE - Alternatives - Storage	evaluating increased storage capacity to capture seasonal precipitation in sub-watersheds likely to be impacted by the reverberating impacts of less water in the Colorado River system.	Arizona Farm Bureau Federation	Ana Kennedy Otto
20407	2	ALTSTORE - Alternatives - Storage	B. Implementation of ICS or Similar Storage Mechanism in Arizona. We anticipate that the Post-2026 EIS will evaluate mechanisms for voluntary storage and conservation, such as intentionally created surplus (ICS). If a storage and conservation framework is developed that includes statewide limits, Arizona would also require a framework for implementation of ICS or any other mechanism among Arizona Tribes and other Arizona water users, similar to the 2019 Arizona ICS Framework Agreement. If such a mechanism is developed, Arizona will seek cooperation from the United States in a parallel process involving Arizona Tribes and water users.	Arizona Department of Water Resources	Tom Buschatzke
20417	17	ALTSTORE - Alternatives - Storage	c. Combined storage management Coordinating Lake Powell and Lake Mead operations in the 2007 Interim Guidelines was a good step, but falls well short of actually managing the river in a proactive, flexible, and resilient way. Because there are no diversions or human consumptive uses between the reservoirs, Reclamation has the flexibility to manage them as one storage bucket. Further, Reclamation could consider total system storage that incorporates the Upper Basin CRSP units when determining operations. Looking at the Basin as a whole provides Reclamation more flexibility in how and where it keeps water. Importantly for the river itself, if Reclamation manages the reservoirs, including Powell and Mead, holistically in this integrated fashion, it is better able to operate them for the benefit of key environmental resources, such as the Grand Canyon.	Western Resource Advocates	Bart Miller
20417	18	ALTSTORE - Alternatives - Storage	d. Expanding the role of reservoir storage and releases for multiple benefits in the Basin Currently the operating guidelines focus on deliveries of water from Lake Mead, from the tiered operations in shortage guidelines to balancing tiers from upstream. We need to expand the role of storage beyond just delivering water to consumptive users, to assess how that storage can be used for system resiliency. A resilient system does not just deliver water--a resilient system manages the entire system, across the entire basin, focusing on multiple values, including environmental, recreational, and cultural. A resilient system focuses on system integrity as a top priority, as opposed to mechanical water deliveries. The implementation of Drought Operations in 2022 provided a great example of a more flexible approach to addressing system resiliency through creative use of reservoir storage and delivery. Releasing additional water from Flaming Gorge Reservoir in 2022 helped support critical reservoir levels at Lake Powell but also was timed in a way to benefit endangered fish, river recreation, and hydropower at Flaming Gorge dam.	Western Resource Advocates	Bart Miller
20465	6	ALTSTORE - Alternatives - Storage	Similarly, we encourage Reclamation to maximize and facilitate opportunities for entities to store non- project water in system reservoirs through use of tools such as the Warren Act or Emergency Drought Relief Act, separately and apart from the present system of intentionally created surplus. The narrow focus of the present Interim Guidelines has precluded Reclamation from using the full suite of tools available to it under its authorities. Considering climate model projections, it is unlikely that that there will be a future need to limit storage in Lake Mead, and opportunities to store conserved water, system water, or non-federal water in the empty capacity available should be maximized.	California Department of Water Resources	Karla Nemeth
20465	8	ALTSTORE - Alternatives - Storage	The present Interim Guidelines were not designed to facilitate carry-over storage of annual apportionment in Lake Mead except through intentional conservation and they impose significant constraints on intentionally created surplus that should be re-examined and changed. Empty storage capacity is a resource that should be maximized to facilitate capturing wet extremes, including through storage of non-system water via exchanges. There is great potential to expand access to federal storage capacity to a broader group of water users in both the Upper and Lower Basins to improve over-all climate resiliency.	California Department of Water Resources	Karla Nemeth
20471	12	ALTSTORE - Alternatives - Storage	A. The Bureau should analyze post-2026 operations by assuming a revised set of regulations and processes governing the Intentionally Created Surplus ("ICS") system. However well-intentioned, the existing framework is prone to abuse and manipulation. Full revision of the ICS system may require separate proceedings. But if the ICS system is continued under post-2026 operations, the Bureau should reform it in ways that better align with the priority system and sound policy.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	13	ALTSTORE - Alternatives - Storage	First, ICS should be administered in alignment with the Law of the River so as not to disrupt the priority system. The rules developed in the post-2026 process (and the corresponding analysis in the EIS) should ensure that the ICS system does not impact users with rights senior to those of users creating or taking delivery of ICS water. This issue has particular significance in shortage conditions. The Bureau should explicitly state (and analyze the ICS system under the principle) that ICS water retains its priority level for withdrawals: A water user that has created ICS water cannot take delivery of that ICS water in a given year unless all more senior users receive full deliveries of water in that year.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane

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20471	14	ALTSTORE - Alternatives - Storage	Second, the Bureau should consider an alternative under which it winds down the ICS system after 2026. The Districts recognize that the ICS system has protected critical elevations in Lake Mead during an interim period. But because the system is built around ICS creators retaining rights in "conserved" water, rather than engaging in true conservation that permanently reduces the burden on the River system, the ICS system cannot be a path to living within the declining volume of the River indefinitely. At the very least, the limits on each State's creation and storage of ICS should not be increased. ICS water should be administered to benefit the system: A portion should be treated as system water, and ICS water should be charged evaporation losses annually at a minimum rate of six percent from creation to withdrawal (or depletion). Modeling such approaches would provide valuable insight into the relative contribution that the ICS system actually makes toward long-term stability of the River system.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	15	ALTSTORE - Alternatives - Storage	Third, the Bureau should examine equitable participation in the ICS system. The most natural use of the ICS system would entail participation by various users within a State in proportion to their entitlement within the State. But in practice, certain users claim the benefit of an outsized share of their States' ICS space. Ensuring broad and equitable participation would tend to promote confidence and responsible use of the ICS system.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	16	ALTSTORE - Alternatives - Storage	Fourth, the Bureau should audit the conservation activities users employ to create ICS, including the use of alternate sources of water to create ICS surplus, the methods otherwise used to conserve water, and the length of time such activities are deemed to conserve water. The system as it currently functions leads to arbitrary outcomes in ways that the Bureau should correct. Making these corrections may affect how the ICS system interacts with other measures to promote the long-term stability of the River system. Accordingly, they should be considered among the alternatives analyzed in the EIS. The ICS system draws arbitrary lines between eligible and ineligible conservation measures. Some efficiency improvements implemented prior to 2006 that must be re-implemented every year have nonetheless been treated as categorically ineligible. For example, one of WMIDD's applications for ICS water arising from land retired from agricultural use was denied because that land was retired prior to 2006, and thus the water was considered "unused entitlement" rather than ICS-eligible savings--even though WMIDD could turn a profit by returning that land to production tomorrow. But an urban water district is eligible for ICS credit for homeowners who implemented low-flow technology prior to 2006. It appears, therefore, that the year of implementation constrains only some users arbitrarily, when nothing distinguishes next year's water savings from the retired agricultural land and next year's water savings from the low-flow showerhead. This issue is especially salient to the Districts because their farmers implement many conservation measures annually--at high cost--and are frustrated to see that others receive credit for annual improvements while they do not. Those measures include laser-leveling fields at least once annually for more efficient water application; implementing tiered pricing schedules to discourage excess diversions; requiring costly sprinkler irrigation rather than the more cost-efficient "subbing" for germination; requiring growers to fight pests and disease through methods that are more expensive than traditional flooding of fields; and paying for furrow compression several times annually. The Districts struggle to understand why they have been told that these measures do not create ICS--while other users create ICS with analogous measures. That arbitrary result is compounded by the fact that the ICS system is biased in favor of recognizing ICS creation by the most junior users. When a senior water user does not use all of its entitlement, it may be denied ICS credit on the theory that it was not engaged in conservation--and yet that unused entitlement is made available to junior users all the same. But many more junior users have rights to the remaining state apportionment of water, and typically have the option to take delivery of such water for surface or underground storage. If that junior user declines delivery of the water for storage, that user can claim ICS credit for simple inaction. The overall effect is that a senior user that engages in conservation activity may be denied ICS credit, but a junior user not engaged in conservation activity will obtain ICS credit for the same water. The Bureau should consider reform of the ICS program to be within the scope of its post-2026 process. The Bureau should proceed with winding down the program or reforming it to make it more equitable, less arbitrary, and better adapted to the purposes of post-2026 operations.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	3	ALTSTORE - Alternatives - Storage	In addition, the DROA seemed more like a plan for a plan than something comparable to DCP or the 500+ plans. We are asking the Bureau to ensure drought mitigation plans are also equitable in the future.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20480	4	ALTSTORE - Alternatives - Storage	The Post-2026 Operational Guidelines need to protect the ICS currently stored in Lake Mead. SNWA, CAWCD and Metropolitan have spent years and invested millions of dollars to intentionally conserve water that has helped to prop up Lake Mead elevations. This storage must be preserved for the benefit of agencies funding or implementing ICS creation and to Contractors to whom funding agencies have directed credit in accordance with Section 3.B.8 of the 2007 Interim Guidelines and must not be delivered to any other user. The Guidelines should also provide for continued incentives to conserve water for the benefit of Lake Mead.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman

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20481	15	ALTSTORE - Alternatives - Storage	Alternatives should also consider the use of storage in the Colorado River System to support critical elevations at Lake Powell and Lake Mead.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	18	ALTSTORE - Alternatives - Storage	The Post-2026 EIS should evaluate mechanisms, such as ICS, for voluntary conservation and storage to provide individual contractors and entitlement holders with water supply flexibility and the ability to manage annual demand variability, as well as to protect the system as a whole. While we have voluntarily conserved water through the development of ICS, we must broadly re- evaluate all parameters of the program to ensure that it properly incentivizes conservation while avoiding negative impacts to other water users.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20482	4	ALTSTORE - Alternatives - Storage	Operational experience illustrates that the 2007 Guidelines and the 2019 Drought Contingency Plans are insufficient to properly manage Lakes Powell and Mead. Extended periods of dry hydrology and depleted reservoir conditions have highlighted the inadequacy of these measures to adapt to worsening hydrology.	State of Wyoming; State of Nevada; State of California; State of Arizona; State of New Mexico; State of Colorado; State of Utah	Brandon Gebhart; John Entsminger; JB Hamby; Thomas Buschatzke; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20486	7	ALTSTORE - Alternatives - Storage	Post-2026 Operations must seek full utilization of storage in Lakes Powell and Mead. Dry hydrology exacerbated by climate change continues to cause depleted flows into Lake Powell. As such, the Secretary must make any infrastructure improvements needed to safely operate Glen Canyon Dam below the minimum power pool elevation and gain access to the maximum storage available in Lake Powell. As climate change continues to diminish the water supply, and ultimately the Lee Ferry flow, we must have access to all Lake Powell storage. Similar infrastructure improvements should be made at Lake Mead.	State of Wyoming	Brandon Gebhart
20490	1	ALTSTORE - Alternatives - Storage	2. Rebuild Reservoir Storage Proactively - The system should be operated, particularly in the first few years of this Post 2026 plan, such that the reservoir storage is recovered sufficiently by using a percentage of inflow during all water year types (both drier and wetter years). The system must have enough storage to tolerate periods of extreme low inflow without reservoir elevations falling below thresholds related to dam safety, water supply, power production and significant environmental issues, recreational, and regional economic impacts.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	23	ALTSTORE - Alternatives - Storage	The Need to Rebuild Storage before Extreme Low Inflows The NPS is concerned that the alternative ultimately selected for implementation of the 2007 Interim Guidelines Supplementary EIS (SEIS) will not provide sufficient reductions in consumptive use in the Lower Basin to protect critical water levels in Lakes Powell and Mead. While there has been slightly above average hydrology in 2023 that has resulted in an additional 6 maf of storage, NPS is concerned that this has reduced the perceived need to make large proactive cuts to consumptive use. The NPS recommends that additional proactive cuts be considered in alternatives during a first phase of the Post-2026. The combined Upper and Lower Basin consumptive uses and losses between 2000 and 2020 have been approximately 13.5 maf per year (Schmidt et al. 2023) but during that same time period there have been three years in which inflow to Lake Powell was less than 4 maf, and one of those years' inflow was 3 maf. Therefore, the additional 6 maf storage that was built in 2023 may be used quickly if the next few years include one or more of these very low inflow years. Therefore, Post-2026 operational strategies must consider proactive ways to rebuild the volume of water stored in Lakes Powell and Mead rather than waiting to manage in a crisis. Without sufficient system storage that balances consumptive use with available supply, the system will always be at risk of collapse. Just two or three consecutive years of low to very low inflow to Lake Powell could lead to a system collapse with enormous economic, political, and societal consequences. For the Post- 2026 operational strategies, it is imperative that the federal government encourage the states to not count on 'good flow years' but rather to plan for the worst and plan for it to occur very soon.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	27	ALTSTORE - Alternatives - Storage	Initiate usage cuts proactively to rebuild and maintain adequate water storage buffers in both Lakes Powell and Mead. This should rebuild a buffer sufficient for three extreme low flow years in a row and may require making cuts even in good hydrology to rebuild levels quickly.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20700	52	ALTSTORE - Alternatives - Storage	2. Reclamation should investigate the costs and benefits of how storage is distributed between Lake Powell and Lake Mead under low reservoir elevations. The 2007 Guidelines prioritized the balancing of reservoir elevations at Lake Powell and Lake Mead. This may not be feasible given the worst-case scenario that these reservoirs remain at only a fraction of their capacity or fall even further below where they are today. Schmidt and Kuhn (2023) warn that "[t]he likelihood that the combined storage in Lake Mead and Lake Powell will rarely exceed 50% of capacity (K. Wheeler et al., 2022) suggests a need to evaluate the environmental and hydropower trade-offs associated with policy alternatives that emphasize storage of water in Lake Powell or Lake Mead." Id at 8. We agree that it may be time to investigate the scenario of low reservoir storage and evaluate the costs, benefits and impacts of different reservoir elevations and storage alternatives for the worst-case scenario. Such climate resilience planning would allow Reclamation and the basin stakeholder to get ahead of the next emergency on the river and develop a plan forward. In summary, worst-case scenario planning could ensure that the infrastructure and operations of Lake Powell and Lake Mead can withstand low flows and reservoir elevations. In the future, it is possible that the Grand Canyon Protection Act of 1992 may mandate that some of these worst-case scenario plans are implemented if the existing mitigation and balancing choices fail to meet the mandates of "protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established." It is possible that at very low reservoir levels many of the mitigation measures set forth in LTEMP (e.g. high flow experiments) to offset and improve conditions in the Grand Canyon may be very difficult if not impossible to conduct. Thus, this type of investigation may prove important given the mandates of the Grand Canyon Protection Act of 1992 going forward.	Grand Canyon Trust	Jen Pelz
20738	12	ALTSTORE - Alternatives - Storage	The more voluntary conservation efforts can be incentivized and facilitated as part of this effort, the less disruptive and painful the Basin's adaptation to a drier and hydrologically more uncertain future may be. To this end, programs that incentivize reservoir storage, such as the 2007 IGs Intentionally Created Surplus (ICS) mechanism, should be extended- but with lower barriers to tribal participation. In addition, consideration should be given to managing created system conservation water in a manner more akin to ICS, where it can remain in Lake Mead and thus protects its elevation - for multiple years. For example, the federal ICS account created under the 2007 IGs could be reinvigorated. The current mechanism of rolling system conservation water into the overall water budget after its year of creation minimizes the conservation - and reservoir protection - benefits that might otherwise be realized.	Quechan Indian Tribe	Jordan Joaquin
20817	6	ALTSTORE - Alternatives - Storage	4. Include durable, effective, and flexible mechanisms to protect storage and critical elevations at Lake Powell and Lake Mead and to rebuild depleted storage at both reservoirs.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	13	ALTSTORE - Alternatives - Storage	While forecasting may be necessary in some situations, the Post-2026 Operations must primarily focus on responding to actual conditions and rebuilding and protecting storage at Lake Powell and Lake Mead.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	3	ALTSTORE - Alternatives - Storage	We are also concerned that some of the interim strategies and agreements including the so-called "intentionally created surplus," the DCP, and the other credit/surplus systems are not viable and could exacerbate future shortages. Reclamation's modeling for the EIS should look how any "calls" on that "credit" from all these agreements could affect the system as a whole. If this analysis is done, we believe it will be clear that the current credit/surplus structure is unworkable without additional sideboards and limitations.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20912	1	ALTSTORE - Alternatives - Storage	As noted in the Federal Register notice, the period from 2000 to 2023 is the driest period in more than a century and one of the driest periods in the last 1,200 years. IVH2O welcomes this opportunity to share organizational priorities for consideration in the post-2026 Colorado River reservoir operational guidelines which we believe will maximize system flexibility and resilience during this period of challenging hydrology. One of the primary components of the 2007 Interim Guidelines was improved Reclamation management of the Colorado River. They provide additional mechanisms for the storage and delivery of water supplies in Lake Mead to increase flexibility in meeting water use needs from Lake Mead, particularly under drought and low reservoir conditions. In light of the current hydrologic conditions, we believe this will remain a primary component of post- 2026 operating guidelines. To enhance system flexibility, IVH2O requests the Bureau of Reclamation consider and evaluate additional Intentionally Created Surplus (ICS) storage behind Hoover Dam for the Imperial Irrigation District (IID).	Imperial Valley Water (IVH20)	Stephen Benson

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20912	2	ALTSTORE - Alternatives - Storage	Imperial Valley farmers are leaders in water conservation. We utilize integrated technology, irrigation innovation, and water reuse opportunities to grow more food with less water. To continue being the best steward of scarce and valuable resources, IVH2O requests the Bureau evaluate additional Intentionally Created Surplus (ICS) exhibits for IID water users. To fully incentivize water saving efforts, there must be recognition and credit for as-of-yet unrecognized, on-farm conservation efforts. Progressive policy changes should allow for flexible management of water generated through efficiency-based conservation measures. To this end, IID should pursue Basin recognition of known, verifiable, intentionally created conserved water, such as, but not limited to, cascading, well pod seepage recovery, crop rotation, organic cropping, cultural practices such as but not limited to drip irrigation, on-farm seepage recovery, solid set sprinklers, overhead sprinklers, center pivots, etc. Fallowing is the least desirable method of conservation due to its social and economic impacts. However, limited use of seasonal fallowing with in-place crops, like forage products, should be reviewed and evaluated for Post-2026 Colorado River guidelines.	Imperial Valley Water (IVH20)	Stephen Benson
20912	3	ALTSTORE - Alternatives - Storage	To best support elevations in Lake Mead, we believe IID should have named storage for Intentionally Created Surplus (ICS) water with no cap or restriction on storage of conserved water. Any ICS water stored by IID should not be considered top water in the event of an overflow at Lake Mead/Lake Powell. While in this time of drought this is highly unlikely, we need to ensure our efforts are not wasted.	Imperial Valley Water (IVH20)	Stephen Benson
20913	34	ALTSTORE - Alternatives - Storage	A 2013 legal analysis by Larry McDonnel explored the concept, stating "There may be opportunities to put in place measures that would reduce the likelihood of a 75/10 shortfall such as using an accounting system to smooth out the annual variability of flows and even a relaxation of the requirement under certain circumstances82." Additionally, it's crucial that the Post-2026 NEPA analysis assess options for Upper Basin states to store water in Lake Mead in the form of an Intentionally Created Surplus (ICS). Similar ICS tools were essential in the 2007 Interim Guidelines and provided a framework and incentive for water users to conserve83. Some policy experts have recently argued that the Upper Basin's delivery obligation is unsustainable in a dwindling river system. If the delivery obligation is changed, the primary purpose of Glen Canyon Dam will change as well. As Eric Kuhn, former Director of the Colorado River Water Conservation District, said at the Getches Wilkinson Annual Summer Conference in 202384, "If the risk of a curtailment on the Upper Basin... is off the table, then the purpose of Lake Powell becomes very different". In an operational scenario where the Upper Basin is no longer required to release 75 million acre feet every ten years at Lee Ferry, the Upper Basin could then be allowed to count its delivery further downstream at Lake Mead. Even in amounts lower than 7.5 million acre feet, the omission of the delivery obligation would open up more flexibility to consolidate storage in one reservoir versus the other in an effort to minimize evaporative and seepage losses, and optimize environmental conditions in Glen Canyon and Grand Canyon. An accounting approach that prioritizes water storage in Lake Mead could offer flexibility to the system, encourage conservation in the Upper Basin, and may save 30,000-50,000 acre feet a year by avoiding higher ground-seepage rates in Glen Canyon85. Though such an idea was considered outside the scope of previous NEPA analyses, it is now essential to look at as one of the potential options considering the current and anticipated hydrology of the Colorado River.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	23	ALTSTORE - Alternatives - Storage	Storage and Voluntary Conservation The 2007 Guidelines provided a mechanism for the creation, accounting and delivery of ICS and other such voluntary conservation mechanisms. Such conservation and storage activities have increased the elevation of Lake Mead by 72 feet4 over what would have been in the Lake without these programs. They have further provided Contractors a mechanism for addressing water supply issues. Operational experience under the 2007 Guidelines points to a need for restructuring the ICS framework, including provisions for the creation, storage and delivery of conserved water, and assessment of evaporation and other losses on the conserved water. The Post-2026 Operations should consider impacts on other water users that may stem from storage and conservation mechanisms. Arizona would also require a framework for implementation of ICS or any other mechanism among Arizona Tribes and other Arizona water users, similar to the 2019 Arizona ICS Framework Agreement. If ICS or a similar mechanism is developed, CAWCD and Arizona would seek cooperation from the United States in a parallel process involving Arizona Tribes and water users. As noted above, alternatives in the EIS that contemplate the creation, storage and or delivery of conserved water must consider the appropriate forbearance mechanisms.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20925	11	ALTSTORE - Alternatives - Storage	As valuable as the Intentionally Created Surplus (ICS) program is to maintaining elevations in Lake Mead, the limited access to Lake Mead storage has stood as a barrier to those who could help support the river. Specifically, the Water Authority does not currently have a storage account despite meeting ICS participation requirements. The Water Authority has an entitlement to mainstream water under a water delivery contract with the United States, a reservation of water by the Secretary of Interior, and conserved water supplies that qualify under the ICS program parameters. Granting the Water Authority a Lake Mead storage account would have Basin-wide benefits, providing the potential for additional water within the Colorado River system to build elevation in Lake Mead and protect hydropower production and infrastructure. Locally, it would create additional operational flexibility for the San Diego County region. Considering such benefits, the Water Authority requests that Reclamation incorporate expanded access to the ICS program as part of the analysis.	San Diego County Water Authority	Dan Denham

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20936	7	ALTSTORE - Alternatives - Storage	The EIS should build off the successes of the 2007 Interim Guidelines, especially with respect to conservation programs. The EIS should further develop storage and conservation programs that maximize voluntary reductions in water use throughout the Colorado River Basin, including the aforementioned framework for augmentation of Colorado River water supplies. The EIS should evaluate existing mechanisms, such as intentionally created surplus ("ICS"), for voluntary conservation and storage to provide flexibility to individual contractors and protect the Colorado River System as a whole. Although the Community has voluntarily conserved nearly 320,000 acre-feet through ICS, the program's parameters should be reevaluated to ensure it properly incentivizes conservation while avoiding negative impacts to Colorado River water users.	Gila River Indian Community	Stephen Lewis
20945	7	ALTSTORE - Alternatives - Storage	2. Include mechanisms to rebuild depleted storage in both reservoirs and to protect storage into the future by considering actual hydrology and using targeted, short- term forecasting.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20946	5	ALTSTORE - Alternatives - Storage	This means that any mechanisms for voluntary conservation and storage, such as intentionally created surplus (ICS),4 must provide that any water stored in Lake Mead is junior in priority to the rights of PPR holders (i.e., a junior water user should not be permitted to use ICS to supersede the water rights of a more senior water user).	Yuma County Water Users' Association	James Auza
20955	1	ALTSTORE - Alternatives - Storage	Post-2026 Operations Should Provide for Increased Flexibility - As climate change continues to impact the availability of Colorado River supplies, water users will need increased flexibility to mitigate shortages and adapt. While strategies such as system conservation and Intentionally Created Surplus (ICS) have provided flexibility to the system and should continue, Reclamation should explore additional operational strategies in the Post-2026 operations.	Gilbert Arizona Public Works	Lauren Hixson
20963	11	ALTSTORE - Alternatives - Storage	iii. Consider various storage scenarios, including abandoning storage in Lake Powell, with management of these storage reservoirs based on hydrological conditions, not reservoir levels. These scenarios should explicitly consider impacts to existing environmental commitments, including habitat building flows in the Grand Canyon, the Lower Basin Multi-Species Conservation Plan, and Colorado River Delta restoration.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20965	12	ALTSTORE - Alternatives - Storage	[Solutions with regard to restoring Salton Sea ecosystem] Water from More Flexible Storage The Imperial Irrigation District (IID) has long sought to be given the right to store water in Lake Mead when IIDs use in a year is less than their allocation, an underrun. Under current law and practice, any IID water allocation that is not used within the year goes to the Metropolitan Water District of Southern California (MWD) at zero cost. However water use within a year that exceeds the IID allocation must be paid back in future years. This does not incentivize conservation at below allocation water use levels in the IID service area. Granting IID the right to future use of allocated water not used in a given year would incentivize conservation at lower use levels and would help build elevation in Lake Mead at this critical time and going forward. MWD would lose an occasional windfall, but would not lose its normal allocation of Colorado River water.	The EcoMedia Compass	Andrew McDonagh
20965	13	ALTSTORE - Alternatives - Storage	[Solutions with regard to restoring Salton Sea ecosystem] Water from Reducing Evaporation Loss The reservoirs on the Colorado River system are a very significant locus of water loss due to evaporation. For example Lake Mead is estimated to have lost on the order of 500 KAF to evaporation in the year 2020 (Reference 1, Page 22). One way to reduce evaporation loss that has been effective on smaller reservoirs around the world is to use floating covers on most or part of the water surface. Floating covers can reduce evaporation loss on reservoirs by 90% (Reference 2, Table 4). While Lake Mead, Lake Powell, Lake Havasu, etc. are extensively used for recreation, in a system shortage that threatens the operational integrity of the Colorado River system, there is good justification to reduce the area of recreational use to conserve water. For example, if recreational use of Lake Mead were limited to the most used 40% of the reservoir, and floating covers were employed on 60% of the surface area, then annual water savings would be on the order of 270 KAF, more than the 250 KAF annual reduction proposed for the Imperial Valley in California, without the substantial economic and environmental losses that would occur to the Imperial Valley and the Salton Sea. Based on Reference 2, Table 4, the cost would be ($0.30 / 1,000 L) / (0.0008107132 acre-feet / 1,000 L) = $370 per AF, which is well below the per acre foot amount proposed by the lower basin States under current negotiations to compensate for short term conservation now.	The EcoMedia Compass	Andrew McDonagh
20968	3	ALTSTORE - Alternatives - Storage	Upper basin states storage is limited in comparison to the lower basin states. The RWBCD shares that more upper basin storage would be beneficial to the Colorado River system primarily from an evaporation perspective. Evaporative losses in the lower basin far exceeds evaporative losses in the upper basin to the tune of million + acre feet of water per year that if stored in the upper basin would equate to significantly less evaporative losses while still providing benefit to the Colorado River system. The 1956 Colorado River Storage Project Act (CRSP) detailed several reservoir projects of which several have been constructed yet many have not that were outlined in the Act. The RBWCD recommends the CRSP be revisited particularly as it pertains to the storage in the upper basin states for new reservoir sights to construct and if these sights are no longer plausible then new reservoir storage sights be identified. You cannot conserve your way out of drought but you can use storage as a means to weather the storm as demonstrated by the lower basin states use of Lake Powell and Lake Mead with conservation as a tool to extend the life of a reservoir savings account. Without a reservoir safety net, the lower basin states would have been out of water. Then what?	Rio Blanco Water Conservancy District	Alden Vanden Brink

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20972	7	ALTSTORE - Alternatives - Storage	The Bureau should revise the regulation and processes governing the Intentionally Created Surplus ("ICS") system. However well-intentioned, the existing framework is prone to abuse and manipulation. If the system is continued under post-2026 operations, the Bureau should reform it in ways that better align it with the priority system and sound policy. In particular, ICS should be administered in alignment with the Law of the River so as not to disrupt the priority system. The guidelines developed in the post-2026 process should make it clear that the ICS program does not impact users with rights senior to those creating or taking delivery of ICS. Particularly important to the District arc the rules that apply in shortage conditions.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	8	ALTSTORE - Alternatives - Storage	The Bureau should consider an alternative under which it winds down the ICS system after 2026. The District recognizes that the ICS program has protected critical elevations in Lake Mead. However, the system is built around ICS creators retaining rights in "conserved" water, rather than engaging in true conservation that permanently reduces the burden on the River. At the.very least, the limits on each state's creation and storage of ICS volumes should not be increased, and ICS water should be charged evaporation losses in each year at a minimum rate of three percent from creation to withdrawal or depletion.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	9	ALTSTORE - Alternatives - Storage	The Bureau should consider the reform of the ICS program to be within the scope of its post-2026 process	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20985	3	ALTSTORE - Alternatives - Storage	The Bureau should also consider the Law of the River in the development of post- 2026 operational guidelines as they relate to intentionally created surplus ("ICS"). The continuation of the JCS program and the implementation of its framework cannot negatively impact other water users and should align with the priority system.	Bard Water District	meghan noblelaw.com; Ray Face
20993	3	ALTSTORE - Alternatives - Storage	3. Formalize and codify operating policies to ensure that UB-conserved water (DROA or DCP/DM) remains in Lake Powell; protect any water moved downstream from a CRSPA facility into Lake Powell for the purposes of infrastructure or hydroelectric generation, or any water conserved through DROA/DCP/DM measures, for its intended purpose, which is to ensure that the UB can meet future Compact obligations.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21301	10	ALTSTORE - Alternatives - Storage	As a conservation tool, Intentionally Created Surplus ("ICS") has proven beneficial. It has encouraged qualifying water users to conserve (store) water in Lake Mead to prop up levels to avoid shortages and helped avoid deeper shortages than otherwise might have occurred. The usefulness of the tool needs to be further analyzed by exploring the impact of delivery of ICS on the lake level, especially in times of shortage when requests for delivery are likely. Should ICS be deliverable Post 2026 if delivery shifts the lake to a lower elevation tier resulting in a shortage declaration? Additionally, clarity should be provided on the priority of ICS. Does it retain its original priority? Does it have a super-priority as conserved water because it was intentionally created? Is it protected from delivery to higher priority users in times of shortage? Without protection from delivery to other users, no incentive exists to create ICS. The lower priority water user would be better served to consume the water or store it underground affording no benefit to the system.	Mohave County Water Authority	Jamie Kelley
21301	12	ALTSTORE - Alternatives - Storage	Decisions on actions to protect Lake Powell's level should not be based solely upon elevations of Lower Basin reservoirs. Storage in Upper Basin Reservoirs should be taken into account when making decisions to protect elevations in Lake Powell. It is difficult to imagine Upper Basin storage has no impact on the level of Lake Powell. We understand and acknowledge the Upper Basin has governing documents for its operation, which must be respected. However, we believe Upper Basin storage should be considered when making decisions on Lower Basin operations to protect Lake Powell.	Mohave County Water Authority	Jamie Kelley

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21302	10	ALTSTORE - Alternatives - Storage	Operational Flexibility and Creative Use of Storage. A key strategy for managing water risk within the Colorado River can and should be the creative and flexible use of reservoir storage in a manner that benefits continued investments in water conservation and efficiency, co-investment in water supply solutions, and intra- and inter-state and international cooperation in managing water risk. Intentionally-Created Surplus and the Mexican Water Reserve represented a first step towards incorporating storage-based incentives within Reclamation's operating guidelines that created alternatives to the old paradigm of "use it or lose it." Reclamation has taken further steps towards the creative use of storage in its conjunctive management of Powell and Mead launched under the 2007 Guidelines, its modified Mead-Powell accounting that strategically held back water in Lake Powell to protect power heads, and through DROA releases. A next step should be the consideration of a broader range of activities that could creatively generate and utilize storage and incentivize participation. For example, the EIS could analyze creation of specific categories of storage and associated criteria that would be entitled to protection under the related Forbearance Agreement, instead of requiring individual approval of each ICS project within the exhibits to the Forbearance Agreement. It could also consider the potential for the creation of similar storage in Powell to open the same opportunities to Upper Basin users. More creative uses of storage could similarly include allowing Reclamation the flexibility to move certain types of stored water (like ICS) between Powell and Mead to meet other key operational priorities and requirements, such as protecting hydropower heads. It could anticipate the potential for such storage to be temporarily "moved" to other CRSPA reservoirs. It should include limits on withdrawals of storage under certain conditions to ensure that the utilization of storage does not damage other users. This could include some rethinking of the ICS rules, such as treating future ICS as "top storage" that does not count towards accounted storage volumes/elevations for purposes of determining the amount of water available for allocation under shortage rules. It should consider the re-creation of the federal ICS account considered in the 2007 Guidelines, potentially as a means to satisfy environmental minimums, protect hydropower, or meet other systemlevel needs without infringing on water deliveries.	City of Phoenix	Cynthia Campbell
21302	19	ALTSTORE - Alternatives - Storage	Storage. The EIS should include a clear accounting of reservoir storage space and utilization in the Colorado River Basin. For example, it should describe the Lake Mead storage account volumes and space utilized by entities with ICS, DCP ICS, etc. as well as the use and availability of storage in the Upper Basin reservoirs. Promoting a better understanding of storage within the Colorado River system can help stakeholders assess possible strategies to increase storage in the reservoirs and develop flexible storage arrangements. Reclamation's analysis should also include some assessment of the role of natural storage within the watershed, which also helps to support the resilience of the system against dry conditions (particularly for Upper Basin users). This analysis could help with the consideration of mitigation strategies, such as strategic investments in key watershed areas.	City of Phoenix	Cynthia Campbell
21302	29	ALTSTORE - Alternatives - Storage	As part of the NEPA analysis, Reclamation should evaluate the results of the multiple recent short-term system conservation efforts, as compared against approaches that focus on longterm investments in water conservation and demand management activities. System conservation has played a central role in managing short-term Lake Mead storage and limiting storage declines over the past decade, including in the System Conservation Pilot Program, Drought Contingency Plan, and 500+ Plan. Given the widespread adoption of these strategies, the 2026 Guidelines should anticipate the potential need for additional system conservation. However, other conservation approaches that create long-term gains or reduce users' dependence on the Colorado River are also going to be important to support longer-term system resiliency. For example, while system conservation may help to modestly reduce the probability that Reclamation will need to impose shortages in the immediate future, reduced dependence on the part of end users gives Reclamation greater flexibility by reducing the potential for Reclamation's future management actions and interventions- including all-butinevitable involuntary reductions and shortages- to produce disruptive or dangerous economic, social, and political consequences.	City of Phoenix	Cynthia Campbell
75	1	ALTSURPLUS - Alternatives - Surplus	Iâ€™ve loved boating on Lake Mead. I donâ€™t own a boat but Iâ€™ve been invited probably 5 times in my 30 years. Those 5 times have been some of the most fun Iâ€™ve ever experienced. Please change these rules to allow saving water in surplus years so we have water in our seasons of drought.		Chaz Clawson
561	2	ALTSURPLUS - Alternatives - Surplus	Take care of our water resources by saving and protecting water when we have good years like this year. We have the capacity to plan for the future, store a valuable resource and at the same time create a valuable recreation area.		Casey Glade
654	6	ALTSURPLUS - Alternatives - Surplus	Some future allocations must go to the reservoirs, even as the river continues its decline. Storage needs to be restored. The first years of any Â"surplusÂ" must all go to the reservoirs.	University of Arizona	Flessa, Karl W - (kflessa)
17992	1	ALTSURPLUS - Alternatives - Surplus	Itâ€™s common sense that in years of large snowpack and runoff, we should fill our reservoirs. We need common sense water management not complicated and mandatory water release amount. The winter of 2023 has been a record year for water, so we should be saving as much as possible in our reservoirs for potential drought years to come. Fill lake Powell and Lake Mead on years like 2023. The new rules going forward should have plans to fill our reservoirs when we have the water.		Scott Challis

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20481	22	ALTSURPLUS - Alternatives - Surplus	E. Surplus Criteria Although the likelihood of surplus conditions in the Lower Basin is minimal in the future, the Post-2026 EIS should consider alternatives that include criteria for distributing surplus in the Lower Basin.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20936	9	ALTSURPLUS - Alternatives - Surplus	Lastly, the EIS should consider alternatives that include criteria for distributing surplus in the Lower Basin. While the likelihood of experiencing surplus conditions in the future is unlikely, Reclamation should be prepared for such a possibility and develop clear criteria to appropriately manage the additional water supplies, with a preference for using these supplies to create "buffers" to reduce the impacts of periods of sustained low hydrology.	Gila River Indian Community	Stephen Lewis
20946	3	ALTSURPLUS - Alternatives - Surplus	Although the Colorado River Basin is currently in a shortage condition, there is a possibility that the basin may, in the future and during the term of the post-2026 EIS, find itself in a surplus condition. In that event, the Association believes that the Law of the River should also control the delivery of surplus flows.	Yuma County Water Users' Association	James Auza
20438	19	ANALYSIS - Resource analysis	7. Identify and analyze the full extent of benefits and impacts of potential operational and management actions on all Basin communities and resources.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20478	3	ANALYSIS - Resource analysis	Lastly, an analysis of the current priority of uses of Colorado River water is necessary to provide a clear direction into the future.	Lake Havasu City	Cal Sheehy
20478	10	ANALYSIS - Resource analysis	Meaningful Prioritization of Use The US Department of the Interior should reprioritize the uses of water. The 1928 Boulder Canyon Project Act lists the top four priorities for the purpose of Hoover Dam: flood control, Colorado River navigation improvement, water regulation, and power production. It is unclear why navigation was second priority as commercial navigable trade has not been obtainable with subsequent dam constructions. Renewable energy production in the United States is very important, water regulation, through this legislation, supersedes power generation and as long as water can flow through the dams, this fundamental resource should not be inhibited in the 2026 Operational Guidelines even for the sake of power generation.	Lake Havasu City	Cal Sheehy
20480	11	ANALYSIS - Resource analysis	Because the scope of the Post-2026 Operational Guidelines will likely be large, we recommend that Reclamation contemplate whether and how certain aspects could be staged, if appropriate. Having an understanding of certain elements, such as beneficial use criteria, conservation funding, and health, human safety and welfare limitations will help inform the total volume of mandatory reductions necessary and may provide a more successful framework for negotiating consensus.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman

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20489	14	ANALYSIS - Resource analysis	Affected Areas - The need to provide operational and planning stability as emphasized in the Scoping Notice involves more than considering possible operations and actions to implement. It also requires predictions of how the proposed alternatives would affect the human and natural environment. It is not enough to consider the comparative change in resource conditions among the proposed action alternatives. Rather, the impacts must be compared to a representative baseline condition in order to have context. In other words, to afford decision makers and the public an opportunity to understand and weigh the consequences of any proposed action and incorporate measures to avoid or mitigate them, the NEPA process for the post-2026 Guidelines must identify the baseline conditions for relevant resources and assess the full range of impacts to those resources as a result of taking no action or implementing any of the proposed alternatives. This includes, but may not be limited to, identifying the baseline status and assessing impacts for the following structural and resource categories: i. Hydrologic Resources: Water Storage and Supply (including groundwater interactions), Water Quality (Salinity, Temperature, Sediment, Oxygen, Algae/Nutrients, Metals, etc.); Flow rates and volumes along river reaches ii. Air Resources: Air Quality, Visual Resources iii. Land Resources: Geology, Sand, Soils, Watershed/Landscapes iv. Biological / Ecosystem Resources: Flora, Wildlife, Special Status Species, Habitat, Ecological Systems, Biodiversity, National Park/Monument Resources, Wildlife Refuge Resources v. Tribal Assets and Rights, Sovereignty, Self-Determination, and Resource Considerations vi. Socio-Economic Resources: Tribal, Urban, Rural, Municipal, Basin, Agricultural, Industrial, Recreational vii. Energy Resources: Power Supplies, Funds, Customers viii. Cultural/Spiritual Resources ix. Environmental Justice Considerations: See Executive Order 12898 x. Climate Change Considerations	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	20	ANALYSIS - Resource analysis	For each resource category the Bureau must determine what to evaluate. At minimum, the Bureau should make sure to include consideration of the benefits and effects as compared to baseline conditions of proposed operations and strategies on Colorado River water availability and the following: i. Ecological integrity and functionality within the Basin. This will require consideration of environmental co-benefits like carbon sequestration and flood attenuation, and how operations may affect, among other things, biodiversity, natural processes, watershed health, flows within key river reaches, and important aquatic habitats. This may be accomplished by, among other things, considering natural habitat of the region, direct flow metrics (e.g., average flow, peak flow, minimum flow, and water deliveries to Mexico, including flows to the Cienega de Santa Clara via the Main Outlet Drain), derived flow metrics (e.g., salinity, stream temperature, sediment transport), and resources-specific metrics (e.g., native and invasive fish, aquatic parasites, vegetation) that can pinpoint viability and vulnerabilities of ecosystem elements under the full range of conditions.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20963	9	ANALYSIS - Resource analysis	i. Identify, assess, and address the possible impacts not only to the operation of Colorado River reservoirs but also to the critical social, cultural, and environmental resources that define the river and its tributaries.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
21087	3	ANALYSIS - Resource analysis	to the extent any changes would limit the amount of water historically available to the [Colorado-Big Thompson] C-BT, such changes should be evaluated in light of their impacts on Colorado's South Platte River Compact obligations and Nebraska's corresponding rights.	Nebraska Department of Natural Resources	Thomas Riley
1	1	AQ - Air Quality	Air quality has been increasingly very unhealthy and will get worse covering over a 100 mile radius. This means that not just Riverside and Imperial counties but as far as LA, San Bernardino and Orange Counties will be impacted by residue from the sea as it dries creating lung disease for all those living in these counties. The economic impact will also be devastating. People will move further away, properties will go up for sale and no one will want to buy where they can't breathe. California will lose thousands of homeowners, businesses and simply tax paying residents.		Linda Joy Salas
17241	21	AQ - Air Quality	Other resource impact analyses should include (but not be limited to): - Impacts of fallowed agricultural lands, including dust emissions and public health as well as avian habitat loss;	National Audubon Society	Jennifer Pitt
20355	12	AQ - Air Quality	As part of the environmental review, management scenarios for the Colorado should be assessed in terms of the impacts on human health to nearby residents from increasing dust emissions in areas including the Salton Sea and the Delta as a result of decreased flows to those critical natural areas.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20385	5	AQ - Air Quality	Curtailments of water in certain areas can have significant economic impacts far beyond local and state economies. Other areas of analysis to incorporate include impacts on the infrastructure that supports local agricultural economies, as well as air quality and the repercussions associated with Environmental Protection Agency (EPA) particulate non-attainment areas.	Arizona Farm Bureau Federation	Ana Kennedy Otto

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20952	33	AQ - Air Quality	AIR QUALITY After establishing existing environmental conditions in the affected airsheds using attainment of National Ambient Air Quality Standards as a baseline, the EPA recommends evaluating and disclosing any air quality impacts associated with project alternatives and, if necessary, detailing mitigation steps that will be taken to minimize associated adverse impacts. The EPA is particularly concerned about exacerbating air quality problems around the Salton Sea. As mentioned above, climate change coupled with diminished agricultural return flows at its northern and southern edges could expose more than 11,000 acres of playa salt flats to wind erosion by 2030 with a 3- foot decline in water levels. Blowing dust, laden with concentrated waste and agricultural runoff, not only affects the ability to meet air quality standards but could also affect the respiratory health of people throughout the Imperial Valley, many of whom reside in disadvantaged and border communities. Discuss the air quality impacts of any operational changes that would reduce deliveries to the Salton Sea region, including a robust analysis of impacts to public health and safety of residents. Identify other areas that would have similar impacts throughout the project area.	Environmental Protection Agency Region IX	Robin Truitt
20965	4	AQ - Air Quality	Elevation Reduction Impacts A swift, sharp drop in Salton Sea elevation will result from major cutbacks. QSA transfers have already reduced the Salton Sea elevation by close to 12 feet since 2003 exposing tens of thousands of acres of lakebed. The lake could lose approximately another 30 vertical feet, exposing vast areas of lakebed sediments and becoming a source of fugitive dust. Air quality in the Coachella, Imperial and Mexicali Valleys is chronically impaired by multiple pollutants, especially particulate matter pollution (PM2.5 and PM10). Wind events and dust storms are a common occurrence in the Salton Sea region, causing high levels of PM10 to pollute the air. Public Health and Quality of Life Impacts of Elevation Reduction The Salton Sea region, consisting of Imperial County and Eastern Riverside County, is known for PM10 dust and PM2.5 particulate pollution. According to the International Journal of Environmental Research and Public Health and the California Department of Public Health, Imperial County is already challenged with the highest rate of asthma related emergency room visits by children aged 5-17 of any County in the State at twice the State average. Children often have to kept inside at home and at school due to poor air quality. Exposed Salton Sea lakebed has been shown to produce particulate pollution, particularly in the PM10 size range, sometimes causing complete whiteout conditions during high winds. Large areas of Salton Sea lakebed are composed of fine sediments that produce PM10 dust. Short term PM10 dust exposure exacerbates chronic respiratory conditions including asthma and bronchitis. Long term particulate exposure has been linked to lung cancer (Reference 6). The elderly are also part of the vulnerable population affected by the poor air quality. Thousands of residents in Imperial and Eastern Riverside County live in close proximity to the Salton Sea and are already at risk. The areas public health crisis will be exacerbated by lakebed exposure due to less water flowing into the Salton Sea.	The EcoMedia Compass	Andrew McDonagh
20965	5	AQ - Air Quality	Reduced water deliveries to Imperial Valley will negatively affect not only air quality, but the economy of the region. In 2020, the EPA declared Imperial County as no longer in violation of air quality standards and re-designated the County as in attainment for PM pollution. Imperial Valley was a non-attainment zone for many years. It took at least 2 years for the recent EPA re-designation. EPA premised this decision on the assurance that any future water transfers would include air quality mitigation measures. Loss of this attainment designation will cause a wide range of economic activities in the region, including agriculture and industry, to be restricted to make-up the loss. Airborne dust can also damage crops and the toxic components in the lakebed sediment blowing into crops is a concern for food safety.	The EcoMedia Compass	Andrew McDonagh
20965	8	AQ - Air Quality	The accelerated loss of elevation will consequently accelerate the exposure of potential PM10 dust emitting lakebed at the Salton Sea to 150,000 acres, see Chart 2 above, releasing far more PM10 dust into nearby lakeshore communities sooner than will happen with QSA transfers alone.	The EcoMedia Compass	Andrew McDonagh
651	5	CCGHG - Climate Change and GHG Emissions	With the current climate changes going on, the hydrology changes of the ground and a year or two of low snow pack, we could be right back to threatening dead pool levels again. Runoff is currently down to about 12.5 maf. With the continuing climate change this number is only going to continue to drop.		Steve Davis
782	3	CCGHG - Climate Change and GHG Emissions	The Colorado River not only needs to be "fixed," steps need to be taken - using Nature-Based Solutions - that are also "climate action" to mitigate, and allow adaptation to, climate change.	Save the Colorado	Gary Wockner
782	4	CCGHG - Climate Change and GHG Emissions	All climate science indicates that the Colorado River will likely have significantly and consistently lower flows in the future, perhaps mirroring some of the lowest hydrology on record, like 2021. You must prepare and manage for worst-case scenarios. We believe that the post 2026 Guidelines and Strategies must prepare for up to a 50% reduction in flow of water in the Colorado River by the year 2050, a mere 25 years in the future.	Save the Colorado	Gary Wockner
832	3	CCGHG - Climate Change and GHG Emissions	the river needs to be â€œfixedâ€ using Nature-Based Solutions that are also â€œclimate actionâ€ to mitigate, and create adaptation to, climate change that will further decrease flows in the future.		Gary Wockner
979	1	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Elizabeth Cerny

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1035	1	CCGHG - Climate Change and GHG Emissions	Please watch the video on Greening the Desert project where the country of Niger, similar to our southwest with only 6.5" of rain per year, has turned the country into a forest. The process is called FMNR, Farmer Managed Natural Regeneration. This could eliminate the drought issues of our southwest and allow for the current food industry, which is the main water drain in the region, to flourish without destroying the Colorado River natural beauty.		Gregg Neuendorf
1035	2	CCGHG - Climate Change and GHG Emissions	We seem to hide mitigation efforts like FMNR since it will solve climate change without a Green New Deal. These projects could impact the entire Colorado River watershed. Trees are the major influence to climate, not because of CO2 absorption, although this does store carbon as potential energy, but trees revitalize the water cycle and provide evapotranspiration to cool the region, more rain with fewer severe storms, and helping store tons of water undergrounds in massive root systems. Climate change is blamed for the damage to the southwest region when actually it is human land use abuse.		Gregg Neuendorf
1182	1	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Mary King
1294	2	CCGHG - Climate Change and GHG Emissions	With climate change we have to learn to work with Nature, not against it.		Hope Duchaine
1957	3	CCGHG - Climate Change and GHG Emissions	but also build climate resilience in the long term so that all of earth's creatures can survive.		Kimberly Hall
2022	1	CCGHG - Climate Change and GHG Emissions	The Post-2026 EIS is an opportunity to rethink water distribution and conservation in light of the aridification of the watershed		Chip Ward
2227	2	CCGHG - Climate Change and GHG Emissions	The water throughput of the Colorado River system is already grossly imbalanced and overdrawn. Decreasing precipitation and increasing evaporation with climate change will only increase this deficit, leading to ecological catastrophe for the living creatures clinging to the last scraps of water flowing through the Colorado and its tributaries		Jim Steitz
2285	2	CCGHG - Climate Change and GHG Emissions	Having lived for the past 25 years or so in the AZ desert, I am very aware of what Global Warming has done to the Colorado River. Frankly, it is shocking and most concerning for the future of hundreds of species of resident and migratory birds, as well as the millions of people still building and moving here.		Marilyn Leatherman
2302	1	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯ These birds are the 'canaries in the coal mine' - they indicate our own health and their condition must be considered a part of the overall picture.		CAROLYN DI LIBERTO
2355	2	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions that include federal funding, to help ensure these vital habitats continue to support the birds and other wildlife.		Susan Westervelt
2422	1	CCGHG - Climate Change and GHG Emissions	In addition, this issue is caused by Climate Change. Please do what you can to encourage legislators and your employees to do what they can to reduce carbon emissions.		Herb Huebner
2676	1	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.		Carole G. Whitehead
3147	1	CCGHG - Climate Change and GHG Emissions	Climate change needs to be addressed in an immediate way.		Julie Martens
3324	2	CCGHG - Climate Change and GHG Emissions	I urge the Bureau of Reclamation to ensure habitat for the critical plants, birds and other wildlife remains protected.â€¯ Not only does this add to the beauty for the many uses of the river, but it vitally protects our communities from climate impacts like wildfires. As climate change worsens, protecting the river becomes ever more urgent.		Joanne Keys
5973	1	CCGHG - Climate Change and GHG Emissions	Climate change is upon us and public policy can assist in the survival of our environment.		Cheryl Reijon

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7176	4	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure that these habitats continue to support the birds and other wildlife that depend on them.â€¯		Wendy Ebersberger
8754	1	CCGHG - Climate Change and GHG Emissions	As the world heats up, the rising temperature will melt permafrost, releasing methane trapped in the earth for billions of years. Methane, as you know, is 30X more damaging to the ozone layer than CO2. This will sharply accelerate climate change. We must end fossil fuel exploration & use.		Lana May
9087	1	CCGHG - Climate Change and GHG Emissions	The way I see it, as an agency that represents our democratically-elected government, you can either be part of the problem of climate change, or part of the solution. Please opt to be part of the solution - look forward!		Mary Smith
9222	1	CCGHG - Climate Change and GHG Emissions	I fear our children and all living beings are being deprived of a healthy future because of the climate crisis caused by us humans. We are inflicting devastating harm to the earth----its air, land, water and wildlife--- in multiple ways. The harm we have done to the Colorado River is just one example. The river, the lifeblood of the American West, is at risk of running dry because of human use.		Carolyn Petrakis
9289	1	CCGHG - Climate Change and GHG Emissions	This has to be dealt with now, climate change is here now, no time to waste!		Mercedes Franklin
9635	2	CCGHG - Climate Change and GHG Emissions	Especially as effort to prevent biodiversity loss, protecting habitat during climate warming is essential.		Catherine Decker
10576	1	CCGHG - Climate Change and GHG Emissions	I urge you to take a positive course of action on this and place this above other directons that you may be considering.		Elizabeth Elliott
10791	3	CCGHG - Climate Change and GHG Emissions	As climate change destabilizes the Colorado River system, I urge U.S. Bureau of Reclamation to understand how important environmental resources will change		Joseph Chlup
12848	1	CCGHG - Climate Change and GHG Emissions	I. Climate Change has and will continue to reduce streamflow in the Colorado River Basin Scientists concur that climate change has already increased global temperatures by 1.5 degrees C. They also agree that additional increases in CO2, methane and other climate warming compounds will further increase temperature with all of its associated impacts - in particular reduction in natural stream flow in the Colorado River Basin. In essence the last 23 years are simply a preview to what may occur if climate change continues to increase temperatures across the basin. Dr. Bass, now at UCLA, and team members simulated three conditions to identify the anthropogenic contribution to stream flow reductions in the Colorado River Basin and how plant responses to high CO2 may alleviate water losses. Note that higher CO2 concentrations may increase transpiration due to plant growth but may also reduce transpiration due to stomatal closure. Simulated conditions were; 1. current conditions including increased warming and CO2, 2. "pre-industrial" conditions without warming/CO2 increases and 3. current conditions where only CO2 increases. Their research goals included the following (page 3): * (a) evaluate how historical warming and the vegetation response to increases in CO2 have impacted runoff across the Colorado Basin from 1954 to 2021, * (b) provide detailed analysis for the prolonged drought (2000-2021) and the recent 2020-2021 drought, and * (c) quantify the runoff sensitivity (% degC-1) in snowpack versus non-snowpack regions. Results of these evaluations are many but in summary: * Stomatal closure in the high CO2 environment outweighed transpiration due to plant growth; reducing plant water losses. * Increased temperature and CO2 caused by anthropogenic climate change have reduced native flows in the Colorado River by 6.8% per degree C or by 10.3% since the pre-industrial times. * "Colorado Basin natural flows have decreased by roughly the storage of Lake Mead during the 2000-2021 mega-drought due to this long term anthropogenic influence." * The 2021 shortage would not have occurred without anthropogenic warming. * Warming has led to disproportionate aridification in snowpack regions. "Regions associated with snowpack show nearly double the runoff sensitivity to warming (-7.7% degC-1) compared to regions without snowpack (-4.0% degC-1)" Snowpack regions comprise 30% of the Colorado River basin area yet "86% of the runoff decrease is driven by water loss in the snowpack regions." The enormity of the above statement cannot be ignored. The water supply for millions of people, agriculture, and industry comes from snowpack in the high mountains of Colorado and climate change is disproportionately affecting the runoff efficiency of snowpack areas. Because temperature increases cannot be reversed in the short term, the 2026 negotiations need to revise water allocations to reflect lower Colorado River flows observed since 2000. There also needs to be some flexibility to the water allocations such that water users in the basin can adapt to extreme drought years where water deliveries will need to be curtailed.		Lisa Buchanan

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12848	3	CCGHG - Climate Change and GHG Emissions	As is, climate change risks fall entirely on the Upper Basin states. The Colorado River has only produced on average 12.2 MAF natural flows at Lees Ferry over the last 23 years. Inflow below Lees Ferry includes 0.8 MAF from Paria and Little Colorado Rivers, and springs in the Grand Canyon providing, on average, natural flows of 13 MAF to Lake Mead (Kuhn and Fleck, 2023) during this period. Based on the original 1922 compact and the 1944 Mexico treaty the Upper Basin has historically provided 7.5 MAF for the lower basin states use plus 0.73 MAF for Mexico or 8.23 MAF per year. In addition, the Upper Basin compact of 1948 allocates evaporative losses of approximately 0.8 MAF (in Lake Powell, Flaming Gorge, and Upper Basin Aspinall Unit) proportionately to each Upper Basin State. Thus the Upper Basin states have had historical obligations of 9 MAF. Upper Basin use has remained relatively constant at 4.5 MAF/year and due to drought negotiations the Lower Basin annual use has been reduced to 9.0 MAF after peaking at 12 MAF/year around year 2000 (Brad Udall presentation). Still, in the Millenial Drought, the Colorado River did not produce sufficient runoff to cover 1.5 MAF of system losses in the Lower Basin. Based on the SNWA estimates, these losses stem from 900,000 AF losses in Lakes Mead, Mojave, and Havasu plus 600,000 AF transit losses between Lake Mead and the Mexican border (Kuhn and Fleck, 2023). In some years following 2000 natural flows in the Colorado River Basin were much less than the 12.2 MAF average: 2018, 8.6 MAF; 2021, 7.2 MAF; average 2001 to 2004, 9.3 MAF with the lowest volume in 2002 at 5.9 MAF; average 2012 and 2013, 8.8 MAF (Brad Udall presentation). Low flows and continued over allocation of the river resulted in drastic reductions in the combined volume of Lakes Mead and Powell falling from 47 MAF (95% full) in January of 2000 to 13 MAF (25% full) in April of 2023 or on average, 1.5 MAF loss per year. Historical expectations of what the Colorado River can supply are not applicable to current and anticipated future climate conditions.		Lisa Buchanan
14729	3	CCGHG - Climate Change and GHG Emissions	As ongoing and significant climate change destabilizes the Colorado River system, I urge the Bureau to identify how important environmental resources will be affected and to invest in solutions, including federal funding, to protect these habitats so they continue to support the birds and other wildlife that depend on them into the future.		Wallace Elton
16143	2	CCGHG - Climate Change and GHG Emissions	Obviously, changes in water use in the West will have to be addressed as the climate changes.		Sue Ordway
16403	2	CCGHG - Climate Change and GHG Emissions	These habitats are also important in combatting global warming as trees help reduce temperatures.		Robert Brandt
16804	1	CCGHG - Climate Change and GHG Emissions	The previous two decades have make it obvious that the Post 2026 Guidelines must be scoped to consider a broader range of hydrologic extremes for future basin management. Taking this lesson seriously means that the Post 2026 Guidelines should be designed to manage the impacts of slow-moving, long-term aridification, punctuated with drought events that may be more severe or prolonged than previously predicted.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16821	3	CCGHG - Climate Change and GHG Emissions	3. Closely examine and address the existing impacts and potential future impacts of climate change on our water supply in the long term. It is well known that the region has gotten hotter and drier over the last century, and the Fourth National Climate Assessment indicates that our water resources could be diminishing even further in the next century. The post 2026 operational guidelines need to prioritize the kind of adaptability and flexibility that will be required to respond to our rapidly changing climate.		Teal Lehto
17236	5	CCGHG - Climate Change and GHG Emissions	Climate change has destabilized the Colorado River system. I urge the Bureau of Reclamation to first identify how important environmental resources will change, and then invest in solutions to protect and manage these resources.		Erin Peffley
17241	1	CCGHG - Climate Change and GHG Emissions	Reclamation needs to adopt Colorado River management that responds to both crises. Audubon urges Reclamation to consider that post-2026 Colorado River operating guidelines are fundamentally a component of regional adaptation to climate change. Colorado River Basin communities, economies, and ecosystems need to become more resilient to climate impacts. This will require large-scale efforts.	National Audubon Society	Jennifer Pitt
17241	3	CCGHG - Climate Change and GHG Emissions	1. Climate change will continue to erode the stability of the Colorado River water supply. Developing new management rules requires consideration of the hydrologic extremes that may be generated by the changing climate, and that these extremes are likely to evolve over time.	National Audubon Society	Jennifer Pitt
17241	27	CCGHG - Climate Change and GHG Emissions	Other resource impact analyses should include (but not be limited to): - Emissions of carbon and other gases driving climate change; and	National Audubon Society	Jennifer Pitt
17405	2	CCGHG - Climate Change and GHG Emissions	Despite their significance, we have watched with growing concern as the water levels of these lakes have steadily declined over the years due to ongoing drought and climate change. The impact of this decline is being felt far beyond the lakes' shores, affecting a wide array of industries that depend on these water bodies, from tourism and recreation to hospitality and services.		Joshua Haiges
18214	1	CCGHG - Climate Change and GHG Emissions	it is clear that global warming is bringing increased pressure on water supplies in general in the dry West, and the Colorado must be maintained for important use.		Elizabeth Long

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20328	2	CCGHG - Climate Change and GHG Emissions	* The scope of the environmental review must include the full range of potential climate change impacts on Colorado River hydrology.	Comite Civico Del Valle	Max Gomberg
20357	2	CCGHG - Climate Change and GHG Emissions	3. Proactively address the existing impacts and future impacts of climate change on the Colorado River.		Dylan Mori
20417	5	CCGHG - Climate Change and GHG Emissions	2. Basin policies must reflect the fact that there is less water in the river today, and there will be less water in the river in the future due to a warming, drying climate. These policies must be flexible and proactive, and equitable and sustainable for all states, sovereigns, and stakeholders.	Western Resource Advocates	Bart Miller
20417	11	CCGHG - Climate Change and GHG Emissions	WRA's comments are based on the fundamental point that there is a need for action driven in large part by climate change.	Western Resource Advocates	Bart Miller
20438	1	CCGHG - Climate Change and GHG Emissions	First, we would like to thank the Bureau for acknowledging the serious situation we face as a Colorado River Basin community. As we work with the Bureau to develop river policy that will govern in years to come, it is imperative that we acknowledge that the river has never had the volume originally apportioned under the 1922 Colorado River Compact, that the current volume is declining rapidly, and that we may never return to the flows that we have been accustomed to experiencing in previous decades.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	5	CCGHG - Climate Change and GHG Emissions	Ethic Toward Resilience: The future of the Colorado River and its tributaries depends on whether the Basin can adapt and adjust to the hotter, drier, and more extreme climate conditions confronting the Basin. To be successful, future management strategies and operations must incorporate resilience principles that focus on using modern science as well as Indigenous Knowledge to establish the sustainable use of the Colorado River and its tributaries for people and the rest of nature for years to come.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	11	CCGHG - Climate Change and GHG Emissions	4. Develop strategies that contribute to the Basin's resilience to unpredictable water futures in order to guard against Colorado River system failures in a manner that protects ecological, spiritual, and cultural values; 5. Plan to minimize the vulnerability of the Colorado River water supply and of ecological, spiritual, and cultural resources; and	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	15	CCGHG - Climate Change and GHG Emissions	3. Respond to the realities of a changing climate and the resulting hydrology;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20465	5	CCGHG - Climate Change and GHG Emissions	The climate challenges we have subsequently faced call for more expansive and creative strategies to help basin water users transition to a warmer and drier climate.	California Department of Water Resources	Karla Nemeth
20465	7	CCGHG - Climate Change and GHG Emissions	The post-2026 guidelines need to better reflect post-2026 climate expectations, which generally entail warmer and drier conditions with less frequent wet periods but infrequent wet extremes that may be very extreme.	California Department of Water Resources	Karla Nemeth
20490	16	CCGHG - Climate Change and GHG Emissions	NPS suggests the term 'aridification' rather than 'drought' would be more accurate when discussing climate change in the Colorado River basin. The best available science illustrates that the western United States is experiencing a trend of increasing temperatures, evaporation, and soil drying. The Colorado River basin is experiencing a shift in system variability characterized by fewer years of high inflows, reduced average flows, and more frequent years with extreme low flows (Bedri and Piechota 2022, Salehabadi et al 2022, Pokharel et al 2022, McCoy et al 2022, Whitney et al 2022). It is important to use accurate terms that convey to the public, basin states, Tribes, and other government agencies that aridification is a rapidly developing and likely permanent change (at least through the 21st Century) toward a more arid climate in the southwestern United States. The current climate regime is not a temporary situation likely to return soon to the wetter conditions of the past century.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20496	6	CCGHG - Climate Change and GHG Emissions	While the winter of 2023 has brought relief to the Colorado River Basin and bolstered its reservoirs, the latest scientific models show that it would take 4-5 abnormally wet winters for Powell and Mead to fully recover. And that still does not consider the evaporative effects of climate change and increasingly warm temperatures that exacerbate evaporation. As I write this, global summer temperatures are the highest ever recorded. There is no way of knowing what the next few winters will be like. What we do know with great certainty, is that drought is a consistent and constant threat across the Colorado River Basin. A management plan for the Colorado River post-2026 needs to take into account the actual quantity of water in the Colorado River as well as the scientific models which suggest a continued reduction in the Colorado Rivers flow because of factors related to climate change (here).		Morgan Sjogren
20496	10	CCGHG - Climate Change and GHG Emissions	The Post-2026 EIS must consider the last 20 years of drought, the worst in the last 1,200 years, and the realities of climate change in its long-term management of the Colorado River. Like efforts to reduce carbon emissions to slow climate change, adapting to the current conditions will take time and an alteration of our current systems.		Morgan Sjogren
20599	5	CCGHG - Climate Change and GHG Emissions	BOR needs to strongly consider the needs of recreational users and use this platform as a way to encourage the development of cleaner alternative fuel uses for marine motors, such as natural gas and hydrogen.		David Larson
20624	4	CCGHG - Climate Change and GHG Emissions	Use more dramatic terms than "Long term drought". Regional drying from climate change is a physical reality. Language matters.		Steve Munsell
20700	47	CCGHG - Climate Change and GHG Emissions	III. CLIMATE RESILIENCE PLANNING IS CRITICAL. In a parallel timeframe to the post-2026 guidelines, Reclamation must continue to conduct additional climate resilience planning and implement solutions.	Grand Canyon Trust	Jen Pelz
20733	2	CCGHG - Climate Change and GHG Emissions	Drought and climate change need to be factored into the future management TO sustain the reservoir for the american public and the infrastructure that was built to provide critical power, and recreation.		Jake Schoppe
20899	23	CCGHG - Climate Change and GHG Emissions	4. Enlist the National Academy of Sciences to run focus groups regarding climate adaptation strategies and environmental effects of operations. 5. Enlist the Center for Climate Adaptation Science and Solutions (CCASS) at the University of Arizona to partner on the development of strategies that attract sustainability solutions.[5]	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	34	CCGHG - Climate Change and GHG Emissions	b. Modeling for global temperature increases in the 21st century Present-day monitoring data of carbon molecules hovering in the atmosphere clearly indicates that, since the first Conference of the Parties (COP) held in Germany in Year 1995, absolutely no progress has been made to reduce or sequester global carbon emissions.10 Therefore, the work completed for 2007 to demonstrate possible reductions in temperatures for scenario planning between 2005 and 2060 was not helpful to the formulating the 2007 Interim Guidelines, nor to the public. Optimistically, we propose the following criteria for scenario planning: 1. Scenario One (the control): The business-as-usual trend of rising temperatures that continue unabated to Year 2101. 2. Scenario Two: The trend actually stabilizes by Year 2051. 3. Scenario Three: The trend begins to reverse itself by Year 2081. The above example is a plain language approach, which is necessary because previous narratives and graphics for the public consumption of this information was either too vague or too busy. The writers of this NEPA process should explain to the public that efforts to reduce greenhouse gases and cool the atmosphere and ocean have lag times that last many centuries. Consider, for example, that the temperature regimes of the Medieval Warm Period and the Little Ice Age were persistent for time periods that lasted three to four centuries.[5] In other words, we need to accept that the negative impacts of climate change will not reverse in this century, i.e., that the ocean will continue to rise and the Arctic tundra will continue to thaw.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	36	CCGHG - Climate Change and GHG Emissions	ADDRESS SYSTEM VULNERABILITIES AND IMPLEMENTING CLIMATE ADAPTATION STRATEGIES Center for Climate Adaptation Science and Solutions (CCASS) Beginning in October of 2017, several science meetings were convened at CCASS at the University of Arizona at Tucson, and convened by its director, Professor Kathy Jacobs. The 35 scientists (including Reclamation staff) that were convened for this gathering articulated the system's vulnerabilities in great detail. In many ways, their report may be the best scoping document for the Post-2026 EIS, and this document is linked below for your convenience and this document will be submitted for the administrative record. Reference: Colorado River: Building a Science Agenda; Final Workshop Report; Sponsored by the National Science Foundation Award Number 1644884, and the Janet Quinney Lawson Foundation; Oct. 10-12, 2017. http://www.riversimulator.org/ Resources/University/CCASS/October2017ColoradoRiverWorkshopReport.pdf	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20904	5	CCGHG - Climate Change and GHG Emissions	The EIS should provide a reasonable assessment of environmental trends including climate change effects.		Craig Morgan; Mike Abatti; James Abatti
20945	1	CCGHG - Climate Change and GHG Emissions	1. Acknowledge that climate change is real, and include operations for a drier, more variable future that adapt and respond to actual hydrology.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20952	4	CCGHG - Climate Change and GHG Emissions	* Include a strategy to increase management flexibility, enhance climate adaptation planning, and improve infrastructure resilience.	Environmental Protection Agency Region IX	Robin Truitt
20952	13	CCGHG - Climate Change and GHG Emissions	Climate Adaptation Strategies The EPA supports the inclusion of the analysis proposed in Reclamation's April 20, 2023 Climate Change Adaptation Strategy6 (Strategy) for the Draft EIS in order to inform the alternatives, the public, and decision-makers. The Strategy includes objectives to increase water management flexibility; enhance climate adaptation planning; improve infrastructure resilience; and expand information sharing. The Strategy suggests increasing early-phase engagement with interested parties on climate change and inclusion of quantitative climate change analyses in environmental reviews. In the Draft EIS, discuss Reclamation's commitment to continue coordination with states, tribes, local interested parties, and Mexico to implement policies, programs, and practices across all sectors - agricultural, municipal, and power - to develop strategies and operational guidelines that respond to climate variability and reduce overall demand. While increased flexibility will be needed to avoid crisis responses, the EPA recommends that Reclamation consider the need to make contingency and conservation measures or contract modifications mandatory or permanent to provide more certainty to water users. In the Draft EIS, analyze and disclose climate impacts and vulnerabilities, the efficacy of conservation and efficiency measures, and any management actions that have been taken to date to prevent or slow the progression of climate impacts. The EPA recommends that the Draft EIS clearly describe adaptation planning efforts, and how additional minimization, mitigation, or management measures are integrated into adaptation planning commitments to achieve sustainable development and provide access to water vital to public health and safety. The EPA recommends that the Draft EIS identify where additional delivery or aquifer recharge infrastructure is needed and whether maintaining or replacing aging infrastructure will improve water and energy efficiencies and protect public assets.	Environmental Protection Agency Region IX	Robin Truitt
20952	17	CCGHG - Climate Change and GHG Emissions	Climate Change Guidance on Greenhouse Gas Emissions On January 9, 2023, the Council on Environmental Quality published interim guidance11 to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. CEQ developed this guidance in response to Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance is currently in effect; CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in progress, as agencies deem appropriate, to consider alternatives or help address comments raised through the public comment process. EPA recommends the Draft EIS apply the interim guidance to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. EPA is aware that greenhouse gas emissions can be produced by dam and reservoir operations. In the Draft EIS, estimate these emissions, particularly the amount of methane emissions released by algal blooms and vegetative decomposition caused by reservoir fluctuations either seasonally or by hydropower-ramping cycles.12 We recommend the details of the calculations of GHGs be included as an 10 See online platform https://www.epa.gov/waterreuse/national-water-reuse-action-plan-online-platform?action=2.19 11 https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on- consideration-of-greenhouse-gas-emissions-and-climate 12EPA (2023). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. U.S. Environmental Protection Agency, EPA 430-R-23-002. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2021. appendix to the Draft EIS so that the assumptions are adequately documented and the calculations can be replicated. Increases in GHG emissions could also result from alternative fossil fuel power sources if hydroelectric power is reduced or unavailable due to lower reservoir levels. Discuss how reservoir elevation changes at Lake Powell and Lake Mead affect hydropower production at the Glen Canyon, Hoover, Parker, and Davis powerplants, and which energy alternatives would likely replace these power sources should they lose capacity. Discuss how GHG emissions could increase if this power were to be replaced by fossil fuel energy sources. In 2021, the United States set a target to create a carbon pollution-free power sector by 2030 as an important part of reducing U.S. greenhouse gas emissions 50-52% from 2005 levels and achieving a net zero emissions economy no later than 2050.13 It would be useful for the public to understand how hydropower helps to meet these targets and what the percentage of the power generated is, or could be, provided by the Glen Canyon, Hoover and Lower Basin dams within the 11-state Western Interconnection regional portfolio.14 The EPA recommends that relative changes in reservoir levels under each alternative be discussed in the context of reducing greenhouse gas emissions and achieving power sector targets. Discuss the current regional capacity to replace hydroelectric power with other renewable energy sources like solar or wind power.	Environmental Protection Agency Region IX	Robin Truitt
21150	1	CCGHG - Climate Change and GHG Emissions	The guidelines and strategies used in the past are no longer appropriate given the change in climate towards a hotter and more arid basin. The EIS should address that changing reality.		Cole Paffett

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21155	3	CCGHG - Climate Change and GHG Emissions	3. Address the existing impacts and potential future impacts of climate change on the water supply in perpetuity.		Dylan Mori
21163	4	CCGHG - Climate Change and GHG Emissions	3. Closely examine and address the existing impacts and potential future impacts of climate change on our water supply in the long term. It is well known that the region has gotten hotter and drier over the last century, and the Fourth National Climate Assessment indicates that our water resources could be diminishing even further in the next century. The post 2026 operational guidelines need to prioritize the kind of adaptability and flexibility that will be required to respond to our rapidly changing climate.		Madeline Cronin
21167	5	CCGHG - Climate Change and GHG Emissions	3. Closely examine and address the existing impacts and potential future impacts of climate change on our water supply in the long term. It is well known that the region has gotten hotter and drier over the last century, and the Fourth National Climate Assessment indicates that our water resources could be diminishing even further in the next century. The post 2026 operational guidelines need to prioritize the kind of adaptability and flexibility that will be required to respond to our rapidly changing climate.		Teal Lehto
21302	13	CCGHG - Climate Change and GHG Emissions	Climate Impacts. To move past our recent history of lurching from crisis-to-crisis in the management of the Colorado River system, the scope of Reclamation's analysis should consider a broad range of reasonably foreseeable climate impacts that could intersect with Colorado River operations, including impacts to (1) the affected environment and (2) the proposed action, and (3) the alternatives. !t should also analyze adaptation measures to address those impacts. Climate change is causing significant shifts in weather patterns which is stressing the Colorado River Basin in ways that go well past the levels of runoff that we see each year. The Basin is not only experiencing drought but also aridification-long-term warming and drying. The trend is expected to continue, adversely affecting water availability, water storage, air quality, human health, agriculture, energy production, ecosystem function, biodiversity, and the overall resilience of the system as a whole. Climate change can also be expected to exacerbate environmental justice issues for the communities most vulnerable to climate-related health effects. Advances in technology, science, and modeling since 2007 have made information and projections of potential climate-related impacts broadly available, and these should be included in the NEPA analysis. Climate impacts that should be analyzed include the following and related impacts on the environment and human communities: increasing temperatures; risks of longer and more frequent heat waves; increasing evaporation; changing precipitation patterns; changing runoff patterns; dust on snow; and wildfires. The analysis should also consider potential resource-related impacts in both the Upper and Lower Basin including the following: water availability; natural (e.g., wetland) and artificial (e.g., reservoir) storage; water distribution infrastructure; water treatment infrastructure; hydropower capabilities; agricultural crop requirements; natural resources (wetland, forest, soil, vegetation, etc.); biological resources; and wildlife. 1 The CRBPA states: "In order to comply with and ca rry out the provisions of the Colorado River Compact, the Upper Colorado River Basin Compact, and the Mexican Water Treaty, the Secretary shall propose criteria for the coordinated long-range operation of the reservoir constructed and operated under the authority of the Colorado River Storage Project Act, the Boulder Canyon Project Act, and the Boulder Canyon Project Adjustment Act." Colorado River Basin Project Act of 1968 602(a).	City of Phoenix	Cynthia Campbell
Form 7	-	CONSCULT - Consultation tribal related	Include Colorado River Basin Tribes, who have long been denied access to their fair share of water, in decision-making and ensure that they have equitable access to water.	Western Resource Advocates	
11	1	CONSBIO - Consultation biology/ESA related	Must consult the Us. Fish and wildlife service about the biological opinions for the above-mentioned Federal dams in the upper Basin. I also take an analysis by the Fish and Wildlife Service should include an updated biological opinion for the Multi Species Conservation program in the reaches of the lower basin below Hoover dam on the issue of providing robust and adaptive considerations.	Living Rivers	John Weisheit
8665	1	CONSBIO - Consultation biology/ESA related	Critical habitate must be protected in the Colorado River watershed		Hal Enerson
17241	20	CONSBIO - Consultation biology/ESA related	Other resource impact analyses should include (but not be limited to): - Ability of water users to comply with requirements of the Endangered Species Act;	National Audubon Society	Jennifer Pitt
17241	42	CONSBIO - Consultation biology/ESA related	In addition, Reclamation's analysis should include use of metrics that evaluate how various management options impact freshwater-dependent habitats and vulnerable communities including: * Upper Basin River habitats, including metrics for spring peak flows and fall base-flows; * Grand Canyon habitats, including metrics for annual, minimum, and maximum flows; * Lower Colorado River habitats by reach, including metrics used to establish "covered" conditions in permits obtained through the Lower Colorado River Multi-Species Conservation Program; * Salton Sea habitats and environmental justice concerns, including inflows, water quality, lake levels, areas of exposed playa, and dust emissions; and * Cienega de Santa Clara habitats, based on changes in the quantity and quality of water the United States delivers to these habitats via the MODE canal.	National Audubon Society	Jennifer Pitt

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20355	11	CONSBIO - Consultation biology/ESA related	Existing recovery programs, such as the Lower Colorado River Multi-Species Conservation Program, should be reviewed and likely expanded to ensure that diminished flows do not further compromise species and habitat targets. The Post-2026 analysis should quantify and account for the impacts of reduced river flows, shallower reservoirs, and evaporation on water temperature and salinity concentrations, and their associated impacts on both instream aquatic life and off-stream beneficial uses. Reclamation and other federal agencies should also commit to the long-term protection of all Colorado River basin associated ecosystems, with restoration targets for success and milestones, such as the Salton Sea and the remnant Colorado River delta, that will suffer as contractors reduce their water use unless protective steps are taken concurrently.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20417	24	CONSBIO - Consultation biology/ESA related	Substantively, WRA shares an interest with the Basin Tribes to protect, improve or enhance river assets, including through the Lower Basin Multi-Species Conservation Program and Glen Canyon Dam Long-Term Experimental Management Program.	Western Resource Advocates	Bart Miller
20431	6	CONSBIO - Consultation biology/ESA related	The Lower Colorado River Multi-Species Conservation Program ("LCR MSCP") serves as an important environmental mitigation mechanism for native species, including many currently listed under the Endangered Species Act ("ESA"), and their habitats through the implementation of a habitat conservation plan. The LCR MSCP participants rely on the program to meet their compliance obligations under the ESA, and the wildlife protected by habitat created under the program rely on water delivered from Lake Mead to the Lower Basin and Mexico. Impacts to that program should be analyzed as part of any reductions in flow and changes to release volumes proposed as part of the Post-2026 operational guidelines.	Salt River Project	Leslie Meyers
20481	7	CONSBIO - Consultation biology/ESA related	Reconsultation with the Fish and Wildlife Service regarding the Multi-Species Conservation Program in the Lower Basin must occur simultaneously with the Post-2026 EIS process.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	6	CONSBIO - Consultation biology/ESA related	ii. Metrics for evaluating post-2026 operational and management strategies must be able to assess impacts to: habitats managed for endemic and endangered species including the tributary flows in the Upper Basin, the Upper Colorado River Basin and San Juan Recovery Implementation Programs, and the Lower Colorado River Multi-Species Conservation Program; the Grand Canyon; National Wildlife Refuges on the Lower Colorado River; the Salton Sea; the Cienega de Santa Clara; and habitat values of irrigated agriculture (which provides forage in many locations where native vegetation has disappeared).	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	15	CONSBIO - Consultation biology/ESA related	ii. Effective recovery programming and species protection. Programs like the Upper Colorado River Endangered Fish Recovery Program, San Juan River Basin Recovery Implementation Program, and Lower Colorado River Multi-Species Conservation Program (LCR MSCP) will be important to the overall functionality of the river system as it continues to experience changes due to climate conditions. It will, therefore, be important to identify how the post-2026 Guidelines will implicate these programs and provide opportunity to apply innovative solutions that accommodate continued protection, mitigation, and recovery of species and habitats at a broad scale within the Colorado River Basin. For example, the LCR MSCP partners require a secure water supply for the existing MSCP habitat sites to fortify the federal - and state and water user - responsibility to the dozens of native and imperiled species, even as diversions from the river are reduced. The post-2026 NEPA analysis should identify the effects of alternative actions on the LCR MSCP program and identify the path that will be followed to develop additional sites as needed and to secure sufficient water supplies or mitigate the effects of a reduced water supply to assure Lower Basin consistency with the ESA going forward. Similar considerations for ESA compliance in the Upper Basin will need to be developed for any Upper Basin operations that fall within the scope of actions for the post-2026 process.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	10	CONSBIO - Consultation biology/ESA related	Threatened and endangered fish and wildlife species are further protected under the Endangered Species Act and will require focused attention.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20899	6	CONSBIO - Consultation biology/ESA related	The scope of the Endangered Species Act consultation for the post-2026 operational guidelines must also consider all of the impacts of dam operations. Reclamation must consult with US Fish and Wildlife about the Biological Opinions for all the above mentioned federal dams in the upper basin as well as all operations affecting the lower basin species--the whole of the Colorado River and its tributaries that are affected by BOR operations. This would include, for example, an updated Biological Opinion for the Multi-Species conservation program in the reaches of the Lower Basin below Hoover Dam.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	10	CONSBIO - Consultation biology/ESA related	c. Adaptive Management and Mitigation for Upper Basin Fish: ESA Consultation for the post-2026 operations should include all 5 dams--consolidating the issues regarding listed fish in one consultation and Biological Opinion. Adaptive management structure has not achieved desired outcomes and the RIPRAP for fish protection in Upper Basin is opaque to the public. If management of all 5 dams (Hoover, Glen Canyon, Flaming Gorge, Blue Mesa, and Navajo) is consolidated together (which we suggest) with a comprehensive Biological Opinion, Reclamation may not need the separate RIPRAP decision-making structure and the required actions to support survival and recovery of listed fish would be more clearly defined and more transparent to the public.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20919	28	CONSBIO - Consultation biology/ESA related	d) Endangered Species Act (ESA) Consultation Reclamation must work with the U.S. Fish and Wildlife Service and the state parties to reconsult under Section 10 and Section 7 of the ESA for the Lower Colorado River Multi-Species Conservation Program simultaneously with the Post-2026 EIS process.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20952	27	CONSBIO - Consultation biology/ESA related	In addition, discuss the impacts of the alternatives on sensitive or ecologically diverse areas that depend on Colorado River water, including consistency with the Lower Colorado River Multi-Species Habitat Conservation Plan and the effects upon the Salton Sea. Address the prolonged drought that has prompted major reductions in water deliveries to the Imperial and Coachella Irrigation Districts and the transfer or sale of their water supplies away from agriculture toward cities in coastal southern California (Los Angeles and San Diego). Describe the ecological and temporal ramifications of any proposed reductions in water on migratory birds, fish, and wildlife populations, and how reductions may affect state and federal efforts to create or restore wetlands and wildlife habitat in the area. Address how restoration projects, as well as proposed lithium development in the Salton Sea region, may require augmentation of water supplies from the Pacific Ocean, the Sea of Cortez, or from reuse in Tijuana, Mexico and what direct, indirect, and cumulative effects may be attributed to imported water into the system.	Environmental Protection Agency Region IX	Robin Truitt
20973	2	CONSBIO - Consultation biology/ESA related	In Wild Fish Conservancy v. Salazar, 628 F.3d 513 (9th Cir.2010), the Ninth Circuit held that the Service must identify when a species will likely pass the tipping point for recovery and determine whether a proposed action will cause any species to reach that tipping point. That case, and subsequent cases addressing "tipping point," involved challenges to BOs that analyzed the effects of project-specific Federal actions. Reclamation's EIS represents an action which will provide program management direction and guidance and may or may not authorize future project-specific actions or activities that may result in adverse effects to threatened or endangered species and/or their designated critical habitat. As such, the Service will require certain key pieces of information to evaluate the tipping point for recovery of any species offered protections under the ESA within the geography of this EIS. The recovery planning that the Service has accomplished thus far for the species of the Colorado River can be found on the Service's website (https://ecos.fws.gov/ecp). This information will serve as a starting point for analysis of tipping point. While the Service cannot predict the full outcome of this EIS, it is clear given continued drought, aridification of the basin, and water demand on the system, there will be less water. What is not clear is how much water and of what quality will be available under the operating conditions the EIS will analyze. It will be important that the EIS adequately analyzes and describes water quality and quantity associated with different alternatives so we can understand potential impacts to species and habitats.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	3	CONSBIO - Consultation biology/ESA related	Additionally, in previous consultations on the LCR MSCP and LTEMP, Reclamation has employed different methods for addressing take of species. As we will be looking at combined operations in this EIS and section 7 consultation process, the Service requests that Reclamation utilize the same or similar types of information and impacts analyses to help clarify and create a transparent tipping point and jeopardy analysis for the combined operations.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk

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20973	20	CONSBIO - Consultation biology/ESA related	The LCR MSCP partners and the Service have a long-standing partnership throughout its first 18 years of implementing the program. This State, Federal and Tribal partnership of 57 entities will be maintained through the early coordination process that ensures a successful section 7 consultation and issuance of the section lO(a)(l)(B) permit (Habitat Conservation Plan). As part of Reclamation's EIS project planning, please ensure coordination and scheduling to accommodate the Section 7 and 1O(a)(l)(B) issuance timeline. The Service will be running a parallel Section 7 consultation, NEPA/EIS, Tribal Consultation, and financial assurances analyses, as required by the amendment and issuance criteria of the lO(a)(l)(B) permit.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	21	CONSBIO - Consultation biology/ESA related	The LCR MSCP provides necessary conservation for 27 ESA listed and sensitive species and is the custodian of over 8,100 acres of conservation properties. Water delivery and maintenance of these areas are important to species and associated habitats for over 400 miles of river. Re examination of the efficacy of LCR MSCP actions and current baseline conditions will be crucial in setting the stage for a full analysis of impacts under the ESA. Although there is a daunting task in front of us, we are confident in our partnership to provide appropriate conservation to collectively work towards maintenance and recover of our most sensitive species and ecosystems	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
21302	25	CONSBIO - Consultation biology/ESA related	The scope of the analysis should include an analysis of impacts to endangered species efforts and habitat programs and cultural resources. The new 2026 Guidelines could have important implications for a range of programs in the Basin including the Upper Colorado Endangered Fish Recovery Program, San Juan River Basin Recovery Implementation Program, Glen Canyon Dam Adaptive Management Program, and Lower Colorado Multi-Species Conservation Program. Changes in water flows and reservoir declines can also have important cultural impacts, such as changes in recreational opportunities and impacts to exposed cultural sites.	City of Phoenix	Cynthia Campbell
13	1	CONSCULT - Consultation tribal related	It appears to an outsider that the Bureau has run rough shot over a couple of Indian communities, and I would certainly like to see that cease.		Michael Carpenter
2737	1	CONSCULT - Consultation tribal related	Take into account the native American people who also depend on the river. In the past they have been marginalized in deciding on the river use.		Curtis Peacock
12813	3	CONSCULT - Consultation tribal related	Have Native Americans decide the total amount of water that can be extracted from the Colorado River each year.	Oceanforesters	Mark Capron; Mohammed Hasan
13108	1	CONSCULT - Consultation tribal related	Assist the Tribe with funding or technical assistance to provide access to clean drinking water for its tribal members that do not have plumbing to access that clean drinking water. 2. Fund new opportunities for tribes to participate in water conservation programs. 3. Fund the San Juan River Recovery Implementation Program to maintain and enhance the federal Endangered Species Act (ESA) recovery, which would assist the Tribe in [...] The Bureau of Reclamation's trust responsibility to tribes, including the Southern Ute Indian Tribe, requires Reclamation to ensure that tribes are included in the development of the Post-2026 operational guidelines for Lakes Powell and Mead. The Tribe urges Reclamation to take the lead in bringing tribes to the table during negotiations between the state and federal teams, so the tribes can respond to the suggested rules, policies, guidelines, and regulations in real time and so tribes are able to protect their interests. The 2022 Drought Response Operations Plan is a good example of collaboration and inclusion of tribes in Colorado River Basin discussions. That Plan authorized the inclusion of the Six (6) Upper Basin Tribes, including the Southern Ute Indian Tribe, in any working group established by the Drought Response Operating Agreement Parties to assist with drafting, developing, implementing, analyzing proposals, or monitoring any Drought Response Operation. This example allows tribes meaningful participation in the discussions while they are ongoing and to provide any input during those discussions, not after the discussions have concluded. In addition, as trustee to the Tribe, Reclamation has an obligation to ensure that the Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead do not have a detrimental impact on Southern Ute's water rights or the future development of its water rights. Southern Ute urges Reclamation to ensure that the Post-2026 Guidelines are implemented in a manner consistent with Southern Ute's water rights and Reclamation's trust obligation to Southern Ute. Last, the United States must commit to engaging in formal consultation with the Tribe if the Tribe is going to be affected by actions taken to protect Lakes Powell and Mead in the development of the Post- 2026 Guidelines. When initiating the NEPA process, the Tribe asks Reclamation to remember its trust responsibility to honor the Tribe's sovereignty, water settlement, and Federal Indian Reserved water rights.	Southern Ute Indian Tribe	Astor, Feather

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16804	7	CONSCULT - Consultation tribal related	The Post 2026 Guidelines process should set a precedent of honoring the sovereign rights of the basin's Tribal communities. Tribes have largely been excluded from past decision-making processes in the basin while also experiencing some of the most severe impacts of climate change and other crises like COVID-19. Still, several Tribes have voluntarily engaged, or signaled a desire to engage, in partnerships that can improve water availability and basin health for all people. Reducing uncertainty around Tribal water rights can also help expand predictability for other users.5 Thus, fully involving the Tribes in the scope of the Post 2026 process - and supporting their efforts toward water right quantification and settlement, development and wet water use, and the ability to lease or trade water to the extent they desire - is necessary to address water scarcity for all people in more equitable and just ways.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
17241	4	CONSCULT - Consultation tribal related	6. It is imperative that Tribal Nations be involved in crafting workable solutions with the federal government and the states and it is time to correct the historical wrong of Tribal exclusion.	National Audubon Society	Jennifer Pitt
17241	11	CONSCULT - Consultation tribal related	Be inclusive - Many historic laws, compacts, and treaties that form the foundation of Colorado River management were adopted when institutionalized exclusion of some peoples and interests, particularly Tribal sovereigns who have lived in the basin since time immemorial, was common. Reclamation's process must reverse those inequities and include representatives of Tribal sovereigns with Colorado River water rights, both settled and unsettled. Audubon cannot speak for the Colorado River Basin's Tribes, but we urge Reclamation to listen to the Tribes' suggestions for inclusion in the decision-making process.	National Audubon Society	Jennifer Pitt
20417	4	CONSCULT - Consultation tribal related	4. The 30 federally recognized Basin Tribes, many whose water rights, infrastructure needs and values have been long denied, must be included in the decision-making process and have equitable access to clean drinking water.	Western Resource Advocates	Bart Miller
20417	23	CONSCULT - Consultation tribal related	g. Supporting Tribal inclusiveness, water needs, and stewardship of Basin resources WRA strongly supports Reclamation taking full account of the needs, concerns, and priorities of the Colorado River basin Tribes in revising the 2007 Guidelines and taking other appropriate actions. While the Tribes are undoubtedly the best spokespeople for articulating their specific needs, WRA urges Reclamation to consider several points in formulating its NEPA scope of analysis and process framework. First, it is essential that Tribes be involved in the process of developing workable solutions, and historical Tribal exclusion should be remedied in the post-2026 Interim Guideline process by enabling Tribes to have a seat at the table. Reclamation should be commended for recognizing the importance of active and meaningful involvement by sovereign tribes in the Basin. WRA is hopeful that a process will be determined for robust Tribal participation.	Western Resource Advocates	Bart Miller
20438	13	CONSCULT - Consultation tribal related	1. Establish a governance structure that provides Tribal Nations a shared role in decision- making processes - consistent with their sovereign status - that implicate and/or affect their respective rights, interests, and resources within the Basin;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	25	CONSCULT - Consultation tribal related	a. Full participation of Tribal Nations as coequal sovereign governments, in support of self-determination, in the negotiations and decisions for the implementation of the future strategies that will work to protect Tribal water and water-related resources, rights, and interests in the Colorado River.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	33	CONSCULT - Consultation tribal related	5. Flexible tools that advance basin integrity and proactive management of the system in a manner that fully represents the rights and interests of Tribal Nations;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20469	18	CONSCULT - Consultation tribal related	Tribal involvement in Post-2026 negotiations and planning There are 30 federally recognized tribes in the Colorado River Basin -- some have adjudicated water rights, while others have water claims that remain unresolved. Many tribes lack the infrastructure and money to use their full allotments. And shamefully, many tribal communities lack access to clean water; a profound failure of the trust and treaty responsibilities of our federal government. To date, the tribes of the Colorado River Basin have been largely excluded from discussions on how the river is shared and managed. They now demand a seat at the table, and rightly so. Prioritizing inclusion and access to clean water for all Colorado River Basin tribes is an absolute necessity for this EIS process and a keen responsibility on the part of the federal agencies to usher in a new era of cultural justice based on tribal involvement and respect for tribal needs, perspectives, and traditional ecological knowledge.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20476	1	CONSCULT - Consultation tribal related	With current and forecasted hydrologic conditions, impacts to the Navajo Nation are broader than previously anticipated, making paramount the need for active and meaningful engagement with the Navajo Nation throughout the development of Post-2026 Operational Guidelines, and adequate accounting of the impacts to the Navajo Nation.	Navajo Nation	Buu Nygren
20476	6	CONSCULT - Consultation tribal related	For the reasons set forth above, the Navajo Nation must be actively and meaningfully involved in the development of Post-2026 Operational Guidelines and Strategies and the management of reservoirs in the Colorado River Basin. History has shown that unprecedented emergency releases considered without consultation with the Navajo Nation impact the Nation's secured water rights. otification to Tribes after decisions are made and effectuated by the Federal Government and Basin State Principals is unacceptable. The Navajo Nation is hopeful that the Federal-States-Tribes Group organized by the Bureau of Reclamation will provide an opportunity for substantive dialogue between sovereigns and identify workable solutions.	Navajo Nation	Buu Nygren

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20480	6	CONSCULT - Consultation tribal related	In particular, successful management of the Colorado River will depend on the support and participation of the Tribes.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	27	CONSCULT - Consultation tribal related	We look forward to continued collaboration with Colorado River Basin Tribes. Successful management of the Colorado River will depend on the support and participation of the Tribes.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	8	CONSCULT - Consultation tribal related	5. The post-2026 Guidelines must recognize the sovereign roles, rights, and interests of Tribal Nations as fundamental to the fabric and longevity of the Colorado River Basin. It is imperative that Tribal Nations be afforded their rightful role in negotiations and decision-making processes that influence and/or affect their rights, authorities, and interests in the Colorado River supply.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	37	CONSCULT - Consultation tribal related	e. National historic preservation considerations - The Colorado River Basin's cultural resources are an integral part of the Basin's history and identity. Consideration of how to preserve these resources should not be minimized as the Colorado River community develops post- 2026 operational strategies for the Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	47	CONSCULT - Consultation tribal related	i. Preserve Tribal Nations' roles and rights to self-determination throughout the NEPA process. As the NEPA process develops, federal agencies should continually confirm that Tribal Nations agree with the processes that have been established for including them in decision-making and coordinating and identifying their respective needs and perspectives into future operational strategies and the decision-making process.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	13	CONSCULT - Consultation tribal related	In addition to participating as a cooperating agency pursuant to NEPA, the NPS is prepared to participate in consultations because of the cultural and ethnographic resources that may be impacted.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	14	CONSCULT - Consultation tribal related	NPS urges close government-to-government consultation with Tribes, guided by the President's Memorandum on Uniform Standards for Tribal Consultation (11/30/22).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20502	2	CONSCULT - Consultation tribal related	Reclamation must: (1) prioritize the tribal trust responsibility;	Tohono O'Odham Nation	Verlon Jose

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20502	5	CONSCULT - Consultation tribal related	Finally, prior to issuing any draft Environmental Impact Statement, Reclamation also must engage in government-to-government consultation with the Nation concerning these comments, other comments that it receives.	Tohono O'Odham Nation	Verlon Jose
20502	10	CONSCULT - Consultation tribal related	II. Government-to-government consultation with the Nation As confirmed by a host of authorities, the federal government is required to conduct meaningful government-to-government consultation with federally recognized Indian Tribes in conjunction with (and prior to) the implementation of plans with tribal implications.32 As Interior's Departmental Manual makes clear, "Bureaus and offices must consult tribes . . . whenever a DOI plan or action with tribal implications arises," and must "incorporate tribal views in their decision making processes."33 The Post-2026 process unquestionably has tribal implications within the meaning of the federal government's consultation requirements.	Tohono O'Odham Nation	Verlon Jose
20608	10	CONSCULT - Consultation tribal related	Seek to engage all 30 Colorado River-affiliated Tribal Nations, again at a minimum, the 13 Grand Canyon-affiliated Tribes of the recently formed Grand Canyon Tribal Coalition, in the development of the EIS as co-stewards of the Colorado River, and to provide recommendations to the Secretary of Interior.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20700	43	CONSCULT - Consultation tribal related	II. PROMOTE MEANINGFUL INCLUSION OF TRIBES. Meaningfully consult with and provide each of the 30 tribal nations in the Colorado River Basin an opportunity to participate as equal sovereigns directly in post-2026 negotiations between the U.S., the seven basin states (Arizona, California, Colorado, Nevada, New Mexico, Utah, Wyoming), and Mexico.	Grand Canyon Trust	Jen Pelz
20700	44	CONSCULT - Consultation tribal related	A. PROPOSE AND IMPLEMENT A PROCESS. Reclamation should propose and implement a process to promote meaningful inclusion of the 30 basin tribes as soon as possible. Reclamation indicates that it "intends to develop an approach that facilitates inclusion at multiple levels and enhances tribal engagement and inclusivity . . . including individual outreach, leverage existing groups and forums, create new groups and forums, and provide for clear and timely communication with the public." 88 Fed. Reg. at 39457. We appreciate the intention and work Reclamation is putting into developing these processes. Given the "resounding consensus advocating for increased tribal participation in the post-2026 process" from the pre-scoping comments, we were hopeful that Reclamation would have a suggested process or would have provided additional thoughts on what that process might look like in the scoping notice. See Pre-Scoping Report at 10. Now that the formal NEPA process has begun, we recommend Reclamation propose and implement a process to promote meaningful inclusion of the basin tribes. This process needs to be in place as soon as possible to ensure those engagement opportunities are available throughout the process. Further, it would be helpful to understand what existing or new groups Reclamation is planning to utilize or form as a part of the post-2026 process, what the composition of the existing groups are, and what tribes or individuals participate. Some questions to consider include: Are there barriers to participation that Reclamation might be able to help overcome with resources or other support? Is there a way non-governmental organization could help provide resources if federal support is not available? Are there new voices or tribes that are interested in engaging? Is Reclamation visiting each of the tribes in person? What is each tribe's preference for engaging (e.g. written comments, in person meetings)? Where are the meetings being held?	Grand Canyon Trust	Jen Pelz
20700	45	CONSCULT - Consultation tribal related	B. OPPORTUNITY FOR TRIBES TO PARTICIPATE AS EQUAL SOVEREIGNS. Reclamation should seriously consider the request by many tribes to be given the opportunity to participate as equal sovereigns with the U.S., basin states and Mexico directly in the post-2026 negotiations. The Summary of the Pre-Scoping Comments for "Tribal outreach and involvement" provides that Throughout the stakeholder and tribal letters, there was a resounding consensus advocating for increased tribal participation in the post-2026 process. Recommendations included inviting tribes to participate directly in federal-state negotiations and establishing regularly scheduled meetings; meaningfully considering, integrating, and responding to tribal input; clearly and explicitly specifying opportunities and timeframes for tribal input; directly involving DOI or other federal agency personnel involved with tribal coordination; and initiating Section 106 (pursuant to the National Historic Preservation Act) government-to-government consultation with tribes early in the process. Stakeholders further recommended using Indigenous Traditional Ecological Knowledge to inform the decision-making process.	Grand Canyon Trust	Jen Pelz

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20700	46	CONSCULT - Consultation tribal related	A very specific request was made by the Governor Lewis of the Gila River Community as well as other tribes to be included as equal sovereigns in any meetings between the United States and the seven basin states in an effort to provide "all basin tribes need [the opportunity] to be at the table." Governor Lewis's request was as follows : the table should include representatives from all 38 sovereign governments in the United States' portion of the basin. So that is of course the United States, the seven basin states, and the 30 basin tribes. Now some basin tribes may not want to participate for whatever reason but nonetheless they should have a seat if they want one. And I strongly believe that this group of 38 sovereigns should meet whenever the United States feels it has to meet with all of the principals of the seven basin states. And as we develop a post-2026 plan it's no longer acceptable for the United States to meet with seven basin states separately and then come to basin tribes after the fact with post-hoc explanation or rationalization of what was discussed or even worse what was decided Only when US decides to meet with all basin states principals would the requirement to include all tribes at that time would be triggered. This new inclusion plan should be done as soon as possible so it can be used as we start this post-2026 process. I strongly believe it should be established and in place before the post- 2026 scoping comment period deadline. (Minute 1:07-1:10) Other tribes that made similar requests: * "We must be a part of the discussions as they occur" - Jicarilla Apache Nation, Pre-scoping Letter dated September 1, 2022 at 1. * "The Tribe wants to be at the table during discussions and negotiations. As a sovereign in the Basin, the Tribe does not want to be updated on the negotiations between the States and the Federal team after decisions are made; the Tribe wants to be at the table during discussions and negotiations." - Southern Ute Indian Tribe, Pre-scoping Letter dated September, 1 2022 at 2. * "The Tribe is ready and eager to engage at the highest levels of the discussions and negotiations that will be necessary both to create a sustainable post-2026 future and to address the crisis the Basin is already facing. We will show up wherever we are invited- and will seek to interject ourselves even when we are not - because the health of the River, and our ability to continue to utilize our hard-won water rights for the benefit of our members, are of existential importance to the Tribe." - Quechan Indian Tribe, Pre-scoping Letter dated August 29, 2022 * "The Secretary must ensure that the Nation and other tribes with CAP allocations are able to equitably participate in any operational strategies that may be adopted for Post-2026 operations. This includes not only ensuring that tribes may legally participate, but also ensuring that any practical barriers to participation are addressed given the fact that tribes have a unique legal and jurisdictional status within the Colorado River system. - Yavapai-Apache Nation, Pre-scoping Letter dated September 1, 2022 at 2. * "We strongly request that (1) the Ute Indian Tribe be seated as a participant on the Upper Colorado River Commission; and (2) the Bureau of Indian Affairs have visible and active representation as a federal partner in Reclamation's leadership role in working to develop strategies for the post-2026 management of the Colorado River." - Ute Indian tribe, Pre-scoping Letter dated August 30, 2022 pre-scoping at 2. * "I repeat my hope that the United States will fully implement its commitment to engage in pre- decisional, government- to- government consultation with Ak- Chin and other Basin Tribes as it works to develop post-2026 Colorado River operating guidelines and to identify and implement interim conservation measures. It is vital that the federal government both hear from Tribes and provide them with information and assistance necessary to understand and evaluate any proposals that will affect tribal rights and interests will in advance of such proposals being adopted." - Ak-Chin Indian community, Pre-scoping Letter dated September 1, 2022 at 2. * "This process should not be difficult. The Tribes should be included in all substantive meetings to develop the next set of operational guidelines. The CRIT do not want to be informed of the decisions made or agreements reached with the Basin States. It is critical that we be in the meetings and provide our voices to shape those decisions and agreements. Because our water use is accounted for as part of each state's apportionment, does not mean we are state water users, within the jurisdiction of state water laws, or that the states know or understand our interests in the Colorado River." - Colorado River Indian Tribes, Pre-scoping Letter dated September 1, 2022 at 1.	Grand Canyon Trust	Jen Pelz
20738	3	CONSCULT - Consultation tribal related	Another important process improvement from the 2007 Interim Guidelines (2007 IGs) that must be incorporated in the post-2026 EIS and ROD relates to consultation. In Section 7.8 of the ROD adopting the 2007 IGs, Reclamation specifically committed to consulting with the Basin states in the event circumstances arose that were not squarely addressed in the 2007 IGs themselves. While such consultation is certainly appropriate, the failure to extend these consultation requirements to include Basin tribes was yet another example of the ways tribes have been cut out of Basin governance since the adoption of the Colorado River compact (and before).1 This error must not be repeated in the ROD that emerges at the end of the post-2026 EIS process. Instead, any such ROD should specifically require Reclamation to consult with Basin tribes in parity with the Basin states.	Quechan Indian Tribe	Jordan Joaquin
20817	17	CONSCULT - Consultation tribal related	The success of new guidelines for Post-2026 Operations at Lake Powell and Lake Mead will depend on the support and participation of the Colorado River Basin Tribes. The Upper Division States, acting through the UCRC, will continue to use interstate and intrastate efforts to collaborate with the Tribes and look forward to their participation in EIS process.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20865	2	CONSCULT - Consultation tribal related	The Tribe welcomes the opportunity to continue to engage in consultation with Reclamation as you work to formulate a management system for the Colorado River Basin that is cognizant of the needs of the Tribes which is informed by the context of history.	Pascua Yaqui Tribe	Peter Yucupicio

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20913	26	CONSCULT - Consultation tribal related	The need to consult tribes on impacts to Glen Canyon Resources According to the National Park Service, 19 American Indian tribes and bands have an association and cultural affiliation with Glen Canyon -- including contemporary descendants of the people who left behind the thousands of archeological sites in the canyon72. The Navajo, Hopi, Ute, Southern Paiute, Zuni and Puebloan tribes all have deep connections to Glen Canyon, and consider it to be part of their ancestral homelands. When the canyon was flooded, hundreds of tribal members were displaced73 -- their homes, farms and sacred sites drowned74. As more ancestral lands emerge from the reservoir, there is an opportunity for the federal government to develop cooperative tribal management associated with their historical use of the area. There could be recreational economic opportunities for guiding, like the Hualapai tribe does in the Grand Canyon, or the Navajo Nation does in Antelope Canyon. The Post-2026 EIS should consult tribal leadership on management of Glen Canyon's emerging archeological, ecological, and recreational resources.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20916	3	CONSCULT - Consultation tribal related	The EIS should promote the inclusion of Indigenous voices and tribal participation in the management decisions for both water rights and resources, but also for ecologically recovering areas and those that hold deep and sacred cultural significance.		Travis Custer
20930	2	CONSCULT - Consultation tribal related	D. Inclusion of the CRIT in all mechanisms to address and create a more resilient water supply. As noted above, existing mechanisms to conserve existing supplies are expiring and we anticipate either new programs to be developed or existing ones to be renewed. As a senior water rights holder, the CRIT should be patt of the solution. It makes no sense, therefore, for any policies seeking to conserve use to be developed in a manner that does not allow for the CRIT to patticipate. Currently, there are too many impediments for the CRIT to participate folly in System Conservation, Intentionally Created Surplus, and paid forbearance. The DEIS must analyze and disclose these impediments along with proposals on how to allow the CRIT, and other similarly situated Tribal Nations, to fully participate in these actions.	Colorado River Indian Tribes	Rebecca Loudbear
20930	6	CONSCULT - Consultation tribal related	A. We reiterate our desire for continuing consultation that is timely and meaningful. As we have expressly stated many times over the past several years and as is inherent in our comments above, we can be pati of the solution. But to be part of the solution, the consultation process must be both continuing and meaningful. And Reclamation must avoid taking positions that have the effect of harming the CRIT. We urge Reclamation to look for more ways to allow the CRIT to be at the table when decisions regarding our water rights are being made. We welcome the opportunity to discuss with Reclamation our thoughts on concepts for Post-2026 Operations that would more fully allow the CRIT and other Tribal Nations to be part of the long-tetm solution for a sustainable River. In conclusion, the CRIT will continue to be a collaborative partner to Reclamation and other water users in the Lower Basin. The key to a constrnctive working relationship is respect: respect for CRIT's sovereignty, respect for CRIT's decreed water rights, and respect for the solutions the CRIT can bring to the table. We look forward to working with Reclamation and other parties to resolve the challenges facing the Colorado River.	Colorado River Indian Tribes	Rebecca Loudbear
20932	13	CONSCULT - Consultation tribal related	The success of new guidelines for Post-2026 Operations at Lake Powell and Lake Mead will depend on the support and participation of the Colorado River Basin Tribes. The Upper Division States, acting through the UCRC, will continue to use interstate and intrastate efforts to collaborate with the Tribes and look forward to their participation in EIS process.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20935	1	CONSCULT - Consultation tribal related	Earlier this year, the Gila River Indian Tribe entered into an agreement with the Bureau of Reclamation to receive funding for a variety of water infrastructure projects, including solar panels installed above water canals - the first effort in the entire United States [1]... The announcement of a project, however, is much different than the completion of it. History of federal/tribal relations are replete with broken promises on the part of the US government. While there is no reason to believe that the US government reached an agreement with the Gila River tribe deceitfully, there is legitimate reason for concern about whether the federal government has the technical and manufacturing capability to deliver on its promises.Agreements to fund critical infrastructure projects that help tribes develop their lands and encourage the innovation required to successfully deal with the problem of the Colorado River are indeed a heartening step, but the true celebrations should be withheld until the projects are actually completed.... Much discussion has revolved around the need for tribes to have a seat at the table when it comes to decision making. This step is so self-evidently needed that further elaboration would be redundant. The onus of developing the trust relationship between tribes and the federal government lies with the United States government; we need to prove that we have the required wherewithal to deliver on our commitments. Providing sums of money that include a bunch of zeroes is undoubtedly part of the answer, but I worry that we are conflating throwing money at a problem, with solving it.		Greg Bolla

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20936	11	CONSCULT - Consultation tribal related	In addition to holding the recently established Federal-State-Tribal Group meetings, Tribal Information Exchange meetings and the Post-2026 Integrated Technical Education Workgroup meetings, Reclamation must engage the Community, and any other Basin Tribes that have requested formal consultation, in meaningful and robust Nation-to-Nation consultation throughout the EIS process. President Biden recently ordered that consultations must ensure all applicable information is readily available to consulting parties and that Federal and Tribal officials have adequate time to communicate.6 Reclamation must then take the Tribal input it receives into account; and provide an explanation of how Tribal input was received, how that Tribal input was addressed, and the reasoning for any instance in which Tribal suggestions were not incorporated into the Departmental action or any instance where consensus could not be obtained.7 Reclamation must also timely disclose to affected Basin Tribes the outcome of consultation and decisions made because of consultations.8 To satisfy these consultation requirements, Reclamation must consult the Community and other requesting Basin Tribes before and after each of its decision points. Reclamation must consider the concerns of Basin Tribes, and provide information based on the differentiated impacts they may feel from federal action. While the EIS will be conducted within a tight timeframe, Reclamation should provide sufficient time for Tribes, such as the Community, to meaningfully respond to information provided before and after the draft EIS is released at the end of 2024, and before and after any key milestones throughout the NEPA process. Reclamation should also create and share a model with Tribes, such as the Community, who have requested it to illustrate for decision-makers how proposed cuts may affect Tribal water supplies. And, if there are consensus alternatives being discussed, the Community and other requesting Basin Tribes need to know what is under discussion. Ideally, the opportunity to discuss of consensus alternatives will be provided in the Federal-State-Tribal Group meetings and in individual consultation sessions.	Gila River Indian Community	Stephen Lewis
20945	2	CONSCULT - Consultation tribal related	8. Strategies for Post-2026 Operations at Lake Powell and Lake Mead will depend upon participation of the Colorado River Basin Tribes.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	22	CONSCULT - Consultation tribal related	Participation of the Colorado River Basin Tribes is critical to this process. To that end, Colorado is engaging with the other Basin States to coordinate with the Colorado River Basin Tribes. Colorado and the other Upper Division States through the UCRC, are also engaging with the Upper Basin Tribes, and Colorado continues to work closely with the Southern Ute Indian Tribe and the Ute Mountain Ute Indian Tribe.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20950	4	CONSCULT - Consultation tribal related	4. The post-2026 Guidelines should recognize the sovereign roles, rights, and interests of Tribal Nations as fundamental to the fabric and longevity of the Colorado River Basin. It is imperative that Tribal Nations are afforded their rightful role in negotiations and decision-making processes that will influence and/or affect their rights, authorities, and interests.	Gadsden Company, Sonoran Wines, Cruz Farm, Greater Area Kingman Chamber of Commerce, Bullhead City Chamber of Commerce; Greater Flagstaff Area Chamber of Commerce	Harold Thomas
20952	5	CONSCULT - Consultation tribal related	* Provide a summary of government-to-government collaboration and communications with Basin tribes, and the identification of long-term management or operational actions needed to account for unsettled, unresolved, or unfulfilled indigenous rights to Colorado River water.	Environmental Protection Agency Region IX	Robin Truitt

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20952	21	CONSCULT - Consultation tribal related	Meaningful engagement and collaboration with Basin tribes is crucial to the success of any future operational decisions and studies. EPA appreciates Reclamation's commitment to engaging and consulting with Basin tribes in a meaningful and transparent manner and its endeavor to fully consider tribal input and viewpoints.25 Government-to-Government Consultations The EPA notes Executive Order 14096 clarifies that "[c]ommunities with environmental justice concerns exist in all areas of the country, including...within the boundaries of Tribal Nations." Although some issues overlap, the EPA recommends that the Draft EIS consider separating the discussion and analysis of tribal issues and concerns from the analysis of environmental justice, unless a specific tribe has requested that their concerns be addressed in the environmental justice section. Thoroughly describe the process and outcome of government-to-government consultation between Reclamation and tribes, including issues that were raised and how those issues were addressed in the development and selection of the proposed alternative and proposed mitigation. Section 2 of the Presidential Memorandum on Uniform Standards for Tribal Consultation26 states "Consultation requires that information obtained from tribes be given meaningful consideration, and agencies should strive for consensus with tribes or a mutually desired outcome." The Standards present best practices and consultation policies that call on federal agencies to incorporate tribal treaty and reserved rights into agency decision-making with the goal of co-management and co-stewardship of federal land and water. In the Long Term Experimental and Management Plan for the Glen Canyon Dam,27 Reclamation and the National Park Service incorporated tribal information, perspectives, and analyses into multiple resource 24 Even though prepared for a transportation agency, EPA recommends using the Guidance for Preparers of Cumulative Impact Assessments (2005) which has wide application for assessing cumulative effects in EJ analyses. Guidance for Preparers of Cumulative Impact Analysis | Caltrans; https://dot.ca.gov/programs/environmental-analysis/standard- environmental-reference-ser/cumulative-impact analysis 25 Public hearing July 17, 2023 and https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_FinalReport_12-18- 2020.pdf 26 Presidential Memorandum on Uniform Standards for Tribal Consultation at https://www.whitehouse.gov/briefing- room/presidential-actions/2022/11/30/memorandum-on-uniform-standards-for-tribal-consultation 27 https://www.usbr.gov/uc/progact/amp/ltemp.html#LTEMP chapters. This was a unique opportunity to discuss tribal perspectives in a holistic and informative way and we encourage Reclamation to explore a similar approach, as appropriate, in the Draft EIS. To the extent such information is not sensitive or otherwise confidential, summarize in the Draft EIS the areas in which consensus with tribes regarding their treaty or reserved rights and mutually desired outcomes are achievable.	Environmental Protection Agency Region IX	Robin Truitt
20952	22	CONSCULT - Consultation tribal related	National Historic Preservation Act and Executive Order 13007 Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act. Historic properties under the NHPA are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated. Section 106 of the NHPA requires that Federal agencies consider the effects of their actions on cultural resources (36 Code Fed. Reg. 800).	Environmental Protection Agency Region IX	Robin Truitt
20952	23	CONSCULT - Consultation tribal related	Executive Order 13007, Indian Sacred Sites (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, tribal sacred sites by its religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. The EPA recommends that the Draft EIS address the existence of Indian sacred sites in the Basin, as distinguished from Section 106 of the NHPA, and discuss how Reclamation would avoid adversely affecting the physical integrity, accessibility, or use of sacred sites, if they exist. Summarize all coordination with tribes and with the SHPO/THPO, including identification of National Register of Historic Places eligible sites, and whether Cultural Resource Management Plans need be developed.	Environmental Protection Agency Region IX	Robin Truitt
20963	2	CONSCULT - Consultation tribal related	Ensure that there is consistent and transparent communication and consultation among all sovereigns (federal, state, and Tribal Nations) during the NEPA process. Basin Tribal Nations have recognized water rights to approximately 25% of Colorado River water under senior or high priority reserved rights, and many Tribal Nations are in the process of quantifying additional rights to Colorado River water. It is imperative that Tribal Nations be involved with the federal government and the states in developing sustainable solutions to how the river is managed. We applaud the Bureau for actively initiating this type of communication and consultation by convening a meeting on August 10th in Phoenix to which all seven basin states and 30 Tribal Nations were invited. This should be the beginning of ongoing "sovereign to sovereign" engagement as part of the planning process.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	3	CONSCULT - Consultation tribal related	Work toward integrating collaborative decision-making into the new management framework that provide Tribal Nations a shared role in decision-making processes that implicate and/or affect their respective rights, interests, and resources within the Basin.1 Draw on lessons learned and best practices from other transboundary river basin commissions.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner

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20981	2	CONSCULT - Consultation tribal related	Ensuring Meaningful Tribal Inclusion Both the process for developing the post-2026 strategies, and the parallel processes for addressing emergent issues within the Basin, must meaningfully include tribal sovereigns to rectify the historical exclusion of tribes from Colorado River policy and decision making. The Nation appreciates Interior's commitment, as stated in the notice, to develop an outreach approach that "enhances tribal engagement and inclusivity" and to "prioritize regular, meaningful, and robust consultation with Tribal nations." To fulfill this commitment, and consistent with the federal government's trust responsibility, the Nation proposes that Interior create a formal and permanent structure for tribal inclusion in Colorado River decision-making, as those discussions occur. Specifically, the Nation suggests that Interior establish a regular schedule of meetings among the sovereigns-tribal, state, and federal-to discuss proposals currently on the table and the status of efforts to address emergent challenges. To adequately protect the Nation's interests, we must be part of the discussions as they occur, not simply be provided an opportunity to comment after policies and programs have been developed by others. Success will require active participation and accountability from all participants and it is the federal government's obligation to create an environment in which this occurs. In so doing, the federal government can work to uphold its obligation to include tribes in a meaningful and transparent manner, allowing for collaborative and informed decision-making processes that respect tribal sovereignty.	Jicarilla Apache Nation	Edward Velarde
20981	8	CONSCULT - Consultation tribal related	As indigenous people, we recognize the inextricable connection to the land and water, which brings a profound sense of balance and responsibility. We eagerly anticipate working collaboratively in the months and years ahead to protect the Colorado River system, honor the ancestral ties, and uphold the rights and well-being of the people, plants, and species that depend on the Colorado River. Acknowledging the historical exclusion of tribes from river management decisions, we emphasize the paramount importance of forging a partnership built on mutual respect, active engagement, and a genuine understanding of the indigenous perspective. By embracing this holistic approach, we can address the challenges at hand, develop sustainable solutions, and ensure the long-term vitality of the Colorado River for ourselves and for future generations to come.	Jicarilla Apache Nation	Edward Velarde
20986	8	CONSCULT - Consultation tribal related	New Mexico encourages Reclamation to further include Native American Tribes in the development of this EIS. Tribes hold title to a large portion of water in the Colorado River Basin and their participation and inclusion in this process is critical to finding solutions going forward.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20989	1	CONSCULT - Consultation tribal related	Many ideas and solutions will come out of this process, but it should not divide the users on the Colorado River. Truth in the matter is that we are all humans and we all need water. Climate change is real, it is here. As tribes finally come into the picture, other Colorado River users need to know that these reservation boundaries weren't our original homelands. As tribes, we didn't decided where we should live, the Federal government decided that for us. For many centuries before we lived as nomadic people; following the river, following the food. Traditional, cultural indigenous knowledge is very valuable and should be incorporated into all aspects of the Post- 2026 Operational guidelines and strategies for Mead and Powell.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
21001	5	CONSCULT - Consultation tribal related	The post-2026 Guidelines should recognize the sovereign roles, rights, and interests of Tribal Nations as fundamental to the fabric and longevity of the Colorado River Basin. It is imperative that Tribal Nations are afforded their rightful role in negotiations and decision-making processes that will influence and/or affect their rights, authorities, and interests.	Bonneville Environmental Foundation	Todd Reeve
21094	5	CONSCULT - Consultation tribal related	The Bureau of Reclamation's trust responsibility to tribes, including the Southern Ute Indian Tribe, requires Reclamation to ensure that tribes are included in the development of the Post-2026 operational guidelines for Lakes Powell and Mead. The Tribe urges Reclamation to take the lead in bringing tribes to the table during negotiations between the state and federal teams, so the tribes can respond to the suggested rules, policies, guidelines, and regulations in real time and so tribes are able to protect their interests. The 2022 Drought Response Operations Plan is a good example of collaboration and inclusion of tribes in Colorado River Basin discussions. That Plan authorized the inclusion of the Six (6) Upper Basin Tribes, including the Southern Ute Indian Tribe, in any working group established by the Drought Response Operating Agreement Parties to assist with drafting, developing, implementing, analyzing proposals, or monitoring any Drought Response Operation. This example allows tribes meaningful participation in the discussions while they are ongoing and to provide any input during those discussions, not after the discussions have concluded.	Southern Ute Indian Tribe	Melvin Baker
21094	7	CONSCULT - Consultation tribal related	Last, the United States must commit to engaging in formal consultation with the Tribe if the Tribe is going to be affected by actions taken to protect Lakes Powell and Mead in the development of the Post- 2026 Guidelines. When initiating the NEPA process, the Tribe asks Reclamation to remember its trust responsibility to honor the Tribe's sovereignty, water settlement, and Federal Indian Reserved water rights.	Southern Ute Indian Tribe	Melvin Baker
21097	3	CONSCULT - Consultation tribal related	The Nation welcomes the opportunity to continue to engage in consultation with Reclamation as you work to formulate a management system for the Colorado River Basin that is cognizant of the needs of the Tribes which is informed by the context of history.	Yavapai-Apache Nation	Tanya Lewis
21151	3	CONSCULT - Consultation tribal related	Reclamation has an obligation to disclose to Hopi in government-to government consultation the potential impacts to Hopi of any proposed changes in operations.	Hopi Tribe	Timothy Nuvangyaoma

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20469	17	CONSOTHER - Consultation and Coordination	The National Park Service should be a cooperating agency The NPS manages, protects, and conserves resources and the quality of the visitor experience in nine park units distributed throughout the Colorado River Basin: Dinosaur National Monument, Curecanti National Recreation Area, Black Canyon of the Gunnison National Park, Canyonlands National Park, Arches National Park, Glen Canyon National Recreation Area, Rainbow Bridge National Monument, Grand Canyon National Park, and Lake Mead National Recreation Area. The NPS has requested (and should be granted) cooperating agency status for the forthcoming National Environmental Policy Review (NEPA) process, pursuant to 40 CFR 1501.8. As per Council of Environmental Quality regulation (40 CFR 1508.5), "cooperating agency" means any Federal agency, other than a lead agency, that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposed project or project alternative. Clearly the NPS is more than qualified to serve as a cooperating agency for this EIS and not including them would be a black mark on the legitimacy of the EIS itself. Furthermore, the multiple sovereign Tribes that have expressed interest should also be extended an opportunity to participate as cooperating agencies.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20486	3	CONSOTHER - Consultation and Coordination	In addition to the lessons learned from dry hydrology and depleted storage conditions, the 2007 Guidelines also included an equally important lesson--we must encourage all parties to address future controversies on the Colorado River through consultation and negotiation before resulting to litigation. The importance of that lesson will intensify in times of water supply scarcity. As such, any alternative must improve cooperation and communication between the Basin States, and avoid circumstances which could otherwise form the basis of claims or controversies over interpretation or implementation of the Colorado River Compact and other applicable provisions of the Law of the River.	State of Wyoming	Brandon Gebhart
20608	9	CONSOTHER - Consultation and Coordination	7. At a minimum, include NPS as a cooperating agency for this EIS.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20913	20	CONSOTHER - Consultation and Coordination	NPS Mandates, Grand Canyon Protection Act, and Endangered Species Act Similar to the 2007 Interim Shortage Guidelines, the Post-2026 Guidelines will require extensive cooperation with the National Park Service (NPS). With ten national park units directly affected by Colorado River operations, NPS should be an official cooperating agency in developing and assessing operational strategies. They were in the Glen Canyon Environmental Studies (1982-1996) and should be afforded the same level of engagement now. The decisions made around how Glen Canyon Dam is operated will have widespread effects on areas and resources that fall under the jurisdiction of NPS. As NPS is responsible for "conservation of natural and cultural resources and administers visitor use"46, it is essential that decisions around how to manage Lake Powell, Glen Canyon, Grand Canyon, and Canyonlands incorporate up-to-date information on changing and emerging resources in those park units. Additionally, Public Law 102-575, which includes the Grand Canyon Protection Act requires that Glen Canyon Dam be managed "in such a way as to protect, mitigate adverse impacts to and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use47." Public Law 102-575 has not been repealed and as such has to be acknowledged and used to establish the parameters of the Post-2026 analysis.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	31	CONSOTHER - Consultation and Coordination	8. The need to assist NPS in planning for a Glen Canyon in the 21st century With conditions changing so rapidly on the ground in Glen Canyon National Recreation Area, it will be vital for the Post-2026 NEPA process to provide the resources to assist NPS in planning for adapting to new physical realities at the park. GCNRA's management plan has not been updated since 197978. GCNRA develops its facilities planning based on projections and guidance from Reclamation79 The recreation landscape at the park is changing at speeds that are almost impossible for the park to keep up with. Last year, there was a two month period where nearly every boat ramp at the reservoir was non-operational, with boat ramps being extended and marinas being moved as quickly as possible. Hite and Dangling rope marinas have closed indefinitely. GCNRA has stated recreational use on the emerged Colorado River in Cataract Canyon/North Glen Canyon has increased dramatically, as has land based recreation around the park80. Yet, the takeout ramp for Cataract Canyon rafting trips near Hite, UT has repeatedly degraded in recent years, creating a safety hazard as well as deterring recreational visitation to the area. Recent communications from GCNRA have indicated possible plans for this access point, but with no timeline, which could mean this serious safety issue could persist for years. Public safety in a National Park cannot be left unattended or ignored.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20932	12	CONSOTHER - Consultation and Coordination	details regarding implementation of the long-range operating criteria are unclear. We request that the Secretary consult the Basin States for input on the development of the No Acon alternave.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20938	13	CONSOTHER - Consultation and Coordination	Finally, the unique role of the seven Colorado River basin states (Basin States) in the EIS process cannot be overstated. The involvement of the Basin States in the development of Post-2026 Operations is essential to ensuring their effectiveness. Accordingly, Utah will work closely with Reclamation and the Basin States during the pendency of this NEPA process, including through the development of a Basin States alternative for evaluation by Reclamation in the EIS.	Colorado River Authority of Utah	Betsy Coleman

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20945	21	CONSOTHER - Consultation and Coordination	Colorado, with the other Upper Division States, has committed to a process with the Lower Division States to develop a consensus Basin States Agreement Alternative.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20955	5	CONSOTHER - Consultation and Coordination	The Post-2026 Process Should Involve Meaningful Collaboration and Consultation with Municipal Water Providers - Continued collaboration and consultation with the Basin States, water users, Mexico, Tribes, NGOs, and stakeholders - including municipal water providers - throughout the Basin is crucial for a successful NEPA process and implementation of the Post-2026 Operations. The Post-2026 guidelines would benefit from the creation of a Basin-wide Municipal Sector Committee. This Committee should be in addition to Reclamation's consultation with the Governor's representatives from each Basin State.	Gilbert Arizona Public Works	Lauren Hixson
20963	4	CONSOTHER - Consultation and Coordination	Establish as part of the NEPA process working groups around particular areas of expertise and sectors that can assist with the development of the new framework and evolve into standing working groups that guide the framework's implementation.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	5	CONSOTHER - Consultation and Coordination	Sonoran Institute specifically recommends that creation of three working groups, which the Sonoran Institute would be willing to participate in: i. A water resilience working group that explores strategies that allow municipalities, agriculture, Tribal Nations, and NGOs to enter into voluntary, temporary, and compensated agreements to share water supplies, storage, and infrastructure. Such agreements can contribute towards a more holistic, robust, and adaptive framework by providing communities with the tools to address immediate water-related impacts of drought. This working group could help inform accompanying Congressional legislation that would remove restrictions to Tribal participation in such agreements and ensure that any federal authorization or funding of such agreements does not limit participation by any interested party. ii. A working group that identifies impacts of reduced Colorado River water use on resources in Mexico and ways to avoid, minimize, or mitigate these impacts. While we recognize that the NEPA process is focused on domestic actions, since 1979 federal agencies have been required by Executive Order 12114 to evaluate transboundary impact of significant actions. This working group could suggest actions that Mexico and the United States could consider as part a successor agreement to Minute 323 critical to the successful implementation of the next Colorado River management framework.5 iii. A working group around outreach and engagement strategies that would be dedicated to jointly assessing, implementing, and evaluating public participation and transparency strategies. The goal would be to develop a holistic stakeholder engagement strategy to inform, increase awareness, and engage stakeholders in management planning.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	6	CONSOTHER - Consultation and Coordination	Proactively identify emerging topics or issues that could be the subject of convenings, research, or activities that generate innovative ideas to inform the process, and encourage universities, non-governmental organizations, and other stakeholder groups to lead such complimentary efforts. Such topics or issues could be identified as part of the Bureau's summary report on scoping comments.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20976	8	CONSOTHER - Consultation and Coordination	The Post-2026 Process Should Involve Meaningful Collaboration and Consultation with Municipal Water Providers The process to develop Post-2026 operational guidelines would benefit from a mechanism and process to solicit specific input from municipal water providers. AMWUA suggests creation of a Basin-wide Municipal Sector Committee to serve as a forum for municipal water providers to share their unique and critical perspectives to Reclamation during the NEPA process, and when needed during the Post-2026 operational period. Cities are best positioned to represent the interests of the millions of residents they serve. This Committee should be in addition to Reclamation's consultation with Tribal representatives and with the Governor's representatives from each Basin State and is not intended to supplant the input or authority of these representatives.	Amwua One for Water	Warren Tenney
20976	9	CONSOTHER - Consultation and Coordination	Continued collaboration and consultation with the Basin States, Mexico, Tribes, NGOs, stakeholders, and water users - including municipal water providers - throughout the Basin is crucial for a successful NEPA process and implementation of the Post-2026 operations. The Colorado River Basin has successfully avoided large-scale litigation for decades, and consultation and collaboration should remain a preferred alternative to adversarial judicial approaches to resolving issues on the Colorado River.	Amwua One for Water	Warren Tenney
20976	10	CONSOTHER - Consultation and Coordination	The challenges facing the Colorado River affect all of us. We must work together to develop operational guidelines that allow for flexibility, reliability, equity, and cooperation among and for all that rely on this precious resource. We look forward to continued engagement with Reclamation throughout this process.	Amwua One for Water	Warren Tenney

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20985	1	CONSOTHER - Consultation and Coordination	THE PROCESS FOR DEVELOPING THE POST-2026 OPERATIONAL GUIDELINES MUST BE INCLUSIVE, EQUITABLE AND TRANSPARENT. Historically, there have been winners and losers when it comes to inclusion and influence on the development of policies and practices for the management of the Colorado River. Colorado River contractors and entitlement holders have not been represented equally in discussions over the use of Colorado River water. Some have been given a great deal of attention, while others have been left out entirely. This disparity is exacerbated by the fact that many of those that have been given full access to the process are the most junior users on the River while many of the most senior users have been excluded. The exclusion of senior users might otherwise be fine if their water uses were not at risk, but we know that is not the case- every water user was at risk of reduction under the Bureau's SEIS alternatives and will likely continue to be at risk in the EIS process. These disparities between users cannot be made worse in the Post-2026 process. The process must include all water users in both the Lower and Upper Basins, tribes, and Mexico, and must also ensure full and equitable participation. Further, when water users are left out of important discussions, they should be informed of what was discussed, what policies were developed and what actions will be taken, if any. Transparency, notice and an opportunity to respond should be paramount. It is also important to note here that state representatives do not always adequately and fully represent the interests of all water users within their state. The District understands that doing so is a difficult task given the unique and disparate interests of each contractor and entitlement holder. By ensuring an inclusive and equitable process, this gap in representation can be remedied. The Post-2026 Guidelines will most certainly impact every user on the River in some way, and likely in varying degrees, for decades to come. The discussion, development, and negotiation of the Post-2026 Guidelines could not be more important and significant to the District. The magnitude of the impact and outcome of this process requires an inclusive, equitable and transparent process.	Bard Water District	meghan noblelaw.com; Ray Face
20993	7	CONSOTHER - Consultation and Coordination	Recognizing that it will require collaboration across the entire system to resolve our current challenges, we in the Yampa/White/Green Basin Roundtable stand ready to do our part. We intend to support fully a unified approach to resolving this crisis, as a member of the Colorado River District, the State of Colorado, the Upper Basin of the Colorado River System and that System as a whole. We commit to work with the Bureau, the UCRC, and representatives of Upper and Lower Basin States to find solutions that will be practical and sustainable, and that benefit all people in the Colorado River System.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21001	4	CONSOTHER - Consultation and Coordination	The Guidelines will not be the sole answer to challenges afflicting the Colorado River Basin. Reinforcing and parallel activities will be critical to support the Basin's overall stability. The Bureau's post-2026 process should anticipate and reinforce parallel processes led by states, agencies, NGOs, Tribes, corporations, municipalities, and others.	Bonneville Environmental Foundation	Todd Reeve
21094	9	CONSOTHER - Consultation and Coordination	The Tribe also looks forward to learning more about the "Federal-Tribes-States Group" and hearing how this will assist the tribes in becoming more involved in the Colorado River Basin discussions. We would like to see this group become more than another avenue for sharing information.	Southern Ute Indian Tribe	Melvin Baker
21124	12	CONSOTHER - Consultation and Coordination	Finally, we strongly suggest that the new EIS be prepared by an integrated team that accesses federal and state (and perhaps university) scientific and operational expertise such that the best available science is used to evaluate alternative reservoir operations policy. Relevant expertise can be found in the state administrative agencies, GCMRC, the staff of the Upper Colorado and San Juan endangered species recovery programs and the Lower Basin MSCP, and the faculty and research staffs of some universities.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21151	6	CONSOTHER - Consultation and Coordination	The Hopi Tribe supports the recent efforts of the Bureau of Reclamation to create a forum for the Federal Government, the States, and the Basin Tribes to share information and find solutions for the future operations of the system.	Hopi Tribe	Timothy Nuvangyaoma
17202	8	COOPAGENCY - Cooperating Agencies	CREDA and its members support Reclamation's inclusion of the Western Area Power Administration (WAPA) as a cooperating agency	CREDA Colorado River Energy Distributers Association	Leslie James
20490	9	COOPAGENCY - Cooperating Agencies	NPS requests to be closely involved in development of alternatives. These resources include, but are not limited to, fish and wildlife, water quality, vegetation, wildlife habitat, geological features, geomorphic processes, cultural, paleontological, visitor experience, recreational and ethnographic resources in the affected national park units.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	11	COOPAGENCY - Cooperating Agencies	For these reasons, NPS affirmatively accepted the Bureau of Reclamation's invitation to be a cooperating agency in this planning process in a separate letter on July 26, 2023, pursuant to the National Environmental Policy Act (NEPA) 40 CFR 1501.8, and consulting party status pursuant to Section 106 and 110 of the National Historic Preservation Act (NHPA).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20952	1	COOPAGENCY - Cooperating Agencies	In our letter, we respectfully request to be a cooperating agency to support Reclamation in the identification and analysis of issues to be addressed in the EIS, in addition to our independent responsibilities under Section 309 of the Clean Air Act to review and comment publicly on all Draft Environmental Impact Statements.	Environmental Protection Agency Region IX	Robin Truitt

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Form 1	-	CRTRIBE - Cultural and Tribal Resources	These communities, which include neighboring Tribal Nations, would suffer significant losses if recreation is lost or decreased due to water elevation levels.	Blue Ribbon Coalition	
Form 3	-	CRTRIBE - Cultural and Tribal Resources	-The EIS should acknowledge the extensive resources that have emerged in Glen Canyon. In the years since Lake Powell reservoir has declined, natural wonders have reemerged like Cathedral in the Desert, Gregory Natural Bridge, as well lush riparian ecosystems, and priceless archeological sites.	Glen Canyon Institute	
Form 5	-	CRTRIBE - Cultural and Tribal Resources	5. Allocating Native American water rights by subtracting that water from current diversions, or, by paying tribes to keep their water in the river.	Save the Colorado	
11	4	CRTRIBE - Cultural and Tribal Resources	There should be a schedule for the tribes to receive the water they need for their permanent homelands. Their water is currently being used by the dominant society.	Living Rivers	John Weisheit
12	2	CRTRIBE - Cultural and Tribal Resources	And then to echo with the previous comments, the comments are points. just making sure that that we put tribes. not only in a seat of the table, but potentially first. you know, they've had to deal with making more with less and there are steps in the right direction. The Gila River Indian Communities Agreement to put solar covered panels over canals to eliminate evaporation and increase electricity, provide some mechanism to increase their sovereignty and increase their economic independence. And so yeah, that's my other general comment is to make sure that we're giving tribes the tools that they need to thrive.		Greg Bolla
494	5	CRTRIBE - Cultural and Tribal Resources	Cultural and Historical Significance: Lake Powell holds immense cultural and historical significance, with numerous Native American sites and artifacts submerged beneath its waters. By ensuring higher water levels, we can protect these sacred locations and preserve the tangible connections to the past for indigenous communities and researchers alike.		Matthew Riddle
782	9	CRTRIBE - Cultural and Tribal Resources	Fifth, USBR must distribute Native American water rights settlements from, and subtract those rights from, currently diverted water users, not by or from new diversions or depletions of water out of the river. Alternatively, if tribes wish, they can be paid to keep their water in the river which would be a less impactful solution to all other users and hugely ecologically beneficial to the river itself.	Save the Colorado	Gary Wockner
799	3	CRTRIBE - Cultural and Tribal Resources	The analysis of impacts resulting from the elimination of impoundments in Glen Canyon and its side canyons must consider gains to both archaeological and historic indigenous use patterns.		Janet
832	5	CRTRIBE - Cultural and Tribal Resources	5. Allocating Native American water rights by subtracting that water from current diversions, or, by paying tribes to keep their water in the river.		Gary Wockner
2824	2	CRTRIBE - Cultural and Tribal Resources	The Hualapai Settlement Act also authorized the appropriation of $312 million of federal monies for a trust fund the Tribe may use to construct an infrastructure project to deliver up to 3,414 acre-feet of water from the Colorado River to the Reservation, and for other purposes. The project, as currently planned by the Tribe, will divert water from the Colorado River on the Reservation where Diamond Creek enters the River and then deliver it through a 70-mile pipeline both to Peach Springs-the community where virtually all the Tribe's members reside on the Reservation-and to Grand Canyon West, which is the Tribe's primary economic enterprise on the Reservation. The water allocated to the Tribe in the Act is absolutely essential to enable the Hualapai Reservation to serve as an economically self-sufficient permanent homeland for the Hualapai Tribe and its members.	Hualapai Indian Tribe	Hannah Waldrop
2824	3	CRTRIBE - Cultural and Tribal Resources	The Hualapai Reservation encompasses approximately one million acres in northwestern Arizona. All lands on the Reservation are tribal trust lands; there are no allotments or fee in.holdings. The Colorado River forms the 108-mile northern boundary of the Reservation through a portion of the Grand Canyon.	Hualapai Indian Tribe	Hannah Waldrop
2824	4	CRTRIBE - Cultural and Tribal Resources	The Reservation is arid and has no significant surface streams other than the Colorado River. It has very limited groundwater resources, which the Tribe now depends on for all its needs. The Tribe's groundwater wells are a depletable resource and well levels on the Reservation have been dropping for years. The Tribe's principal residential community at Peach Springs relies exclusively on three groundwater wells near the Reservation's southern boundary. Those wells were installed in 1975, so the piping for the well system is 48 years old and has failed in the recent past, leaving the community without water for several days. One of the wells has also suffered episodes of dangerous E-coli and coliform contamination. When that well is out of service because of contamination, the Tribe is unable to supply sufficient water to the Peach Springs community and has been forced to implement strict mandatory conservation measures. Because this groundwater is the only source of water for residential needs on the Reservation, the Tribe is very vulnerable to any short-term interruptions in supply from these wells, and also to the long-term decline in the water levels in the aquifer.	Hualapai Indian Tribe	Hannah Waldrop

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2824	7	CRTRIBE - Cultural and Tribal Resources	The major deficiency thus far in the Department's consideration of how to respond to shortages in the Colorado River has been its failure, as an indispensable part of any plan for future Colorado River operations, to protect the security of Colorado River water allocated by congressionally approved water settlements to Arizona tribes, including to the Hualapai Tribe. Indeed, protecting tribal water rights should be a priority for the Department, which has a trust responsibility to safeguard these congressionally approved tribal water allocations-allocations which quantify the tribes' water rights under the well-established Winters doctrine. The water allocated to tribes in these settlements is generally taken into trust for the tribes under statutes ratifying the settlements, as was done in the Hualapai settlement. See Pub. L. No. 117-349, SS 5(a)(l)(D). Thus, these water allocations are federal trust assets.	Hualapai Indian Tribe	Hannah Waldrop
2824	8	CRTRIBE - Cultural and Tribal Resources	The Department's obligation to protect tribal water rights should be viewed against the historical backdrop of Department's too often failure to do so in the past. In 1908, the Supreme Court held in Winters v. United States, 207 U.S. 564 (1908), that Indian tribes have water rights under federal law that are legally senior to non-Indian uses commenced after the date the tribe's reservation was established-water rights which the tribes can use to satisfy their future needs. But the United States in the decades immediately following Winters egregiously failed to assert in court the rights of tribes in Arizona and other states against non-Indian water appropriations that were legally junior to the rights of tribes as determined in Winters.	Hualapai Indian Tribe	Hannah Waldrop
2824	9	CRTRIBE - Cultural and Tribal Resources	In Arizona v. California, 373 U.S. 546, 595-601 (1963), the Supreme Court expressly reaffirmed and followed Winters and its core holding that tribal reserved water rights are senior to any other rights commenced after the tribes' reservations were established. But when the United States intervened in the case to protect federal interests, the Justice Department failed utterly to assert the water rights of the Hualapai Tribe to water in the Colorado River-although it did assert rights to water for several downstream Indian tribes and several non-Indian federal uses.	Hualapai Indian Tribe	Hannah Waldrop
2824	10	CRTRIBE - Cultural and Tribal Resources	In the past five decades following the Arizona v. California decision, tribes have themselves actively and vigorously defended their reserved water rights in court. During this period, over thirty-five tribes have negotiated settlement agreements, approved by Congress, quantifying their Winters doctrine reserved rights. Twelve of these settlements have been for tribes in Arizona; most of these settlements contain allocations of CAP water to the tribe. It is the obligation of the Department to protect the Colorado River water rights allocated to tribes under these settlements. As part of bargaining for these settlements and in order to secure Federal, State, and congressional support for the settlements, the Arizona tribes, including the Hualapai Tribe, have generally been required to waive all past claims against both the United States and non-Indian water users for past injuries to or encroachment upon the tribes' legally senior water rights, as well to waive as all past claims against the United States for the abject historical failures of the federal government to protect their rights.	Hualapai Indian Tribe	Hannah Waldrop
2824	11	CRTRIBE - Cultural and Tribal Resources	hese waivers constitute major concessions by the tribes because they have allowed legally junior non-Indian users to continue to use water to which the tribes, by law, hold a senior legal priority. Because of the historic failure by the United States throughout the 20th century to protect tribal water rights, non-Indians have been able to develop long-established water uses. And the Hualapai Tribe and other tribes were then forced to recognize those non-Indian uses in their negotiated water settlements by waiving their legal rights to contest those legally junior uses in order to obtain the political support from Arizona officials and stakeholders, and from the State's congressional delegation, that was necessary to enact the settlement. Since the waivers given by the tribes are permanent and binding and cannot now be rescinded by the tribes, the allocation of water that the tribes received in exchange for those waivers should not now be subject to a de facto rescission in the form of severe reductions, or even elimination, of the tribal water rights simply because the water allocated to tribes is lower priority NIA water and thus the most vulnerable water to whatever shortages the Department imposes on the CAP. Rescinding or eliminating tribal allocations of water solely because it is NIA priority water would impose a fundamental unfairness on the tribes that have entered these settlements in good faith: on the one hand, the tribes would remain fully bound by all of the waivers they have given to the State and Federal parties in these settlements, but on the other hand, the benefit of the bargain the tribes received in exchange for these waivers-a right to take delivery of a bargained-for and agreed-upon allocation of Colorado River water in a quantity necessary to sustain a permanent livable homeland on their reservations-would be drastically reduced, if not entirely eliminated. The non-Indian and Federal parties would continue to get everything they bargained for in these settlements and the tribes would get little-or even nothing-in return.	Hualapai Indian Tribe	Hannah Waldrop
3308	1	CRTRIBE - Cultural and Tribal Resources	The Colorado River is a national treasure, sacred to many tribes of indigenous people.		Kathie Adams
7478	3	CRTRIBE - Cultural and Tribal Resources	We need to honor First Nation peoples right to water and allow them their sacred land for their religious practices.		Hazel E Cross
15739	1	CRTRIBE - Cultural and Tribal Resources	indigenous and other people with historic ties to the upper Colorado, and who live along the banks of major tributaries should also be accommodated to ensure their economic and physical well being.		Veronica Stewart

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16940	3	CRTRIBE - Cultural and Tribal Resources	USBR must distribute Native American water rights settlements from, and subtract those rights from, currently diverted water users, not by or from new diversions or depletions of water out of the river.		Jed Koller
17241	22	CRTRIBE - Cultural and Tribal Resources	Other resource impact analyses should include (but not be limited to): - Tribal assets including lands and waters and cultural resources; - Cultural resources including native plants used by Tribes to sustain traditional practices;	National Audubon Society	Jennifer Pitt
17337	4	CRTRIBE - Cultural and Tribal Resources	2. The EIS should recognize the value of cultural and natural sites that have reemerged in Glen Canyon - with the dropping levels of Lake Powell, countless indigenous cultural sites and natural wonders that have been drowned under Lake Powell for decades have reappeared. The Bureau of Reclamation should recognize the value of restoring Glen Canyon, which has been called "America's lost national park" and a place equivalent or greater in grandeur to its downstream neighbor, the Grand Canyon, with perhaps even greater significance to local tribes. While Lake Powell has become a major hub for recreation, its elimination would not mean huge economic losses--Glen Canyon has the potential to become a national park with as much visitation as Lake Powell. Beyond the economics, and perhaps most importantly, Glen Canyon is one of our world's greatest natural wonders, which has been tragically been damaged by its decades-long inundation. The inherent value of allowing this place (and its vital ecosystems) to heal should be reason enough to bypass the dam.		Slade G Sheaffer
17606	1	CRTRIBE - Cultural and Tribal Resources	Being Navajo and seeing the good this lake does for not only my people, but thousands of others is something I will fight for.		Brianne Brode
17606	3	CRTRIBE - Cultural and Tribal Resources	I support this movement and I hoping we can save lake powell. Itâ€™s too important and sacred to us Navajos to potentially lose.		Brianne Brode
17610	1	CRTRIBE - Cultural and Tribal Resources	I am writing to urge strong protection of habitats that protect birds, fish and wildlife as well as small communities and native people.		Ginny Fay
20234	2	CRTRIBE - Cultural and Tribal Resources	It should also acknowledge the resources that have emerged in Glen Canyon, including and beyond the ones I was lucky enough to witness before they were resubmerged.		Murray Smith
20268	4	CRTRIBE - Cultural and Tribal Resources	we have found priceless Navajo and Puebloan structures and other archeological sites,		Rowan Epstein
20341	6	CRTRIBE - Cultural and Tribal Resources	Reclamation's analysis should also conform with the Law of the River and the priority system to ensure a factual accounting of Indian Trust Assets. Analysis of impacts to Native American tribes needs to accurately assess and reflect differing water rights and priorities to the Colorado River and/or other surface and groundwater rights. Not all Native American tribes have the same water rights or priority to the Colorado River, and these critical distinctions need to be reflected in the EIS,	Imperial Irrigation District	Shields, Tina L
20357	1	CRTRIBE - Cultural and Tribal Resources	1. Allow Indigenous people and Tribes to access and utilize their water rights from the Colorado River now and in perpetuity.		Dylan Mori
20438	2	CRTRIBE - Cultural and Tribal Resources	While the Colorado River community as a whole has to learn to live with less, Tribal Nations must also be allowed the same opportunities to develop their federal reserved water rights to provide clean drinking water, adequate sanitation, clean energy, and economic opportunities that have been historically prioritized to the rest of the Basin community.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	8	CRTRIBE - Cultural and Tribal Resources	At minimum, achieving the contemporary goals and needs of the Basin community will require measures that go beyond the purpose of the 2007 Interim Guidelines to: 1. Recognize Tribal sovereignty by: a. Providing Tribal Nations their rightful role in negotiations and decision-making processes that influence and/or affect their rights, authorities, and interests in Colorado River water; b. Acknowledging Tribal rights to self-determination; and c. Protecting and providing pathways for the realization of all Tribal apportionments in the Colorado River Basin.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	9	CRTRIBE - Cultural and Tribal Resources	2. Provide opportunities to steward and support ecological, spiritual, and cultural values to ensure the environmental integrity of watersheds and spiritual connection to Basin resources;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	16	CRTRIBE - Cultural and Tribal Resources	5. Identify stewardship principles that recognize environmental, spiritual, and cultural values that contribute to the long-term integrity of the Basin;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
20438	21	CRTRIBE - Cultural and Tribal Resources	4. Integrate environmental stewardship practices into operational and management decisions that ensure respect for and protection of ecological, spiritual, and cultural values within the Basin; and	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	29	CRTRIBE - Cultural and Tribal Resources	3. How currently developed, undeveloped, and unresolved Tribal reserved water rights will be accounted for in operational and decision-making considerations;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	30	CRTRIBE - Cultural and Tribal Resources	f. Federal processes to account for and deduct Tribal Nations' federal reserved water rights from the state apportionments of system water used for decision making.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20469	4	CRTRIBE - Cultural and Tribal Resources	* preservation of archaeological, cultural resources, and traditional cultural properties along the river corridor, sacred to the eleven tribes of Grand Canyon,	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20476	2	CRTRIBE - Cultural and Tribal Resources	It is critical for the avajo Nation to continue to develop its water rights. It is also important to acknowledge and understand that the avajo ation has unquantified water rights in the Upper and Lower Colorado River Basins. The development of Post- 2026 Operational Guidelines and Strategies presents a unique opportunity to advance water security for the Navajo people, economy, and environment, and live up to the promises of Executive Order 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All). In addition to supporting safe drinking water and wastewater systems for homes and communities, undeveloped and unquantified water rights should be considered.	Navajo Nation	Buu Nygren
20476	5	CRTRIBE - Cultural and Tribal Resources	and fluctuating reservoir elevation levels have cultural and environmental consequences.	Navajo Nation	Buu Nygren
20490	39	CRTRIBE - Cultural and Tribal Resources	The fluctuating water levels and increasing amount of exposed shoreline in Lakes Powell and Mead over the past two decades have heightened NPS concerns about sites of cultural and historic significance to indigenous communities, as well as cultural resources that document the early history of the parks and more modern objects such as a WWII-era B-29 bomber. As lake levels have dropped, cultural resources are exposed to looting, other forms of vandalism, and damage from environmental conditions. Much of the once fully inundated areas that are now exposed were minimally surveyed prior to filling of the reservoirs. The NPS has a responsibility under NHPA and the Archeological Resources Protection Act (ARPA) to inventory and document cultural resources located on these lands as they re-emerge and to monitor, mitigate, and manage these resources for their protection. Effects of declining water levels on NPS natural resources, ranging from exposure of paleontological features to increased abundance of invasive plant species require additional inventory, documentation, management, and protection. Lake Mead has documented damage to significant cultural sites in the park due to off-road vehicle use. These additional acreages of exposed shorelines have also experienced increased soil erosion and increasing dust and air quality concerns. The dropping water tables have impacted water wells and are altering vegetation that may impact authorized grazing and unwanted access of livestock to closed areas.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	42	CRTRIBE - Cultural and Tribal Resources	Less-frequent HFEs will result in less riverbank deposition of silt and sand and less wind transport of sediment (especially as riverbank vegetation increases in density), increasing the likelihood of exposing archeological sites and other cultural resources to erosion and vandalism. For this reason, there is an increased risk of loss of integrity in these known archeological sites. There may also be many more of these resources that have never been exposed or formally documented that could be lost as they are exposed.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20496	1	CRTRIBE - Cultural and Tribal Resources	The EIS should acknowledge the extensive resources that have emerged in Glen Canyon. For four years I explored the Glen Canyon region guided by 100-year-old expedition journals and photos. This allowed me to understand how much the landscape has changed because of human impacts. It also helped me contextualize the re-emergence of Glen Canyon as the water in the reservoir declined. In total, I examined and documented dozens of Glen Canyon Tributaries and hundreds of miles of its mainstem. Many of these I returned to frequently to examine the incremental exposure of what was once lost beneath Lake Powell. In-depth interviews and hikes with archaeologists, local Tribal members, water managers, and scientists helped me understand what I have witnessed: cultural sites of deep significance to local tribes (Dine, Hopi, Paiute, Ute, and Zuni), historic routes like the Hole-in-the-Rock built by Mormon pioneers who settled in the area, and detritus from the Glen Canyon gold rush in the 1890s. Among the geologic wonders I witnessed were Cathedral in the Desert and Gregory Natural Bridge, and unnamed waterfalls that are now once again inundated by the reservoir.		Morgan Sjogren
20496	12	CRTRIBE - Cultural and Tribal Resources	The lower Colorado River Basin, and in particular California, continues to overdraft more water than the Colorado River contains. All the while, the states are also utilizing tribal water that has yet to be legally allocated, as is the case for instance with the Navajo Nations share of the Colorado River in Arizona. The Navajo Nation is the largest Native American tribe in the nation, and over 40% of its enrolled tribal members still do not have access to running water. I reported on the ways drought and current management adversely impact the Navajo Nation and other tribes for Sierra Magazine (here .		Morgan Sjogren
20502	1	CRTRIBE - Cultural and Tribal Resources	As Reclamation's Notice of Intent (NOI) notes, unprecedented drought and low runoff conditions necessitate significant actions to improve system stability and resiliency. Any such actions must, however, take into account the significant senior water rights, both quantified and unquantified, that the Nation and other Tribes in the Colorado River Basin possess, as well as the fact that more than a century of non-Indian development, aided by Reclamation's endeavors, have curtailed and compromised the full use of these rights. The Post-2026 process provides Reclamation with the opportunity to correct these historic errors in Colorado River management.	Tohono O'Odham Nation	Verlon Jose
20502	3	CRTRIBE - Cultural and Tribal Resources	(2) adequately analyze the impact of any proposed alternatives on both the Nation's existing water settlement and federal reserved rights; and (3) take measures to protect these assets.	Tohono O'Odham Nation	Verlon Jose

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20502	4	CRTRIBE - Cultural and Tribal Resources	It is incumbent on Reclamation to ensure that any new Post-2026 Guidelines protect the delivery of the Nation's SAWRSA entitlement, or ensure that the Nation is adequately compensated for any delivery shortfalls. Moreover, Reclamation must appropriately analyze the impacts of any alternatives on the Nation's federal reserved rights and Indian Trust Assets (as identified through appropriate investigation).	Tohono O'Odham Nation	Verlon Jose
20502	6	CRTRIBE - Cultural and Tribal Resources	In practice, the 2007 Interim Guidelines fell short of these goals by crafting and modeling reductions to Central Arizona Project (CAP) deliveries without adequately addressing Reclamation's responsibility to ensure that the Nation will continue to receive its full water delivery entitlement in the event of shortages, as required by the Nation's settlement. In addition, the 2007 Interim Guidelines did not take into account the potential for shortages to lead to groundwater overdrafts near the Nation's reservations, thus significantly impacting the Nation's as-yet unquantified federal reserved water rights. While the 2007 Interim Guidelines purported to examine impacts to tribal interests through what it referred to as "Indian Trust Assets" and by treating Tribes as "environmental justice populations" separate from other minority or low-income populations, these methodologies relied on faulty or overly narrow assumptions, and thus failed to take the full scope of impacts on tribal interests into account.	Tohono O'Odham Nation	Verlon Jose
20502	7	CRTRIBE - Cultural and Tribal Resources	I. Reclamation must prioritize the Nation and other Tribes' interests in preparing and issuing new Guidelines, or otherwise risk breaching the federal trust responsibility. As confirmed by federal court decisions, as well as Reclamation's own internal guidance, the federal government's trust responsibility extends to the protection of tribal water rights, irrespective of other competing claims to water.13 The overarching lens through which the 2007 FEIS viewed impacts to the Nation and other federally recognized Indian Tribes was through what it referred to as "Indian Trust Assets," (ITAs) namely, "assets held in trust by the federal government for federally recognized Indian tribes or individual Indians,"14 and as "environmental justice populations."15 According to Reclamation's NEPA Handbook: Reclamation is committed to carrying out its activities in a manner that avoids adverse impacts to ITAs, when possible, and mitigates or compensates for such impacts when it cannot avoid the impacts. All impacts to trust assets, even those considered nonsignificant, must be discussed in the trust analyses in NEPA documents and appropriate compensation or mitigation implemented.16 Indian Trust Assets analyzed for the purposes of the Final Environmental Impact Statement for the 2007 Interim Guidelines (2007 FEIS) included "federal reserved Indian rights to Colorado River water including rights established pursuant to Arizona v. California, Colorado River water Tribal delivery contracts where such contracts are part of a congressional approved water rights settlement; and Indian reservations."17 As the NEPA Handbook acknowledges, all impacts to trust assets, even those that Reclamation may consider "nonsignificant," must be discussed in any EIS, and "appropriate compensation and mitigation implemented." In addition to examining impacts to trust assets, Reclamation must prioritize the protection of these assets. Courts have repeatedly held and affirmed the priority that federally reserved water rights have over competing water rights.18 While Congress may sometimes require the federal government to "carry water on at least two shoulders" in representing both tribes and nontribal interests,19 "the government remains under a firm obligation to represent [a Tribe's] interests forcefully despite its other representative obligations," and its failure in this regard may constitute a breach of its trust obligation.20 Unfortunately, the 2007 FEIS employed flawed methodology to catalogue ITAs and to analyze potential impacts resulting from the alternatives on Tribes, appropriate "compensation or mitigation," and environmental justice impacts. First, while the Nation's SAWRSA settlement is included as an ITA, the 2007 FEIS did not account for or address Reclamation's responsibilities to ensure the full delivery of the Nation's entitlement in times of shortage, or compensation to the Nation in the event that such deliveries are not carried out. Second, while ITAs include "Indian reservations," the 2007 FEIS did not appear to assess the impact of the action alternatives on unquantified Winters rights21 on Indian reservations that are not immediately adjacent to the Colorado River. This cramped interpretation of Indian Trust Assets ultimately led to an incomplete analysis concerning the impacts of each alternative on the Nation and its water rights. As Reclamation has correctly noted, the Nation and other Tribes were left out of the decision-making process for crafting the 2007 Guidelines. It is incumbent on Reclamation, in fulfilment of its trust responsibility to Tribes, to prioritize tribal interests as develops new draft Guidelines, and to appropriately analyze the full panoply of these interests. Such a responsibility is particularly important given Reclamation's stated intent to develop "more robust measures to protect reservoir levels."22 Such measures must not be implemented at the expense of Indian Trust Assets.	Tohono O'Odham Nation	Verlon Jose

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20502	9	CRTRIBE - Cultural and Tribal Resources	. Any new EIS must adequately address the Nation's unquantified Winters rights. As noted above, the ITAs analyzed in the 2007 FEIS included "federal reserved Indian rights to Colorado River water including rights established pursuant to Arizona v. California, Colorado River water Tribal delivery contracts where such contracts are part of a congressional approved water rights settlement; and Indian reservations." The 2007 FEIS did not specifically explain the extent to which unquantified Winters rights are included (or not included) within these categories, but later concluded, in a sweeping fashion, that "no vested water right of any kind, quantified or unquantified, including federally reserved Indian rights to Colorado River water, rights pursuant to the Consolidated Decree or Congressionally-approved water right settlements utilizing CAP water, will be altered as a result of any of the alternatives under consideration."27 Such an unsupported conclusion is especially problematic for Tribes like the Nation, which has significant unsettled (and unquantified) federal reserved rights. As noted above, prior to the construction of the CAP, off-reservation groundwater pumping by non-Indians severely damaged the Nation's reservation, water rights, and its ability to make use of them. The United States affirmatively recognized the harm caused by these injuries, and (again, as noted above) in some cases filed suit to stop them. At the same time, the federal government pointed to the construction of the CAP as a means to alleviate these harms, testifying before Congress that "Project delivery of Colorado River water will help relieve present overpumping of the declining ground water reserve in Maricopa, Pinal, and Pima Counties, Arizona."28 Further CAP reductions will no doubt lead to increased groundwater drawdowns near the Nation's reservations, which would in turn have a significant negative impact on the Nation's federal reserved rights. Indeed, as has been widely reported, Arizona farmers have anticipated this outcome and are either returning to groundwater pumping or preparing to do so, in some cases with federal financial support to drill additional wells.29 2007 FEIS and Guidelines failed to address this possibility not only in delineating the scope of ITAs, but also analyzing the environmental consequences of agricultural impacts by assuming, incorrectly, that CAP reductions would lead to fallowing, rather than increased reliance on groundwater. The 2007 FEIS agricultural modeling framework examined the impact of various allocation alternatives on agriculture in Arizona, and noted that "[k]ey to this impact analysis is the assumption that the most conservative way to estimate impacts is to assume that, if a shortage occurs, farmers would react by fallowing irrigated lands."30 While Reclamation acknowledged that "there are other sources of water that may be used by farmers in order to offset shortages," such as "by pumping additional groundwater," it nevertheless concluded that, because it was "difficult to project exactly how individual farmers, irrigation districts, or each of the Lower Division states may mitigate potential, future agricultural impacts from shortages," it would choose instead to assume "that other sources of water would not be available."31 Reclamation now has the opportunity to correct these errors in developing the Post-2026 Guidelines and in analyzing their potential impact on both Indian and non-Indian agriculture, and it is incumbent on Reclamation to do so.	Tohono O'Odham Nation	Verlon Jose
20700	7	CRTRIBE - Cultural and Tribal Resources	The Colorado River and its tributaries are waterways with ecological, spiritual, and cultural significance since time immemorial. While providing incredible benefits to society, the Colorado River has its own intrinsic value as a river. As an example, the Quechan Indian Tribe5 stated in its pre-scoping comment letter The Colorado River has been the lifeblood of the Quechan people since time immemorial, and we have a deep and abiding responsibility to be good stewards of the River--for the Tribe and its members, for the species and ecosystems that it sustains, and for the benefit of our fellow tribes and non-Indian neighbors throughout the Basin. This captures just a few of the values that should be elevated in the post-2026 process.	Grand Canyon Trust	Jen Pelz
20700	25	CRTRIBE - Cultural and Tribal Resources	However, given the historic exclusion of the tribes and their later in time development of their water entitlements (e.g. sometimes settling for more junior rights such as CAP), equity principles could be applied to not include tribal water rights and entitlements in mandatory reductions, as an example. However, instead tribal water rights and entitlement mechanisms should be developed to ensure that tribes can realize the value of their entitlement through voluntary contributions of water and for their non-use.	Grand Canyon Trust	Jen Pelz
20738	7	CRTRIBE - Cultural and Tribal Resources	The next management framework must also acknowledge that the Colorado River system and individual water users have benefitted from over a century of free use of un- and under developed tribal water rights. As a matter of basic equity and justice-and in recognition of the trust obligation the United States owes each Basin tribe-- a necessary component of all future management frameworks must therefore be the protection of tribal trust resources, including but not limited to tribal water rights. Any future management framework must therefore abjure the possibility of involuntary, out-of-priority cuts imposed on the water rights that our Tribe, and all Basin tribes, need to ensure that our reservations can be true homelands for our people.	Quechan Indian Tribe	Jordan Joaquin
20738	8	CRTRIBE - Cultural and Tribal Resources	The next management framework also needs to look beyond simply managing water deliveries and reservoir storage to include environmental and cultural needs. It is of the utmost importance to the Tribe and our members that the Colorado continues to flow as a living river.	Quechan Indian Tribe	Jordan Joaquin
20738	10	CRTRIBE - Cultural and Tribal Resources	It is vital that we preserve and enhance the habitat and species and the cultural connections between and among tribes, other communities, and the River. The potential effects on these critical resources of various proposed alternatives must therefore be carefully analyzed in any post-2026 EIS, and at a granular and localized manner free from the overgeneralizations that compromised the quality of the environmental analysis in the DSEIS.	Quechan Indian Tribe	Jordan Joaquin

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20738	13	CRTRIBE - Cultural and Tribal Resources	Because of the inescapable need for reductions in overall Colorado River water use, a clear mechanism for expanding the use of compensated forbearance agreements for currently un and under-developed tribal water rights is a tool that should be included as part of any preferred alternative selected for the post-2026 EIS. Our Tribe's forbearance agreement with the Metropolitan Water District (MWD) has allowed both the Tribe and MWD to benefit from the additional water rights the Tribe secured in the 2005 Settlement Agreement among the Tribe, MWD, the Coachella Valley Water District, and the United States without increasing the net consumptive demand on the river system. Currently, other tribes are largely forced to develop new consumptive uses of water before they can benefit from their water rights or utilize them in creative ways off their reservations, an incentive system that perversely pits necessary tribal economic and social development against the Basin's need to decrease overall water use. It would perpetuate fundamental historical injustices to persist with a system that creates meaningful political disincentives to broader support for tribal development. And it is of course unconscionable that in 2023 there are tribes in the Basin who still lack the resources to provide clean and sanitary water for their members. Compensated forbearance agreements can generate needed revenue to support important tribal governmental programs, while reducing a significant source of upward pressure on consumptive demands, and better align incentives and interests among tribes and other Basin water users. This is an opportunity that should not be squandered.	Quechan Indian Tribe	Jordan Joaquin
20865	1	CRTRIBE - Cultural and Tribal Resources	Accordingly, the Bureau of Reclamation's consideration of Post-2026 operational strategies must take into consideration the Unites States' trust responsibility to Tribes and seek to implement management solutions on the Colorado River that will protect deliveries of Colorado River water supplies to the Tribes, including the Pascua Yaqui Tribe. Our request is also consistent with the Biden Administration's commitment to Tribes.	Pascua Yaqui Tribe	Peter Yucupicio
20865	3	CRTRIBE - Cultural and Tribal Resources	And where Colorado River water deliveries to Tribes may be reduced, assistance should be directly provided to Tribes to replace those water supplies through other means, particularly in cases where the reduction to a Colorado River water supply threatens Tribal public health, will result in damage to a Tribal economy, or would impair or impede the ability of a Tribe to reach a water rights settlement.	Pascua Yaqui Tribe	Peter Yucupicio
20899	13	CRTRIBE - Cultural and Tribal Resources	Cultural Values As aridification continues and Lake Powell recedes, newly emergent portions of Glen Canyon will reveal long-submerged cultural sites, such as rock art panels, granaries, habitation, and other sites. The EIS must analyze and provide for protection and conservation of those sites, consistent with applicable laws, as they emerge. The EIS must specifically analyze measures to protect sites against re-submersion and, in the absence thereof, the effects of repeated saturation and drying cycles on the integrity of cultural sites.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	16	CRTRIBE - Cultural and Tribal Resources	Alternatives Under Various Depletion Schedules and With Elimination of the Structural Deficit (evaporation) (3) an alternative that ensures tribes receive and can utilize reserved water rights needed for their permanent homelands and to protect the environment. This alternative must consider a scenario in which reserved water is used in various ways, including for development and for instream support of ecosystems.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	19	CRTRIBE - Cultural and Tribal Resources	The need to include an assessment of emerging ecological, cultural, and recreational resources in Glen Canyon, Cataract Canyon, Narrow Canyon, and the San Juan River. Since the 2007 Interim Shortage Guidelines, new resources have emerged in Glen Canyon that were not accounted for in the previous NEPA analysis. Given the significance of these resources under NPS responsibilities and the mandates of the Grand Canyon Protection Act, the Post-2026 Operational Guidelines NEPA analysis must recognize and include an analysis of the importance of the emerging recreational resources in the tributary rivers and canyons, including rafting and hiking in Glen Canyon, and recognize the impact that operational strategies will impact environmental resources including vegetation, wildlife, and archeological/cultural sites in Glen Canyon. Many of these resources were unaccounted for when Glen Canyon Dam was constructed and today require a different perspective on their management and protection.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	25	CRTRIBE - Cultural and Tribal Resources	Archeology Glen Canyon is home to thousands of archeological sites that have been inundated by the water behind Glen Canyon Dam. Many of these culturally significant archaeological sites, including structures and rock art, have emerged along with other resources6364. The Post-2026 Guidelines must recognize impacts of reservoir operations on these socially and culturally important resources. With the 65 foot rise of Lake Powell in Summer 2023, 30,000 acres65 of lake shore and tributary canyon were once again submerged, which re-drowned exposed archaeological sites, likely causing additional damage beyond what occurred when the reservoir first filled. The Glen Canyon landscape has cultural, social, and historical significance to multiple Colorado River Basin indigenous tribes, early Mormon settlers, and to many early explorers and river runners. The future management of these resources should include a different approach than was used in the late 1950's and early 1960's when the Department of the Interior only focused on 'recovery of artifacts". The Post-2026 Guidelines need to include active and consistent tribal input on the management of reservoir operations to protect all resources, not just the water.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	7	CRTRIBE - Cultural and Tribal Resources	Furthermore, the CAP supply is a critical component of tribal water right settlements and provides tribal homeland water to meet the needs of tribal communities in Arizona. Reclamation must perform an extensive analysis of the socioeconomic and public health and safety impacts that may fall to CAP water users, including CAP tribes that may experience reduced supplies and reduced revenues under alternatives proposed in the EIS. Similarly, Reclamation must undertake a comprehensive analysis of impacts to critical federal infrastructure, including specifically the CAP, that may result from the alternatives proposed under the EIS.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20926	3	CRTRIBE - Cultural and Tribal Resources	Thirty tribes have water rights but they have lacked the ability to enforce them. The priorities of these tribes should be an important part of the negotiations - they should have a seat at the table and their rights protected. As part of the discussion, the US government should invest in infrastructure projects (many which have been promised in the past but never completed). It is unconscionable that thousands of tribal members have to drive to water hauling stations every day because we have siphoned off their water to sustain big cities.		Mary Ann Garner
20929	2	CRTRIBE - Cultural and Tribal Resources	This obviously represents a stark transformation in the structures set up to extract water out of the river, and itÂ's important to not throw the baby out with the bathwater if we pursue this course of action. An example of this is the present perfected rights that give tribes priority over other water users. To usher in a new era of American prosperity, we need to come to terms with historical wrongs perpetrated in pursuit of misguided nationalistic goals. There are few examples that illustrate this more than our relationship with tribal nations. Putting a thumb on the scale allowing tribes to further pursue self-sovereignty and prosperity is crucial to how humanity, regardless of nationality, gets out of this quandary together. Preserving senior water rights for tribes while adapting legal structures to be more in line with reality is one small step we can take to do this.		Greg Bolla
20930	1	CRTRIBE - Cultural and Tribal Resources	The Colorado River ("River") is vital to the CRIT. The Mohave and Chemehuevi people have lived along the banks of the River in what is now the Lower Basin since time immemorial. Our Ancestors lived through droughts and floods while living and farming sustainably in this region for innumerable generations. The CRIT, now comprised of members from the Mohave, Chemehuevi, Navajo, and Hopi Tribes live, farm, run businesses including River-based recreation, and continue to conduct ceremonial and religious practices on our Aboriginal land near Parker, Arizona and on the CRIT Reservation. As Reclamation is well aware, the CRIT has federally reserved water rights, which are described by the Supreme Court in Arizona v. California as present perfected water rights to divert water. Reclamation has a trust obligation to protect the CRIT's water rights for our present and future use. To that end, we appreciate the ongoing dialogue between our two governments regarding the use of our water to assist in alleviating the impacts of drought and climate change. We were honored by the recent visit to our reservation by Commissioner Touton and applaud her stated desire to work with the CRIT on resolving barriers to our participation in these issues. It is our view that many of the themes raised in current discussions between our staffs on removing barriers to allow for our participation in basin-wide solutions addressing water shortage, are themes that must be discussed in development of Post-2026 Operational Guidelines and disclosed in the related Draft Environmental Impact Statement ("DEIS"). I. Issues That Must Be Addressed in the DEIS A. Ensuring the CRIT's ability to continue using up to its folly decreed water right. Aspects of water delivery, shortage conditions, potential regulation of water users, development and use of Intentionally Created Surplus, and System Conservation are expiring. As Reclamation and the Basin States are negotiating updates to these policies, Reclamation must avoid agreeing to any policy that would either reallocate water from the CRIT or prevent the CRIT from folly using its present perfected rights. The alternatives and analysis in the DEIS must include foll development and/or use of the CRIT's water allocation. B. Purpose and Need must reflect and/or acknowledge senior tribal water rights like the CRIT's. The statement of purpose and need must include a commitment to protect the priority of water rights, including the CRIT's present perfected rights in all administration of water rights in the Lower Basin. C. Alternatives that include uncompensated and/or authorized reallocation of water are not reasonable under NEPA and must not be included in the DEIS. NEPA requires alternatives to be reasonable. Any potential alternative seeking to reallocate water supplies away from the CRIT would be an unconstitutional taking of property, a violation of the decree in Arizona 1\ California, and a repudiation of the Winters doctrine. Therefore, any such alternative would, by definition be unreasonable and contrary to law. Simply put, we will oppose any alternative in the post-2026 NEPA process that seeks to involuntarily reallocate the CRIT's water rights with or without just compensation.	Colorado River Indian Tribes	Rebecca Loudbear

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20930	3	CRTRIBE - Cultural and Tribal Resources	E. Impacts to the CRIT by all alternatives must be folly analyzed. Post-2026 operations could have significant economic, cultural, environmental, religious, and recreational impacts on the CRIT. For example, the CRIT is one of the largest employers in La Paz County and there are many other jobs in the community that are directly linked to the CRIT's farming operations. Impacts on all of the CRIT's resources must be folly analyzed. F. Changes to the Multi-Species Conservation Program ("MSCP") must be fully disclosed. We anticipate there will be changes to the MSCP. As part of this analysis, the role of wildlife resources agencies on developing and permitting habitat restoration on tribal lands Page 2 of 4 must be disclosed and evaluated to permit full voluntaty pmiicipation by the CRIT on reservation lands in both Arizona and California.	Colorado River Indian Tribes	Rebecca Loudbear
20935	2	CRTRIBE - Cultural and Tribal Resources	...solar panels installed above water canals - the first effort in the entire United States [1]... is great news, and holds promise to solve multiple problems concurrently - solar panels above the canals reduce water loss via evaporation, produce locally-sourced electricity, and provide cutting edge science and technology to tribes, allowing accelerated development of their own lands in the way they see fit; a part of a mosaic that has the potential to heal historical wounds. More projects that encourage tribes to lead the spiritual transformation required in our relationship to the river - while allowing tribes to increase their sovereignty and self-determination - are foundational to the set of solutions that will allow the river and region to thrive in the upcoming decades.		Greg Bolla
20936	5	CRTRIBE - Cultural and Tribal Resources	Next, the EIS should address the existing imbalance between available water supplies and demands in the Colorado River Basin. The heavy demand of the Lower Basin, combined with the multidecadal drought and other effects of climate change that have negatively affected runoff, has drastically reduced storage in Lake Powell and Lake Mead. In the Upper Basin, irregular hydrology affects the availability of water supplies each year on a source-by-source basis. Despite voluntary actions involving significant financial investments to reduce demands over the last twenty (20) years- including crucial actions taken by the Community-the Lower Basin is now implementing weighty mandatory supply reductions. The EIS must identify necessary measures to balance the available water supplies and the uses that rely on the Colorado River. In doing so, the EIS must address this imbalance in a fair and equitable manner, considering all Colorado River water entitlement holders, particularly those to whom Reclamation owes a statutorily created trust responsibility, who have already contributed to drought mitigation through conservation. Numerous parties in the Lower Basin, including the Community, have partnered with Reclamation in the past to conserve hundreds of thousands of acre-feet of Colorado River water to protect Lake Mead. The Community itself has already contributed over 730,000 acre-feet of its Colorado River entitlement to improve elevation levels at Lake Mead, resulting in over ten (10) feet of additional elevation. Due to the supply imbalance and the United States' overreliance on at-risk water supplies like Central Arizona Project ("CAP") water, particularly Non-Indian Agricultural Priority CAP water, to address Indian Tribes water rights claims to senior water rights (e.g., many of the Community's claims were for time immemorial rights), many federal trust resources established through water settlements are at risk. The EIS must acknowledge this reality and that the United States will not be able to meet its Congressionally mandated obligations to settling Tribes like the Community unless the United States develops programs for augmentation of Colorado River and Lower Basin supplies for these Tribes and/or develops programs to find replacement water of any reduced water supplies held in trust by the United States on behalf of Tribes under Congressionally approved water settlements. 5 [5 The EIS should also anticipate the need to request from Congress the resources necessary to establish meaningful long-term voluntary system conservation programs in the Basin, as well as additional infrastructure and water augmentation funding.]	Gila River Indian Community	Stephen Lewis
20936	12	CRTRIBE - Cultural and Tribal Resources	While Reclamation should consider the ways in which Basin Tribes differ from other water users and the ways in which Basin Tribes differ from each other, Reclamation should not imbue certain Basin Tribes with more protection than others. Reclamation has a statutory trust responsibility to Tribes, like the Community, that have accepted statutory trust entitlements to Colorado River water delivered through CAP. This responsibility requires a high degree of care and protection, and which creates a trust claim for the affected Tribe in a manner different than others with contractual entitlements to Colorado River water.9 Moreover, these Tribal trust entitlements to Colorado River water through CAP are no less important than other Basin Tribes' rights to divert directly from the Colorado River. Reclamation has a money-mandating duty to consider and protect the Community's statutory entitlement to Colorado River water held in trust by the United States.10 At every step, Reclamation must consider and appropriately account for its trust responsibilities, especially protecting statutorily protected Tribal trust resources. As part of its trust responsibility, Reclamation must consider whether any reductions in Colorado River deliveries to a Tribe with a statutory entitlement to such water is likely to be permanent or nearly permanent, thereby necessitating the need to find replacement water for such lost entitlement.	Gila River Indian Community	Stephen Lewis
20938	11	CRTRIBE - Cultural and Tribal Resources	Utah is committed to engaging with sovereign Tribes located within the State during this NEPA process through appropriate sovereign-to-sovereign discussions and existing frameworks, including the Upper Division States-Tribes Dialogue. Utah will not support Post- 2026 operations that prevent any Tribe with lands in the Colorado River system in Utah from developing water rights settled under federal law and decreed under state law. Nevertheless, we recognize that the determination of unresolved Tribal water rights should be addressed through a process that is distinct from the development of the Post-2026 EIS.	Colorado River Authority of Utah	Betsy Coleman

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20945	3	CRTRIBE - Cultural and Tribal Resources	7. Acknowledge that Colorado River Basin Tribes have water rights that they are entitled to use.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20947	7	CRTRIBE - Cultural and Tribal Resources	An additional component should include assessing the feasibility of maintaining lower water levels in Lake Powell in order to create a more stable environment for management of resources above Glen Canyon Dam as well as to preserve the areas of Glen Canyon that have begun to emerge at low reservoir levels.	American Whitewater	Kestrel Kunz
20947	8	CRTRIBE - Cultural and Tribal Resources	d. Tribal water rights and Indigenous Traditional Ecological Knowledge need to be prioritized in all management decisions. The 2007 Guidelines do not mention tribes nor their water rights in either the purpose or element sections, despite the fact that tribes have been disenfranchised from their "wet" water rights for decades. Tribes have some of the most senior water rights on the Colorado River, yet they have been left out of management decisions since those water rights were established and often lack infrastructure and means to use their water. Any proposed water allocations and reductions in post-2026 operations need to fully analyze impacts to both developed and undeveloped tribal water rights. Many of these tribes and other indigenous communities in the Colorado River Basin have spent millenia living in symbiosis with the Colorado River despite droughts, floods, and other extreme environmental conditions. Their wealth of experience passed down through generations should be sought out and prioritized in the development of NEPA alternatives. The use of Indigenous Traditional Ecological Knowledge should be used to inform federal decision making as directed by White House Memorandum dated November 15, 2021, Indigenous Traditional Ecological Knowledge and Federal Decision Making.3 At least one element should be added to the 2007 guidelines that addresses meeting tribal water needs and incorporating Traditional Ecological Knowledge into the management regime of the Colorado River.	American Whitewater	Kestrel Kunz
20963	15	CRTRIBE - Cultural and Tribal Resources	[...] ii. Securing reliable access to clean water for all Tribal members and other Colorado River Basin residents. This includes developing water infrastructure that allows for the delivery of water to Tribal members.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20970	3	CRTRIBE - Cultural and Tribal Resources	And secondly, every effort should be made to: raise Tribal priorities during future negotiations, protect Tribal water rights, and invest in sustainable Tribal water infrastructure;		Jeanne Evenden
20981	5	CRTRIBE - Cultural and Tribal Resources	There is a critical need for infrastructure to allow tribes to fully and efficiently use their water resources. As part of the post-2026 process, or as part of a parallel process, the Nation proposes the establishment of a robust infrastructure funding source aimed at ensuring equitable access to water for tribes. This could include supporting the construction of pipelines, canals, and reservoirs, as well as implementing modernization measures and advanced water management technologies. Investing in modem, efficient water infrastructure not only enhances water supply reliability but also supports economic development, safeguards ecosystems, and strengthens the resilience of tribal communities. As such, investment in infrastructure is an essential component of any effort to preserve, protect, and facilitate access to tribal water.	Jicarilla Apache Nation	Edward Velarde
20989	2	CRTRIBE - Cultural and Tribal Resources	True equity is important in this conversation about the Post- 2026 Operations of Mead and Powell. Tribes to this day still live in the most impoverished conditions without adequate drinking water. Our White Mesa community in Utah only has a groundwater source that has been contaminated by uranium for many years and there is no surface water source to the community. We all are not on a level playing field because tribes do not have the political power.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20989	3	CRTRIBE - Cultural and Tribal Resources	Large cities with the most per capita use need to reduce their consumption and practice good stewardship of the land. Conservation programs need to be better managed in the Lower Basin. As it stands now, the Lower Basin is realizing money from water, when in a portion of that water is unused, undeveloped tribal water from the Upper Basin.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20989	8	CRTRIBE - Cultural and Tribal Resources	Mechanism for Tribes to Consume Water Not Included in the Hydrology Forecast The Post- 2026 guidelines are intended to address future operations of the reservoirs, so they need to include the consumption of Tribal water rights that are not currently being consumed or scheduled to be consumed. The Ute Mountain Ute Tribe has settled their water rights in Colorado and are vigorously planning to put that water to use. The UCRC Depletion Schedule includes the full use of those water rights, as determined in the 2018 Tribal Water Study. It is our understanding that those demands will be represented in the Post-2026 guideline analysis. However, the Ute Mountain Ute Tribe is currently pursuing water right settlements in New Mexico and Utah and is actively having discussions with potential lessees of its water and funding sources that could help install the infrastructure necessary to put that water to use. It would help if there was a mechanism that can be developed to allow the Tribe to consume additional water, yet not interfere with the river operations envisioned in the Post- 2026 guidelines as the water rights are settled and put to beneficial use. If this mechanism is not implemented, then the UMUT will face numerous obstacles to consumption of their water that they would not otherwise face.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart

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20989	9	CRTRIBE - Cultural and Tribal Resources	Compensation for Unused Water As stated above, Tribes like the Ute Mountain Ute Tribe are actively pursuing development of their unused water rights and such Tribe will continue to do so because water is important to their way of life and for economic development. Unfortunately, although progress is being made to identify the quantities of water that will be included in the yet unsettled New Mexico and Utah water rights claims, much of the Tribe's quantified rights remain unusable because the Tribe has been unable to negotiate its Repayment Contract with the Bureau of Reclamation for Lake Nighthorse water. More than 16,000 AF of depletions that are part of the Tribe's Federal Settlement bypass the Lake every year. The Tribe's frustrations in not being able to finalize a Repayment Contract is heightened not only by the fact that it has near-future uses for the water, but by the fact that the 16,000 AF is being used somewhere downstream and the Tribe is neither compensated for the water nor aware of the beneficiary. Although no Tribe would willingly delay development of its water when the development serves its people, in order to ensure such development will not occur in the short term and potentially disrupt river operations and planning and to ensure a good faith acknowledgement of the contribution unused Tribal water is making to the Colorado River system, Tribes must be compensated for unused water and compensated to refrain from developing their water. The amount of compensation must include losses associated with ceasing development, such as costs of lost opportunities and prospective interested parties.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20989	10	CRTRIBE - Cultural and Tribal Resources	Compensation for Used Water As with the discussion above, some Tribes, like the Ute Mountain Ute Tribe, are actively consuming large quantities of water that could be useful for managing reservoir levels. If these Tribes were to forego use, then the Tribes would lose important revenues derived from utilizing the water and the community's health is at risk. In order to capture large quantities of water that could improve river and reservoir operations, Tribes who are willing to participate should be allowed to have their water by-pass their systems, unconsumed, and receive compensation for any economic loss that could have been experienced from utilizing the water, costs of restarting the water systems once the water is again being consumed, and lost opportunities that could have occurred during the period of abatement.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20989	12	CRTRIBE - Cultural and Tribal Resources	Tracking Tribal Water in the River System Similar to above, in order to ensure that there is a clear understanding of the contribution quantified Tribal water makes to the Colorado River System, it is important to recognize as accurately as possible the source of Tribal water, its uses and depletions, the amounts that return to the system or are unconsumed, and the ultimate point of consumption and use of the water. This knowledge will help all water users and managers to best manage Tribal water and to understand the various ramifications of its use, non-use, and availability.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
21064	1	CRTRIBE - Cultural and Tribal Resources	1. Please, from the bottom of my heart, prioritize Tribal tribal water rights and infrastructure.		Bridget Dorsey
21081	4	CRTRIBE - Cultural and Tribal Resources	Given that the at least 30 unique Tribal Nations in the Basin that collectively hold rights to around 25% of the river, it is imperative that BoR and the Colorado River Basin states engage with Tribes consistently and incorporate their feedback into the new guidelines. Furthermore, installing infrastructure to ensure all Tribal nations have clean running water should be a priority for the federal government.	Dolores River Boating Advocates	Rica Fulton
21094	6	CRTRIBE - Cultural and Tribal Resources	In addition, as trustee to the Tribe, Reclamation has an obligation to ensure that the Post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead do not have a detrimental impact on Southern Ute's water rights or the future development of its water rights. Southern Ute urges Reclamation to ensure that the Post-2026 Guidelines are implemented in a manner consistent with Southern Ute's water rights and Reclamation's trust obligation to Southern Ute.	Southern Ute Indian Tribe	Melvin Baker
21094	10	CRTRIBE - Cultural and Tribal Resources	RECOGNIZE THE ROLE OF QUANTIFIED TRIBAL WATER THAT IS CURRENTLY UNDEVELOPED AND BEING USED BY DOWNSTREAM WATER USERS
As mentioned in the Introduction, the Tribe has a water settlement in place. Tribes negotiate water settlements to provide enough water for a permanent homeland. This includes water for future use, which means that many tribes may not be using their full quantity of water rights. The Tribe has not fully developed its water. However, the Tribe does have the right to develop its water in the future and we intend to do so. We need our water for the same reasons that non-tribal communities need it for, such as maintaining our clean drinking water supply, increasing access to clean drinking water for tribal members, and supporting our economic development for future prosperity. We should have flexibility to use our water in the way that works best for our tribe. While we are deciding on the best way to develop our water, that undeveloped quantity of water is flowing downstream. The United States, the Seven Basin States and downstream water users have not accounted for the tribal water that is currently undeveloped and is flowing downstream. A reliance has been built upon our water. We would like the U.S. to commit to developing a system that recognizes the value of the Basin Tribes' water contributions through its undeveloped water. We also request that the U.S. develop a plan to compensate Basin Tribes to forbear future water development for a certain number of years. This would provide Tribes that choose to participate in such a program with much needed funds for water infrastructure. Such a program would also allow the U.S. to ensure that tribal water flowing downstream could benefit the system during this ongoing drought.	Southern Ute Indian Tribe	Melvin Baker

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21094	13	CRTRIBE - Cultural and Tribal Resources	NO DEVELOPMENT CAPS There have been suggestions from various entities or academia that the Colorado River Basin should be closed to new uses or that development caps should be imposed on the Upper Basin. Because tribes have not had the opportunity to fully develop their settled or adjudicated water rights, the Tribe strongly disagrees with these suggestions. This is a direct attack on tribal sovereignty. There are many tribes that need to provide clean piped drinking water to their tribal members; to develop agriculture to provide food for their tribal members; to develop their economies to provide jobs to their tribal members; and to use for many other purposes. Until tribes can benefit from their fully developed water resources in a manner that is equal to the rest of the Basin communities, the United States should not consider any suggestions for development caps or closure on new water uses for tribes within the	Southern Ute Indian Tribe	Melvin Baker
21097	1	CRTRIBE - Cultural and Tribal Resources	Accordingly, the Bureau of Reclamation's consideration of Post-2026 operational strategies must take into consideration the Unites States' trust responsibility to Tribes and seek to implement management solutions on the Colorado River that will protect deliveries of Colorado River water supplies to the Tribes, including the Yavapai Apache Nation. Our request is also consistent with the Eiden Administration's commitment to Tribes.	Yavapai-Apache Nation	Tanya Lewis
21097	2	CRTRIBE - Cultural and Tribal Resources	And where Colorado River water deliveries to Tribes may be reduced, assistance should be directly provided to Tribes to replace those water supplies through other means, particularly in cases where the reduction to a Colorado River water supply threatens Tribal public health, will result in damage to a Tribal economy, or would impair or impede the ability of a Tribe to reach a water rights settlement.	Yavapai-Apache Nation	Tanya Lewis
21104	1	CRTRIBE - Cultural and Tribal Resources	1. Raise Tribal priorities during re-negotiation, protect Tribal water rights, and invest in sustainable Tribal water infrastructure		Lily Bosworth
21124	11	CRTRIBE - Cultural and Tribal Resources	Reclamation must consider tribal interests in the Post-2026 Guidelines. An appropriate balance of water supplies and uses cannot ignore either adjudicated or unadjudicated Tribal water rights. Only Tribal leaders and spokespersons can appropriately convey their interests and desires for the Post-2026 Guidelines, and we do not purport to speak for any Tribe. We suggest, however, that impacts on all Tribal water rights, including those not yet quantified and those not yet put to use, must clearly be considered in the examination of any proposed Post-2026 Guidelines. The possible settlement or other quantification of currently unresolved Tribal water rights should be included in all models for proposed alternatives in Post-2026 Guidelines so that it is clear to decision makers the implications for all basin water users when those legal and moral entitlements are met.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21151	1	CRTRIBE - Cultural and Tribal Resources	Consistent with the United States' trust obligations, the modeling approach developed by the United States for post-2026 operational strategies should account for undeveloped and unsettled Hopi water rights. The Hopi Tribe asserts rights to water from the Colorado River (including a share of Arizona's 50,000 acre foot Upper Basin Colorado River entitlement) and other off-reservation resources to fulfill the homeland purpose of the Reservation. According to 2020 provisional numbers, approximately 39,000 afy of Arizona's Upper Basin Colorado River entitlement is not currently being used. The modeling approach developed by the United States for post-2026 operational strategies should assume that this Upper Basin water will ultimately be used on the Hopi and Navajo Reservations in Arizona, and that pending use Hopi and Navajo will control the water for purposes of marketing and creation of intentionally created surplus. In addition, the Arizona Water Settlement Agreement among the United States of America, the State of Arizona, and the Central Arizona Water Conservation District dated August 16, 2004 sets aside 3,500 acre feet of uncontracted Arizona fourth priority mainstream Colorado River water for use in a future Navajo-Hopi Indian water rights settlement. As with the unused Arizona Upper Basin Colorado River water, the modeling approach developed by the United States for post-2026 operational strategies should assume that this Lower Basin water will ultimately be used on the Hopi and Navajo Reservations in Arizona, and that pending use Hopi and Navajo will control the water for purposes of marketing and creation of intentionally created surplus. The unused tribal water has value in the system. The United States should account for the unsettled federal reserved water rights, including the Hopi Tribe's federal reserved water rights.	Hopi Tribe	Timothy Nuvangyaoma
21151	2	CRTRIBE - Cultural and Tribal Resources	The Hopi Tribe has numerous tribal trust assets, resources, and interests in the Colorado River Basin that may be affected by a change in operations. All alternatives must address any potential impacts to Hopi trust assets, resources, or interests. Potential impacts disclosed and analyzed must be direct and indirect.	Hopi Tribe	Timothy Nuvangyaoma
21151	4	CRTRIBE - Cultural and Tribal Resources	Water is LIFE to the people of Hopi. The Grand Canyon River corridor is a place of paramount sanctimony and sacredness. It is the place of emergence and where Hopi return when they pass on. It is the place where we made our covenant to be stewards of the land, including the land encompassing the Grand Canyon. Being stewards is the most important core value of Hopi. Involvement in managing this precious resource allows us to be stewards on behalf of our ancestral lands and allows us to fulfill our sacred covenant.	Hopi Tribe	Timothy Nuvangyaoma
21155	1	CRTRIBE - Cultural and Tribal Resources	1. Allow Indigenous people and Tribes within the basin to access and utilize their water rights now and in perpetuity.		Dylan Mori
21158	1	CRTRIBE - Cultural and Tribal Resources	1st- Restore water rights to the Navajo Nation.		Kyle Aldridge

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21159	1	CRTRIBE - Cultural and Tribal Resources	One final thought that I should include, as it relates to native plant management, is that priority must be put on the nations indigenous to the region. Sovereignty over food and water for them can be beneficial to the whole, as they have the most experience with the region, from its biogeochemical cycles to its native flora, which are all incredibly interconnected.		Jack Dotzler
21163	3	CRTRIBE - Cultural and Tribal Resources	1. Acknowledge the possibility of Tribes within the basin utilizing the entirety of the water rights they are entitled to, regard ss of -urrent onpulation or development on tribally owned land. Any plan moving forwal 11 ea is to goal tee the ability for all federally recognized tribes within the basin to settle with the states for their water rights and to build the infrastructure in place to access them.		Madeline Cronin
21164	2	CRTRIBE - Cultural and Tribal Resources	I also think we need to prioritize tribal rights to water and indigenous knowledge when it comes to water conservation.		Mike Schinis
21167	1	CRTRIBE - Cultural and Tribal Resources	1. Acknowledge the possibility of Tribes within the basin utilizing the entirety of the water rights they are entitled to, regardless of current population or development on tribally owned land. Any plan moving forward needs to guarantee the ability for all federally recognized tribes within the basin to settle with the states for their water rights and to build the infrastructure in place to access them.		Teal Lehto
21169	1	CRTRIBE - Cultural and Tribal Resources	The Reservation is located adjacent to the rim of the Grand Canyon where the Redwall-Muav Aquifer discharges its groundwater at springs located along the rim of the Grand Canyon and along the other canyon walls within the Reservation. The Redwall-Muav Aquifer is a regional aquifer and the primary groundwater source for the Tribe's water. Recharge to Redwall-Muav Aquifer occurs upgradient at San Francisco Peaks and Mogollon Rim, as well as from upgradient underflow and infiltration from surrounding groundwater basins. The Tribe is one of the most downgradient users of the Redwall-Muav Aquifer and consequently is also one ofthe last users of Redwall-Muav Aquifer groundwater. As a result, the Tribe will be one of the users affected the most from increased groundwater withdrawals. The DEIS must acknowledge and analyze this potential impact.	Havasupai Tribe	Thomas Siyuja
21169	9	CRTRIBE - Cultural and Tribal Resources	1. As Reclamation is developing alternatives, we wish to remind you that any action by the United States as a trustee of the Havasupai Tribe must protect the unquantified Federal Reserved Water Rights and Water Resources of the Havasupai Tribe. 2. The Tribe since 1997 has been objecting to any major groundwater development in the Plateau. The lack of Colorado River surface water will result in groundwater development in the Plateau and thus will have adverse effects on the springs, water resources, and spectacular falls of the Havasupai Tribe, which are a national treasure.	Havasupai Tribe	Thomas Siyuja
21278	1	CRTRIBE - Cultural and Tribal Resources	Indigenous communities deserve priority in water allocation. They should receive their full allotments as guaranteed by treaty rights.		Bob Dorsett
17202	14	CUMU - Cumulative Effects	The scope of the SEIS must analyze and consider the cumulative effects on the System's hydropower production, including but not limited to: Basin Fund impacts, impacts to WAPA's contractual obligations to deliver federal hydropower, financial and societal impacts to firm electric service customers (which include 53 tribes), and impacts to transmission grid operations, which are essential to ensure viability of the Colorado River System.	CREDA Colorado River Energy Distributers Association	Leslie James
17241	28	CUMU - Cumulative Effects	Other resource impact analyses should include (but not be limited to): - Cumulative impacts.	National Audubon Society	Jennifer Pitt
20341	17	CUMU - Cumulative Effects	Changes to operations of the Colorado River portend far reaching cumulative effects. Therefore, Reclamation needs to analyze reasonably foreseeable cumulative effects resulting from the proposed action and alternatives, and that analysis should remain consistent across the proposed action and all alternatives. The CEQ NEPA regulations explain that cumulative effects result from the incremental effects of the proposed action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non- Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. Consequently, the cumulative effects analysis should include, at a minimum, reasonably foreseeable effects for downstream and off-River water bodies and users, including the Salton Sea, and existing water conservation obligations that were not analyzed for the 2007 Interim Guidelines.	Imperial Irrigation District	Shields, Tina L
20489	23	CUMU - Cumulative Effects	Causal and Cumulative Effects - Application of the post-2026 Guidelines will likely have reverberating impacts throughout the Basin. The NEPA analysis will have to acknowledge and assess the causal and cumulative impact of the proposed post-2026 actions on the full breadth of resources within the Basin. This includes the resources in addition to Lake Powell, Lake Mead, and the Colorado River mainstem that may have to adjust because of significant changes in water availability.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20608	6	CUMU - Cumulative Effects	Analyze alternatives for cumulative impacts to all of the above.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20899	30	CUMU - Cumulative Effects	16. Assess and evaluate the cumulative impacts of increasing aridity upon habitat for endangered species and water availability.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20952	20	CUMU - Cumulative Effects	Cumulative Effects on Communities with EJ Concerns Executive Order 14096 clarifies that federal agencies should carry out environmental reviews in a manner that includes the cumulative effects of the proposed action on communities with environmental justice concerns. The NEPA definition of cumulative impact is one "... which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR SS1508.1(g)(3)). Although all communities are affected by, and vulnerable to, uncontrolled water shortages, it is important to evaluate prior actions and decisions that have resulted in disproportionate burdens. EPA recommends detailing all past, present, and future actions that have or will contribute to significant cumulative effects on the communities with EJ concerns, discussed in the context of historical burdens or inequities and acknowledging previous reductions in water supplies.24	Environmental Protection Agency Region IX	Robin Truitt
20952	30	CUMU - Cumulative Effects	Analyze the direct, indirect (secondary), and cumulative impacts to the aquatic and other resource characteristics of the project area, including impacts to water quality and water quantity; stream channel morphology; riparian function; fish and invertebrate assemblages; threatened, endangered and/or sensitive species and their habitat; and other resources within the geographic scope of analysis. Additionally, we recommend that the impact analysis consider the potential for non-linear responses, where incremental impacts of the proposed project may result in non-incremental changes in environmental conditions. In the Draft EIS, include the following analyses or descriptions of potential project effects. * Analyze the direct, indirect, and cumulative impacts to all aquatic resources including, but not limited to wetlands including fens, streams, rivers, vernal pools within the geographic scope of potential impacts, including impacts to wetlands from changes in hydrology. Include in the analysis the indirect impacts to wetlands from loss of hydrology from water diversions and transfers. * Assess impacts associated with reservoir fluctuations and periodic inundation with quantification of lost aquatic and riparian habitat areas. * Provide detailed hydrologic analysis of existing stream conditions using representative datasets to enable an adequate assessment of the project's potential geomorphic and biological impacts. At a minimum, include wet, average, and dry year analyses at a daily time-step wherever possible. Consider potential influences of temperature and precipitation trends on future hydrology. * Analyze impacts to flow regime and stream morphology, with an emphasis on the implications of these changes on sediment transport, channel complexity, channel maintenance, aquatic habitat availability and life cycle requirements. * Review various water importation schemes, including transporting water from Sea of Cortez, Pacific Ocean, and reuse activities in Tijuana (all proposed for Salton Sea restoration in the absence of Colorado River allocations), and analyze the effects on the lower and upper Basin states.	Environmental Protection Agency Region IX	Robin Truitt

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20952	34	CUMU - Cumulative Effects	CUMULATIVE AND INDIRECT IMPACTS The cumulative impacts analysis should identify how resources, ecosystems, and communities in the project have already been, or would be, affected by past, present, or future activities in the project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. Trends data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components. For the cumulative impacts assessment, we recommend focusing on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed project before mitigation. For this project, conduct a thorough assessment of the cumulative impacts to aquatic, biological, and tribal resources. The EPA recommends that the Draft EIS identify which resources are analyzed, which ones are not, and why. NEPA requires the Draft EIS consider the following for each resource analyzed: * Identify the current condition of the resource as a measure of past impacts. * Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. * Identify all on-going, planned, and reasonably foreseeable projects in the study areas, which may contribute to cumulative impacts. * Identify the future condition of the resource based on an analysis of impacts from reasonably foreseeable projects or actions added to existing conditions and current trends. * Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource and provide a specific measure for the projected impact from the proposed alternatives. * When cumulative impacts are identified for a resource, propose mitigation. * Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. Identify opportunities to avoid and minimize impacts through changes to project elements or mitigation, including working with other entities that may have authority or responsibility for these measures. Although some mitigation measures may be outside the jurisdiction of Reclamation, describing them in the EIS would serve to alert other agencies or officials who can implement these extra measures (Council on Environmental Quality's 40 Questions #19(b)).	Environmental Protection Agency Region IX	Robin Truitt
20952	36	CUMU - Cumulative Effects	After establishing a consistent approach for measuring and reporting reservoir evaporation Basin-wide, assess the potential for increased evaporative losses and sedimentation and the combined effect of each on long-term reservoir levels and future energy production. Under each climate scenario presented in the Draft EIS, clearly identify how the alternative policies and operations identified have accounted for these losses using the most accurate science-based atmospheric and reservoir models available. Using these assumptions in hydrologic and environmental modeling (e.g., Colorado River Mid-term Modeling System), assess potential impacts from changes in the amount and timing of streamflow and identify how such changes could affect aquatic species and their habitats, riparian and wetland areas and functions, and climate-influenced water quality parameters like water temperature.	Environmental Protection Agency Region IX	Robin Truitt
Form 7	-	DATA - Data Sources	Use the best available science and plan for there being less water in the river today and less water in the future due to a warming, drying climate.	Western Resource Advocates	
19	2	DATA - Data Sources	just want to encourage the bureau to really work with the USGS, and to really use all of the important research that the USGS has done, particularly in the Grand Canyon regarding the recreation, economy, sediment, transport, and a number of other factors. but yes, I'll leave it at that, and I'm looking forward to submitting written comments.		Kestrel Kunz
9585	1	DATA - Data Sources	Planning for its future in the time of severe drought must incorporate the best scientific knowledge.		Gloria McClintock
12848	9	DATA - Data Sources	Kuhn and Fleck also point out that, though some scientific work has been conducted to estimate reservoir evaporation on Lakes Mojave, Mead, and Powell, more work is needed to provide consistent reliable data on "actual monthly and annual surface evaporation numbers for all of its major system reservoirs." In addition, Upper Basin estimates of river losses in transit equal the net losses above what might have been lost without the water supply system - including surface versus alluvial groundwater flows and evapotranspiration from river vegetation. These numbers are highly speculative. Perhaps studies on re-emergent rivers around Lake Powell might shed some light on this matter.		Lisa Buchanan
16904	7	DATA - Data Sources	A cost/benefit analyses of the generation of hydropower should compare the cost of reducing water deliveries, the damage done to and degradation of the river corridor's ecosystem by continuing the fluctuation of flows.	Grand Canyon Private Boaters' Association	john vrymoed
17241	30	DATA - Data Sources	Use sound science - Reclamation's decision process must be rooted in the best available science and reliable data, both regarding the range of future conditions in consideration of climate change impacts, as well as regarding the impacts of changes in river management.	National Audubon Society	Jennifer Pitt
20341	2	DATA - Data Sources	(2) use the best available science to provide the most appropriate data and advanced methods for forecasting hydrological conditions;	Imperial Irrigation District	Shields, Tina L

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20341	11	DATA - Data Sources	Reclamation should also consider the role of Colorado River tributary flows to meet state consumptive uses and agency entitlements, using the data and analysis included in the Consumptive Uses and Losses Reports required pursuant to the Colorado River Basin Project Act of 1968. Lower Basin and Mexico reporting, while current through 2022 in the annual Colorado River Accounting and Water Use Report: Arizona, California and Nevada, does not include tributary consumptive uses and system losses in the Lower Basin which were a key feature of Consumptive Uses and Losses Reports until 2005. Reclamation's last basin wide Consumptive Uses and Losses Report covered the period 2001-2005, and for periods 2006-2010, 2011-2015, and 2016-2020 only addressed the Upper Basin. Reclamation should resume its reporting of Consumptive Uses and Losses Reports for the entire Colorado River Basin consistent with the standing 1968 Congressional directive to do so and Reclamation's practice for 35 years.	Imperial Irrigation District	Shields, Tina L
20481	10	DATA - Data Sources	It should also incorporate the best available science, incorporating a broad but plausible range of hydrology to address the potential impacts of climate change and to establish guidelines for healthy management of the Colorado River System. Such a robust analysis will be necessary to withstand legal scrutiny.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	29	DATA - Data Sources	iii. Relying on realistic and actual hydrology trends: Integration of realistic and actual hydrology trends (recent drought trends, temperature adjusted hydrologies, reliable demands, actual storage conditions, and no assumption of "miracle water" arriving at Lee Ferry) into the operational and strategic decision-making considerations.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20624	1	DATA - Data Sources	The whole math was built on basically poor water data. So use science and truth to come up with real numbers.		Steve Munsell
20700	53	DATA - Data Sources	IV. RELEVANT STUDIES TO CONSIDER. The following studies may provide insights into the environmental review process for development of the post-2026 guidelines: * Bruckerhoff, L.A., Wheeler, K., Dibble, K.L, Mihalevich, B.A., Neilson, B.T., Wang, J., Yackulic, C., and Schmidt, J.C. 2022. Water Storage Decisions and Consumptive Use May Constrain Ecosystem Management under Severe Sustained Drought, Journal of the American Water Resource Association 58 (5): 654-72. https://doi.org/10.1111/1752- 1688.13020 * Connor, Michael. June 1994. Extracting the Monkey Wrench from Glen Canyon Dam: The Grande Canyon Protection Act - An Attempt at Balance. 15 Pub. Land L. Rev. 135. https://scholarworks.umt.edu/cgi/viewcontent.cgi?article=1313&context=plrlr * Fleck, John and Kuhn, Eric, An Historical Perspective on the Accounting for Evaporation and System Losses in the Lower Colorado River Basin (June 1, 2023). Science Be Dammed Working Paper #4 (June 2023), Available at SSRN: https://ssrn.com/abstract=4466530 or http://dx.doi.org/10.2139/ssrn.4466530 (Fleck and Kuhn 2023) * Kuhn, E., & Jacobs, K. L. (2022). Science and apportionment: Alternative futures for the Colorado River system. In J. A. Robison (Ed.), Cornerstone at the confluence: Navigating the Colorado River's Compact's next century (pp. 45-69). The University of Arizona Press. https://uapress.arizona.edu/book/cornerstone-at-the-confluence * Miller, O. L., Miller, M. P., Longley, P.C., Alder, J. R., Bearup, L. A., Pruitt, T., et al. (2021). How will baseflow respond to climate change in the Upper Colorado River Basin? Geophysical Research Letters, 48, e2021GL095085. https://doi.org/10.1029/2021GL095085 * Udall, B., and J. Overpeck (2017). The twenty-first century Colorado River hot drought and implications for the future. Water Resources Research, 53, 2402-2418, doi:10.1002/2016WR019638. https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1002/2016WR019638 * Wang, J., and Schmidt, J.C. 2020. Stream flow and Losses of the Colorado River in the Southern Colorado Plateau. The Future of the Colorado River Project, Quinney College of Natural Resources, Utah State University, White Paper No. 5. https://qcnr.usu.edu/coloradoriver/files/news/White-Paper-5.pdf * Wang, J., Udall, B., Kuhn, E., Wheeler, K., and Schmidt, J.C. (2021). Evaluating the Accuracy of Reclamation's 24-month Study Lake Powell Projections. Utah State University Center for Colorado River Studies, White Paper No. 7. https://qcnr.usu.edu//coloradoriver/files/news/White-Paper-7.pdf * Wheeler, K., Kuhn, E., Bruckerhoff, L., Udall, B., Wang, J., Gilbert, L., Goeking, S., Kasprak, A., Mihalevich, B., Neilson, B., Salehabadi, H., & Schmidt, J. C. (2021). Alternative management paradigms for the future of the Colorado and Green Rivers. Utah State University Center for Colorado River Studies, White Paper No. 6. https://qcnr.usu.edu/coloradoriver/files/CCRS_White_Paper_6.pdf * Wheeler, K., Udall, B., Wang, J., Kuhn, E., Salehabadi, H., & Schmidt, J. C. (2022). What will it take to stabilize the Colorado River? Science, 377(6804), 373-375. https://www.science.org/stoken/author-tokens/ST-631/full	Grand Canyon Trust	Jen Pelz
20817	12	DATA - Data Sources	The Post-2026 Operations must incorporate the best available science and account for an appropriately wide range of hydrologic conditions, from the very dry to the very wet.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft

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20899	38	DATA - Data Sources	**See links in actual attachment** NEW SCIENCE AND RESEARCH THAT MUST BE CONSIDERED We have compiled recent science and research relevant to the analysis needed in the DEIS. The list below and the attached documents supplement the other research we provided in earlier comments. 2023 - Aridification of Colorado River Basin's snowpack regions has driven water losses despite ameliorating effects of vegetation. Bass. Authors find that the CRB has 10% less water due to warming since the 1880s. 2023 - The Colorado River water crisis: Its origin and the future. Schmidt. Based on 21st century average run-off, a 13%-20% decline in basin-wide use would allow for stabilization and some reservoir storage recovery. 2023 - An historical perspective on the accounting for evaporation and system losses in the Lower Colorado River Basin. Kuhn. Water management of the Lower Colorado River has long sidestepped the questions of how to account for and assess the impact of reservoir evaporation and system losses. 2023 - A survey of the Bureau of Reclamations Decree Accounting Reports in the Lower Colorado River Basin. McCoy for ASCE. As climate change continues to constrain Colorado River water supply, detailed accounting may help reveal areas for potential efficiencies or demonstrate where the greatest levels of savings have been reached while ensuring that environmental and social benefits are preserved. 2022 - Causes of Missing Snowmelt Following Drought. Lapides for AGU. Depleted moisture storage reduced in 2021 forecasts from 60% to 20% at 15 minimally disturbed basins and from 18% to 2% at 6 water supply basins in the Sierra Nevada. 2022 - What will it take to stabilize the Colorado River? Wheeler. Current policies are inadequate to stabilize the Colorado River, but vigorous consumptive use strategies can stabilize the system. 2022 - An Assessment of Potential Severe Droughts in the ColoradoRiver Basin. Salehabadi. & xlsx data sheets. Modeling scenarios indicate considerable periods when Lake Powell falls below its hydropower penstocks, indicating a need to rethink management during these critical conditions. 2022 - Characterizing drought behavior in the Colorado River Basin using unsupervised machine learning. Talsma et al. We show that areas of the Upper CRB could experience a large reduction in available water for evapotranspiration. 2022 - Rapid Intensification of Emerging Southwestern North American megadrought in 2020 - 2021. Williams. Exceptional drought severity in 2021, ~19% of which is attributable to anthropogenic climate trends, 2000-2021 was the driest 22-yr period since at least 800 A.D. 2021 - Concurrent Changes in Extreme Hydroclimate Events in the Colorado River Basin. Bennett. Our results indicate that concurrent extreme hydroclimate events are projected to increase in the future and intensify within critical regions of the Colorado River basin. 2021 - Colorado Water: Climate Change and Adaptation. Climate documents compiled by Brad Udall and Jonathan Overpeck and useful for the administrative record. 2020 - Large Contribution From Anthropogenic Warming to Emerging North American Megadrought. Williams. Anthropogenic trends in temperature, relative humidity, and precipitation estimated from 31 climate models account for 47% (model interquartiles of 35 to 105%) of the 2000-2018 drought severity, 2023 - The Colorado River water crisis: Its origin and the future. Schmidt. The authors note actual reductions in use would be necessary to stabilize the current system and recovery is unlikely even if there are some wet years.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	40	DATA - Data Sources	The following three papers were written by the original committee members of the National Research Council in 1983, which require the attention of the writers of this Post-2026 EIS. The committee members back then included Roger R. Revelle, Paul Waggoner and Timothy P. Barnett. Since these gentlemen are no longer living, we suggest the EIS writers reach out to Daniel Cayan and David Pierce at The Scripps Institute in La Jolla, California. Many of the suggestions in these documents (below) resemble the goals and objectives that our found in the Notice of Intent for this EIS. A. National Research Council 1983. Changing Climate: Report of the Carbon Dioxide Assessment Committee. Washington, DC: The National Academies Press. https://doi.org/10.17226/18714. B. Effects of a Carbon Dioxide-Induced Climatic Change on Water Supplies in the Western United States (Chapter 7) by Roger R. Revelle and Paul E. Waggoner, 1983. http://www.riversimulator.org/Resources/ClimateDocs/ EffectsOfACarboInducedClimaticChangeOnWaterSuppliesInTheWesternUSARev elle1983.pdf C. Sustainable water deliveries from the Colorado River in a changing climate. Tim P. Barnett. Proceedings of the National Academy of Sciences, 2009. http:// www.riversimulator.org/Resources/ClimateDocs/PierceBarnett2009.pdf	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20947	12	DATA - Data Sources	In the Draft Supplemental Environmental Impact Statement (DSEIS) published in April 2023, the Bureau made wildly incorrect statements about river recreation, claiming that because flows were not anticipated to be below 5,000 cfs in the Grand Canyon that recreation would only have minor changes in use value and economic activity.4 However, river recreation in the Grand Canyon is more nuanced than a singular flow minimum. This is well documented in a study completed by Shelby, et al. (1992), that characterized minimum acceptable flows as 10,000 cfs, optimal flows of 20,000 - 25,000 cfs, and a maximum acceptable flow of 45,000 cfs.5 The statement in the DSEIS regarding the 5,000 cfs minimum is not backed up with evidence or given context and the findings from studies referenced above show that the aggregate minimum acceptable flow is twice that at 10,000 cfs. The USGS has also conducted multiple studies (Neher et al., 2017; Neher et al., 2019) assessing the willingness to pay of whitewater boaters in the Grand Canyon. Both studies found that whitewater boaters have a much lower willingness to pay when flows are at 5,000 cfs compared to three other higher flow scenarios assessed.6 The existing data that is based in science and is peer- reviewed, demonstrates that 5,000 cfs is not the only flow threshold that is needed to describe the river recreation opportunities that are affected by operations at Glen Canyon Dam. In addition to studies that have assessed flow needs for river recreation in the Grand Canyon, American Whitewater has conducted numerous flow-dependent recreation studies on the Colorado River and its tributaries in the Upper Basin. Stafford et al. (2016) extensively quantifies the flows that support river recreation opportunities in Cataract Canyon upstream from Glen Canyon, identifying both acceptable and optimal flow ranges and quantifying how often these flows occur across varying hydrological conditions (i.e., boatable day).7 Similar studies have been completed on river segments in the Upper Basin that are downstream from federal water projects, including on the Green, Gunnison, and Dolores Rivers. American Whitewater can provide electronic or hard copies of any of the above studies.	American Whitewater	Kestrel Kunz
21302	32	DATA - Data Sources	The availability and quality of data related to recent and current water use and demands varies widely within the Basin States and even within individual states. Moreover, climate change is affecting the water cycle and requiring re-evaluation of previous calculations such as crop evaporation. The water accounting for the Basin should include, at a minimum: Data sets for current and future demand that map closely to recent use and actual trends in water demand, including deployment of indirect measurements (e.g., satellite-based evapotranspiration measurement) where direct measurement is infeasible to better evaluate current use and changes in use over time. Efforts to improve the resolution of available flow data at a larger number of points in the Basin. Consideration of ongoing changes in crop types and irrigation methods in the evaluation of demand trends. Consideration of the impacts of temperature increases on future agricultural, industrial, and municipal demands. Better measurement of ecosystem uses of water and changes in response to drought and other stressors, including as a means of evaluating future environmental risks that may be associated with changing hydrological conditions.	City of Phoenix	Cynthia Campbell
651	1	DECI - Decision Process	All 7 states must be involved in this new agreement,		Steve Davis
654	9	DECI - Decision Process	We need a modified governance structure: A Lower Colorado River Basin Commission, with broad representation and strong federal guidance and technical participation. The current Â“systemÂ” of deals struck in airport lounges, conference calls and CRWUA hallways is about as far from transparent as one can get. The current ad hoc system just seems to be a way to continue business as usual and to avoid open meetings laws.	University of Arizona	Flessa, Karl W - (kflessa)
10042	1	DECI - Decision Process	Native American tribes who depend on this water system should be at the table when decisions are made. Seems to me the white man has done most of the damage and exploitation so maybe we need better stewards of this critical resource.		Mark Webster
17241	5	DECI - Decision Process	7. We will need to bring all expertise and interests to bear to meet the challenges we face going forward. Reclamation's NEPA process must be transparent and inclusive to ensure the outcomes are truly adaptive for all stakeholders.	National Audubon Society	Jennifer Pitt
17241	10	DECI - Decision Process	Be transparent - Reclamation's decision process must provide public access to options under consideration, evaluation criteria, and decisions at every step along the way. The changes in Colorado River hydrology are so large, with such far-reaching consequences for all water uses and potentially for other river basins, that the historic practice of back-room decision-making must be replaced with clear and thorough information-sharing throughout the decision process. For example, Reclamation could host monthly webinars discussing the status of negotiations, emerging reservoir and river management ideas, and updates regarding impacts analysis, and follow these webinars with opportunities for public comment. If the public is informed about these and other relevant issues on a regular cadence, Reclamation will have the opportunity to hear public input on a regular basis, rather than waiting for the infrequent, major milestones of the draft and final Environmental Impact Statements.	National Audubon Society	Jennifer Pitt

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20385	1	DECI - Decision Process	During the planning process to develop the 2007 Interim Guidelines, agricultural stakeholders were not included in a substantiative way. This was largely rectified in the development of the Lower Basin Drought Contingency Plan (LDCP). Arizona extended this stakeholder engagement by establishing the Arizona Reconsultation Committee, which has been proactive in preparing for discussion regarding post-2026 operations. Although Arizona farmers have repeatedly proven their willingness to be part of the solution for the entire system, predominantly at the sacrifice of food and fiber production, high-priority "on-river," agricultural users have been sidelined in these latest efforts. The priority system was respected during the development of the LDCP, which is why nearly half of central Arizona agriculture, accounting for nearly 25% of Arizona's agricultural production, has been followed. It should be without question that this priority system be respected in Post-2026 planning through a proper balance of mitigation and voluntary system conservation with the flexibility to plan for both short- and long-term river conditions, whether in drought or surplus. BOR has an opportunity to lead in its role as water manager with a strong analysis of the importance of agricultural production and its inclusion in any planning discussions.	Arizona Farm Bureau Federation	Ana Kennedy Otto
20417	2	DECI - Decision Process	or solicit adequate participation from basin stakeholders,	Western Resource Advocates	Bart Miller
20417	3	DECI - Decision Process	5. Decision-making forums should be meaningfully inclusive and enable input from a broad range of impacted people, parties, and stakeholders.	Western Resource Advocates	Bart Miller
20417	10	DECI - Decision Process	To truly bring the system back into balance, we must establish a more resilient and proactive system of governance that fully respects and meets the needs of all sovereigns, states, and sectors, including the environmental needs of the river and its tributaries throughout the Basin.	Western Resource Advocates	Bart Miller
20417	30	DECI - Decision Process	These are important issues, and conservation groups should be included in the process as they have much to contribute to a comprehensive, holistic approach to managing the vital resources of the Colorado River Basin to meet short- term needs and ensure long-term sustainability. We look forward to working with Reclamation and all other interests in the Colorado River Basin as the post-2026 Interim Guideline revision process moves ahead.	Western Resource Advocates	Bart Miller
20431	7	DECI - Decision Process	SRP supports Reclamation's outreach to all interested members of the public to provide comments on the scoping process. SRP believes it is important to hear from diverse water users to ensure that the next operational guidelines are implemented in a manner that takes into account the interests of all stakeholders. Incorporating such input affords parties an opportunity to manage their risk more effectively and help mitigate the risk of legal challenges from groups that have not been heard during the process.	Salt River Project	Leslie Meyers
20438	3	DECI - Decision Process	We also want to thank the Bureau for recognizing the importance of active and meaningful involvement by all sovereigns - including the thirty Colorado River Basin Tribal Nations and Mexico - in developing and implementing river management policy from the outset of the development of the Post-2026 Colorado River operational strategies. The Basin's Tribal Nations have recognized rights to use water rights to approximately twenty-five percent of Colorado River water (under senior or high priority, reserved rights), and many of these Tribal Nations are in the process of quantifying additional rights to Colorado River water. Given this volume of Tribal water, it is imperative that Tribal Nations be involved in crafting workable solutions with the federal government and the states and it is time to correct the historical wrong of Tribal exclusion. Indeed, we will need to bring all expertise and interests to bear to meet the challenges we face going forward.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	14	DECI - Decision Process	2. Develop a transparent and robust process for meaningfully engaging with Upper Basin Colorado River stakeholders to fully consider and inform operational and management decisions based on the contemporary diversity of needs, interests, priorities, historical use patterns, and the realities of drought and climate change;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20471	3	DECI - Decision Process	More generally, the process for determining the post-2026 plan must involve all stakeholders, including interests in the Upper Basin, the Department of State and Mexico, the Tribes, and major water users throughout the Basin.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20480	5	DECI - Decision Process	The unprecedented challenges we face require greater inclusivity and collaboration to achieve sustainable solutions. SNWA, CAWCD and Metropolitan understand that the success of future operations of the Colorado River system depends on working with water users and others invested in the outcomes of effective Post-2026 operations.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20480	8	DECI - Decision Process	Engagement with other stakeholders, including NGOs, interested in the Colorado River is also important to success of this process.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	1	DECI - Decision Process	In particular, the past decades show that collaboration among the Secretary, the Basin States, Mexico, the Tribes, water users and NGOs can result in better management of the System and avoid the protracted water supply uncertainty and other risks associated with litigation.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	2	DECI - Decision Process	Engagement of the Lower Division States in the development of the Post-2026 EIS will be essential to ensure the effectiveness of the new guidelines. The Lower Division States are committed to working with Reclamation throughout the National Environmental Policy Act (NEPA) process and anticipate developing a Basin States alternative for consideration and evaluation for Post-2026 Operations, as we did in the NEPA process for the 2007 Interim Guidelines.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	26	DECI - Decision Process	V. Engagement As we have stated before, the unprecedented challenges we face require greater inclusivity and collaboration to achieve lasting solutions. The Lower Division States understand that the success of future operations of the Colorado River system depends on working with water users and others invested in the outcomes of effective Post-2026 operations.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	29	DECI - Decision Process	The Lower Division States also understand the importance of engagement with other stakeholders, including NGOs, interested in the Colorado River. Collaboration and cooperation among all water users and stakeholders will be essential to achieve success, particularly if Congressional authorization is required.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke

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20482	1	DECI - Decision Process	The Basin States have a unique interest in the management of the Colorado River. Reclamation's engagement with the Basin States will therefore be essential to ensure the effectiveness of post-2026 operations. As parties and beneficiaries to the interstate compacts, treaties, laws, and supreme court decrees that govern the Colorado River, the Basin States have significant interests in protecting the water supplies of the forty million people who rely on the Colorado River. Recognizing the unique status of the Basin States, the Secretary of the Interior ("Secretary") must consult with the Governors' Representatives from each Basin State and collaborate on the development of alternatives for the Post-2026 EIS at Lake Powell and Lake Mead. The Secretary's options for post- 2026 operations will be significantly limited without the Basin States' participation. The Basin States are committed to working with Reclamation through the NEPA process to develop the new guidelines for the Post-2026 EIS. In addition, the Basin States anticipate working together to develop an alternative for consideration and evaluation, as the States did for the NEPA process for the 2007 Guidelines.	State of Wyoming; State of Nevada; State of California; State of Arizona; State of New Mexico; State of Colorado; State of Utah	Brandon Gebhart; John Entsminger; JB Hamby; Thomas Buschatzke; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20482	2	DECI - Decision Process	The unprecedented challenges we face require greater collaboration to achieve sustainable solutions. We understand that the success of future operations of Lake Powell and Lake Mead depends on working closely with Colorado River Basin Tribes, water users, non-governmental organizations, and other stakeholders.	State of Wyoming; State of Nevada; State of California; State of Arizona; State of New Mexico; State of Colorado; State of Utah	Brandon Gebhart; John Entsminger; JB Hamby; Thomas Buschatzke; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20489	9	DECI - Decision Process	6. The post-2026 Guidelines development process must be transparent and meaningfully inclusive. The credibility and longevity of effective operations and strategies depend on the extent to which leadership at the federal, state, and tribal levels can exercise their respective roles as public water rights holders, conveners, guardians of a transparent and inclusive process, science and Indigenous Knowledge providers and administrators of effective programs to integrate perspectives from the full range of affected stakeholders into future operational and management strategies.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	46	DECI - Decision Process	Robust Process Considerations: Leadership by federal, state, and Tribal governments is critical to an effective management framework. But these entities cannot operate in a vacuum to balance the needs and interests of the entire Basin community. The credibility and longevity of effective operations and strategies also depend on the extent that each of these governments can exercise their respective roles as public water rights holders, conveners, guardians of a transparent and inclusive process, science and Indigenous Knowledge providers, and administrators of effective programs to integrate perspectives from the full range of affected stakeholders into future resource management and decision-making processes. We are encouraged by the Bureau's initial efforts to build new pathways for acknowledging Tribal Nations, maintaining strong relationships with Mexico, and expanding participation to discuss and explore a broad range of operational strategies. (See Scoping Notice). They are the important steps to ensuring the rights and interests of the Colorado River community are sufficiently considered and included in the new Colorado River management strategies.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	49	DECI - Decision Process	iii. Afford opportunities to work directly with state, Tribal and federal agencies on the NEPA efforts for stakeholders, including the undersigned conservation groups, with a demonstrated commitment and willingness to address the Basin's water challenges. In previous Colorado River NEPA processes, conservation groups who were committed to the process introduced an alternative that was incorporated into the overall analysis and parts of which were subsequently integrated into the Preferred Alternative. We look forward to working with the Bureau and other stakeholders again to develop one or more alternatives that help explore the full range of reasonable strategies and allow the Colorado River community to pinpoint useful and robust operational and decision-making frameworks for the Basin going forward. This process may call for more than singling out a consensus driven (Preferred) alternative at the draft stage of the Environmental Impact Statement. Considering deep uncertainties in future Colorado River hydrology, and the need for multiple strategic considerations, it may be advisable for the Bureau to work with and allow for engaged stakeholders to explore a broader range of creative and useful opportunities than might otherwise be conducted in other NEPA investigations, or than were conducted in developing the 2007 Interim Guidelines.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	12	DECI - Decision Process	The NPS notes the need for interagency coordination in developing operational strategies, given the effects throughout the system to a large number of government agencies, tribal nations, and stakeholders.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20490	15	DECI - Decision Process	We also encourage coordination with the many environmental organizations and academics that are strategizing and publishing on how the Post-2026 Colorado River system could be protected. We believe an inclusive approach from the start will lead to more creative solutions and a more optimal outcome.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	33	DECI - Decision Process	The NPS recommends Reclamation work closely with all DOI bureaus engaged with Colorado River resources and operations to optimize the range of alternatives to meet all legal mandates, regardless of bureau.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20608	11	DECI - Decision Process	Likewise, engage the GCDAMP, its GCMRC scientific expertise and resources, and engage the AMWG as a body, to provide recommendations to the Secretary of Interior for the EIS alternatives and impacts analysis.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20619	1	DECI - Decision Process	Tribes should be actively involved in the decision, their long term perspective is very valuable.		Paula Dean
20621	7	DECI - Decision Process	As non-consumptive users, our rights will not interfere with any of the other users of Colorado River water. For 60 years Lake Powell has stood as the guardian and fulfilled its role as a management tool for adequate Basin State water allocation. It is now time to rethink those original policies and include other stakeholders in future policy considerations. For this reason, any analysis of our plan that distinguishes it as a "recreation alternative" will only be complete if the analysis also recognizes the environmental benefits of our plan along with our plan's ability to meet the needs and demands of the law and other stakeholders.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20700	3	DECI - Decision Process	We appreciate the efforts being made at the federal and state levels to be more inclusive and equitable in this process; however, we also recognize that to remedy a century of historical exclusion and injustice for tribes, the environment, and likely others there is a difficult unlearning process that takes time, serious intention, and much awareness and course correction along the way.	Grand Canyon Trust	Jen Pelz
20700	11	DECI - Decision Process	Reclamation should engage the 30 basin tribes to help craft such a purpose as these communities have lived in the basin and sustained the river since time immemorial.	Grand Canyon Trust	Jen Pelz
20700	41	DECI - Decision Process	It is not the responsibility of the Department of the Interior to resolve all the outstanding disputes among stakeholders in the Colorado River Basin. It is long past time that the basin states show leadership and reach agreement on longstanding issues that are at the foundation of the water crisis before us. These agreements should be the foundation of the balancing of supply and demand in the basin. Based on lessons from the past, these negotiations will need to include the 30 basin tribes, U.S., Mexico and include discussions with other interested parties; however, the states must be willing to make hard choices that benefits the system in the long run and reconcile miscalculations made in the past. It is because the states cannot reach an agreement that the Secretary of Interior is left in the role of trying to clean up the mess that has been created.	Grand Canyon Trust	Jen Pelz
20738	1	DECI - Decision Process	As to process, an essential starting point is ensuring the inclusion of Basin tribes in every step of the development and analysis of potential alternatives, the identification of a preferred alternative, and the implementation of the suite of actions that the Bureau of Reclamation (Reclamation) ultimately adopts through a Final EIS and Record of Decision (ROD). We are encouraged that you seem to have taken to heart the spirit of the comment we provided last year, that "[t]he most effective way we see to ensure appropriate tribal inclusion in the process of developing a post-2026 management framework is for the United States to serve as the convener of the forum in which the substantive negotiations over that framework are to take place:' The all-sovereigns meeting you convened in Phoenix on August 10 was a positive step in this direction, particularly your commitment there that this gathering was only a beginning, and that regular and continued engagement remains necessary as we move forward in charting our collective post-2026 future. We look forward to Reclamation's continued fulfillment of that commitment.	Quechan Indian Tribe	Jordan Joaquin
20947	11	DECI - Decision Process	and river recreation stakeholders must be meaningfully engaged in the process.	American Whitewater	Kestrel Kunz
20972	1	DECI - Decision Process	Stakeholders have not been represented equally in discussions over the use of Colorado River water. Some have been given a great deal of attention, while others have been left out entirely. This disparity is exacerbated by the fact that many of those that have been given full access to the process are the most junior users on the River while many of the most senior users have been excluded. The exclusion of senior users might otherwise be fine if their water uses were not at risk, but we know that is not the case - every water user was at risk of reduction under the Bureau's SEIS alternatives and will likely continue to be at risk in the EIS process. This disparity cannot be made worse. The process for determining the post-2026 operations of the River must involve all stakeholders, including interests in the Upper Basin, the Department of State and Mexico, the Tribes, and major water users throughout the Basin.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears

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20990	1	DECI - Decision Process	Bifurcation of the Post-2026 Operational Strategies and Guidelines Development DEIS and the near-term response actions and development of post-2026 operations SEIS processes will result in a flawed process and unsatisfactory results. It is fair to state that the above points are contained within the statements found on page 8 of the Pre-Scoping Summary Report, however, the emphasis being placed on an administrative process to supersede the 2007 Interim Guidelines1 is misguided in seeking to bifurcate post-2026 operational strategies and guidelines from what will be post-2026 Colorado River System accounting, water storage and distribution hierarchy, and water conservation operations. The clear statement of Reclamation's intention to do so is found in the paragraph beginning at the top of the left column of page 39456, the June 16, 2023, Federal Register notice makes the statement: With respect to the relationship between the ongoing SEIS process and the post-2026 process, the November 2022 Federal Register notice was clear that the SEIS: ''does not interfere with, supplant, or supersede that separate post-2026 guidelines development process. Rather, this SEIS will inform and complement the development of post-2026 guidelines.'' The SEIS is focused on limited sections of the 2007 Interim Guidelines to develop the operational tools necessary to address potential extreme drought conditions during the 2024 to 2026 timeframe. In contrast, the post-2026 process will address the subsequent timeframe and revisit all sections of the 2007 Interim Guidelines and other operating agreements that expire in 2026 (e.g., the DCP). The appropriate scope of post- 2026 operations will be determined after conclusion of the public scoping process. Indeed, the June 16, 2023, Federal Register notice, i.e., (the subject of this letter) further notes this shortcoming in the paragraph beginning at the bottom of the left column of page 39456, wherein the notice states: The June 2022 Federal Register notice for pre-scoping for post-2026 operations anticipated "that near-term response actions and development of post-2026 operations will need to proceed on parallel timelines. The SEIS and post-2026 processes are now underway and proceeding simultaneously as predicted. Every effort will be made to provide clear and timely information regarding the milestones for public engagement in the post-2026 process to minimize the stakeholder and public burden of tracking and engaging in both efforts." The notion expressed in these descriptions of overlain, multiple-ongoing NEPA actions proceeding on parallel timelines is not practical. This commenter believes the outlined process to be flawed. Reclamation cannot practicably separate considerations of the "near-term response actions and development of post-2026 operations" from the "river operational guidelines and strategies and modifications to the purpose and elements of the 2007 Interim Guidelines" and expect to derive a workable result. It was not possible to do this as the 2007 Interim Guidelines were developed, nor was it done with the 2019 Drought Contingency Plan efforts. It is true that the words written in the several Federal Register notices state Reclamation's intention to take this course of action; however, nowhere has an attempt been made to describe how this will be done, the bases for why pursuing this course is appropriate or necessary, and the administration and mechanics of simultaneous processes. Specifically, assumptions will have to be made as to the annual diversion demands below Hoover Dam for this effort without the benefit of the best available information. What are to be the basis for those assumptions and the reduction of those demands as time goes forward? Regarding Footnote 2, it is apparent that the information and analysis compiled through the two studies will NOT be integrated one into the other. Accordingly, we fully anticipate the results of both studies will be unsatisfactory. There will be inconsistencies identified and additional analyses desired due to overlooking conceptual solutions to complex problems; typically, complex problems require solutions that are both well planned and laid out in specific detail. The suggested approach does not allow for this outcome. Reclamation's April 2023 Near-term Colorado River Operations Draft Supplemental Environmental Impact Statement included analyses that properly must be considered in this Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS. Cursory review of the April 2023 DSEIS reveals that the "bright line" between the two efforts that Reclamation is attempting to distinguish is not real. As but one example, Section 2.8, Action Alternative 2 (page 2-14) sets forth significant analysis of what can only be described as operational strategies and post-2026 guidelines. Accordingly, the thesis that these efforts are currently, and can be appropriately kept, separate, is highly suspect. See also Table 2-11 to support this statement. The key themes presented in the January 2023 Pre-Scoping Summary Report, as quoted above at the top of page 2 above, support our contention that the development of post-2026 operational guidelines and strategies needs to be done as part of the Near-term Colorado River Operations Draft Supplemental Environmental Impact Statement effort. Given the significant financial resources (tens of millions of dollars from the BIL and the IRA), Reclamation needs to broaden the scope of actions proposed to be taken in support of Near-Term Colorado River Operations. A comprehensive list of suggestions was submitted by this firm in response to the Friday June 24, 2022, the Department of Interior, Bureau of Reclamation issued a notice in the Federal Register,3 requesting input on the development of post-2026 Colorado River reservoir operational strategies for Lake Powell and Lake Mead under historically low reservoir conditions. A copy of that submittal is attached for convenient reference.	Southwest Hydrology & Hydraulics, LLC	Douglas Blatchford

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21094	8	DECI - Decision Process	II. TRIBAL INCLUSION Tribes have historically been left out of the conversations on the management of the Colorado River system, including Lake Powell and Lake Mead. The Tribal Water Study found that the ten (10) member tribes of the Colorado River Ten Tribes Partnership (of which the Southern Ute Indian Tribe is a member) hold rights to approximately 2.8 million acre-feet of water per year from the Colorado River and its tributaries. This is a significant amount of water. When the water rights of the additional twenty Colorado River Basin Tribes are added to that amount, it is clear that a large portion of the Colorado River Basin water rights are held by tribes. However, tribes are not merely water users or members of the public; tribes are sovereign nations. As a sovereign in the Basin, the Tribe does not want to be updated on the negotiations between the States and the Federal team after decisions are made; the Tribe wants to be at the table during discussions and negotiations. The Tribe must be involved in discussions in order to protect our water rights and share its expertise while crafting a solution to this long-term challenge we all face. It is time to create a structure that involves tribes in the negotiating and decision-making for actions in the Colorado River Basin. The Tribe thanks Reclamation for its recent efforts in providing information to the tribes through the Tribal Information Exchange.	Southern Ute Indian Tribe	Melvin Baker
21151	7	DECI - Decision Process	The Hopi Tribe wishes for continued fair and equal consultation among other stakeholders in this process.	Hopi Tribe	Timothy Nuvangyaoma
17241	14	EJ - Environmental Justice	President Biden's 2023 Executive Order on Environmental Justice states: "To fulfill our Nation's promises of justice, liberty, and equality, every person must have clean air to breathe; clean water to drink; safe and healthy foods to eat; and an environment that is healthy, sustainable, climate-resilient, and free from harmful pollution and chemical exposure" (emphasis added). Reclamation historically used enormous federal financial subsidies to promote development of the Colorado River and spur economic growth in the Western United States. Today, it is broadly acknowledged that this development also created significant negative outcomes for the region's Tribes as well as birds and other wildlife. As the agency now pivots to Colorado River management adaptive to climate change, the agency should adopt a purpose and need for management that improves the reliability of supplies for everyone and everything that depends on access to clean water, with emphasis on correcting past inequities.	National Audubon Society	Jennifer Pitt
17241	40	EJ - Environmental Justice	In addition, Reclamation must consider management impacts on vulnerable communities.	National Audubon Society	Jennifer Pitt
20328	1	EJ - Environmental Justice	* Disadvantaged communities have been sidelined from the decision making process and that needs to end now. If this administration truly wants to make Justice40 a reality, Reclamation must use its operations authority and funds authorized by the Inflation Reduction Act to benefit disadvantaged communities.	Comite Civico Del Valle	Max Gomberg
20341	7	EJ - Environmental Justice	Not all Native American tribes have the same water rights or priority to the Colorado River, and these critical distinctions need to be reflected in the EIS, including in the environmental justice analysis, to ensure accurate, informed conclusions regarding adverse effects which may disproportionately affect communities with environmental justice concerns. Similarly, the Imperial Valley, with no alternative supplies to the Colorado River, and a large environmental justice community, requires an environmental justice analysis distinct from Indian Trust Assets and many other areas of use within California, Arizona, or Nevada, which have alternative water supplies.	Imperial Irrigation District	Shields, Tina L
20438	28	EJ - Environmental Justice	4. Consideration of continuing and growing needs for sustainable energy supplies, especially for Tribal, rural, and otherwise disadvantaged communities;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20471	6	EJ - Environmental Justice	NEPA also requires the Bureau to analyze the environmental justice impacts of its alternatives. The DSEIS had significant gaps in this regard. In particular, the Bureau's post-2026 analysis should analyze the impacts on rural communities of reduced federal hydropower generation and any rate increases that result from higher hydropower prices or substitute power sources. Hoover, Parker-Davis, and Colorado River Storage Project hydropower ratepayers contribute significant revenue to the Lower Colorado River Basin Development Fund and Upper Colorado River Basin Fund to cover important operational and non-power Bureau programs and costs. This includes aid to irrigation, environmental, and endangered species recovery programs, the Colorado River Salinity Control Program, and others, as well as operations and maintenance costs necessary to support the multiple benefits of Bureau dams and facilities. Although hydropower customers may be able to absorb these annual expenses in normal water years, continuing to require them to pay for these programs while confronting the massive additional power replacement expenses due to extreme drought conditions and difficult power market conditions creates a significant hardship. In its environmental justice analysis, the Bureau should examine the effects on designated environmental justice communities from decreased electric reliability and access to affordable electricity. The Bureau should also evaluate the impacts of reduced funding for the Basin Funds.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20952	2	EJ - Environmental Justice	* Provide an Environmental Justice analysis that identifies and involves communities with environmental justice concerns who are most likely to have their water supplies severely diminished or reduced to zero as tied to the current priority system, and a discussion of ways to avoid, minimize or mitigate adverse and disproportionate impacts.	Environmental Protection Agency Region IX	Robin Truitt
20952	18	EJ - Environmental Justice	ENVIRONMENTAL JUSTICE ANALYSIS The EPA recommends that the Draft EIS incorporate an environmental justice perspective into all facets of decision-making and strive to achieve water equity among all users through operations and funding consistent with Executive Order 14096 Revitalizing Our Nation's Commitment to Environmental Justice for All (2023). EO 14096 direct agencies to identify, analyze, and address actions related to any Federal regulation, policy, or practice that impairs the ability of communities with environmental justice concerns to achieve or maintain a healthy and sustainable environment. Further, it requires agencies to evaluate relevant legal authorities and, where available and appropriate, consider adopting or requiring measures to avoid, minimize, or mitigate disproportionate and adverse human health and environmental effects of Federal activities on communities with environmental justice concerns, to the maximum extent practicable. Identifying Communities with EJ concerns To comply with this Executive Order, a relatively refined understanding of potential adverse impacts on a community-by-community basis is needed to provide decision-makers with the level of detail necessary to make an informed choice between alternatives and determine whether mitigation is available. Depending on the scope of the Draft EIS, EPA is aware of the challenges presented by large, impacted areas to initially identify communities with EJ concerns. We strongly encourage the use of EJScreen15 when conducting EJ scoping efforts as the first step in highlighting locations that may be candidates for further analysis. Chapter 6, p. 6-115 begins the section on Flooded Lands and describes the methodology for calculating GHG emissions from flooded lands. 13https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030- greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean- energy-technologies. 14 The Western Interconnection region includes Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming. 15 Available at: https://ejscreen.epa.gov/mapper/; User Guide at https://ejscreen.epa.gov/mapper/help/ejscreen_help.pdf When assessing large geographic areas, the EPA recommends considering individual block groups within the project area, in addition to an area-wide assessment, in recognition of the inherent uncertainties with screening level data and instances when the presence of EJ populations may be diluted (in large project areas or rural locations). This can help narrow down the areas that may warrant further consideration, analysis, or outreach. While county level reports can provide meaningful baseline information upon which to compare small geographies, county level reports should not be used to determine the presence, or absence, of areas of potential EJ concern. The EJScreen tool combines demographic and environmental information that can help identify potential community vulnerabilities. EJScreen calculates EJ Indexes and displays data in color-coded maps and standardized reports (e.g., pollution sources, health disparities, climate change data). EJScreen uses two types of indexes: supplemental and standard. We strongly suggest using the standard EJ index, which includes people of color. The threshold map feature16 in EJScreen can be used to identify areas with one or more EJScreen indicator(s) above the 80th Percentile.17 The national (vs. state) index is most appropriate for this EJ analysis since project operations cross multiple state lines.18 For purposes of NEPA review, the EPA identified the 80th percentile filter as a starting point for identifying areas of potential concern in geographic areas showing one or more of the twelve EJ Indexes at or above the 80th percentile in the nation. The 80th percentile is not intended to designate an area as an "EJ community;" conversely, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present or that other relevant vulnerabilities do not exist. Nor should the tool's standard data report be considered a substitute for conducting a full EJ analysis - scoping efforts should consider other factors and sources of information such as local knowledge, health-based information or proximity and exposure to environmental hazards when reasonably available.19 A minority population does not need to meet a 50 percent standard if "the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis."20 The NEPA Committee of the Federal Interagency Working Group on Environmental Justice has noted that, in some cases, it may be appropriate to use a threshold for identifying low-income populations that exceeds the poverty level.21 When identifying communities	Environmental Protection Agency Region IX	Robin Truitt

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			that may have environmental justice concerns, it is important to avoid labeling or defining communities as "Environmental Justice Communities" unless that is how they define themselves. EPA suggests using the term "communities with EJ concerns," as there may be urban, rural, or tribal areas that may have communities with environmental justice concerns within their boundaries, but not be representative of the community as a whole. Meaningful Engagement Once communities with EJ concerns are identified, Section 3 of EO 14096 directs agencies to seek out and encourage the involvement of communities with EJ concerns that are potentially affected by federal 16 See basic information on threshold maps here: https://www.epa.gov/ejscreen/threshold-maps-ejscreen 17 For details on the 80th percentile, see: https://www.epa.gov/sites/default/files/2021-04/documents/ejscreen_technical_document.pdf 18 To download data for the EJScreen map data for threshold analysis, visit: https://www.epa.gov/ejscreen/download- ejscreen-data 19 https://www.epa.gov/ejscreen/how-interpret-ejscreen-data, updated 6/26/23. 20 Council on Environmental Quality. Environmental Justice: Guidance Under the National Environmental Policy Act. December 1997. Available at https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. 21 Federal Interagency Working Group on Environmental Justice & NEPA Committee. Promising Practices for EJ Methodologies in NEPA Reviews. March 2016. Available at: https://www.epa.gov/sites/production/files/2016- 08/documents/nepa_promising_practices_document_2016.pdf. activities and provide technical assistance tools and resources to assist in facilitating meaningful and informed public participation. Additionally, CEQ's EJ Guidance states "...agencies should elicit the views of the affected populations on measures to mitigate a disproportionately high and adverse human health or environmental effect...and should carefully consider community views in developing and implementing mitigation strategies. Any mitigation measures should reflect the needs and preferences of affected low-income populations, people of color, or Indian tribes to the extent practicable." This guidance suggests that a comprehensive public involvement plan be developed including an environmental justice component that identifies and engages with disproportionately, adversely affected communities. The Environmental Justice Interagency Working Group's Promising Practices for EJ Methodologies in NEPA Reviews"4 provides ways to both consider environmental justice concerns during environmental analyses and encourage effective participation by communities with environmental justice concerns. EPA recommends that Reclamation review the input received during pre-scoping efforts to identify any disparities in participation by these communities and flag for further outreach and involvement. Promising Practices suggests initiating meaningful engagement with communities early and often; providing potentially affected communities with an agency-designated point of contact; and convening project-specific community advisory committees, as appropriate. In the Draft EIS, summarize information describing what was done to inform these communities about the project and the potential impacts it would have on their communities, what input was received from the communities, and how that input was utilized in the decisions that were made regarding the project. EPA notes that the participation of low-income, people of color, and tribal populations may require adaptive or innovative approaches to overcome linguistic, institutional, cultural, economic, historical, or other potential barriers to effective participation in the decision-making processes of Federal agencies under customary NEPA procedures.22		
20952	19	EJ - Environmental Justice	Where alternatives may result in zero available project water for some water users, the EPA recommends that the Draft EIS present information on the relative availability, estimated costs, and affordability of alternative water sources for low-income communities or communities burdened by other EJ concerns as it is essential to making a reasoned choice among alternatives, minimizing, or mitigating adverse impacts, and protecting public health and safety. Following our recommendation to use block groups to identify communities with EJ concerns, describe in the Draft EIS the measures taken by Reclamation to identify and analyze: * which of the action alternatives could potentially result in substantial reductions or zero available water for these communities; * the associated impacts from zero water availability in these communities; * which disproportionately impacted communities have no water replacement sources or rely on deficient groundwater supplies;23 * the general, estimated costs for disproportionately impacted communities to utilize available alternative water sources; and * whether these communities could reasonably be expected to afford the estimated replacement costs. 22 CEQ's Environmental Justice Guidance Under the National Environmental Policy Act (1997) 23 See e.g., Arizona Department of Water Resources Technical Memorandum for Phoenix Active Management Areas - 100-Year Assured Water Supply Projection: https://infoshare.azwater.gov/docushare/dsweb/Get/Document-76432/2023_Technical_Memorandum_Phx_AMA_100_Yr_Projection.pdf Clearly identify potential mitigation measures to minimize impacts to communities with EJ concerns and provide monitoring and adaptive management plans to ensure that mitigation is effective.	Environmental Protection Agency Region IX	Robin Truitt
80	1	ENERGY - Energy	All the loss of electricity is #1 especially since everyone thinks electric vehicles are the future but where does that power come from?		Edward Kmetz
131	2	ENERGY - Energy	Lake Powell creates power for millions		Jen Swenson
174	2	ENERGY - Energy	We also use Lake Powell has a huge power source in our area. We need levels high to generate that power.		Brittany Hoyt
1647	1	ENERGY - Energy	I STRONGLY SUPPORT COVERING IRRIGATION CHANNELS TO LIMIT EVAPORATION, WITH SOLAR PANELS TO SUPPLY ELECTRICITY. THIS IS OUR HERITAGE. A HEALTHY, BALANCED ECOSYSTEM DEPENDS ON SMART WATER MANAGEMENT.		Diane Hilscher

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12848	7	ENERGY - Energy	V Additional Renewable Energy to Offset Lake Powell Production Additional renewable energy sources need to be developed to offset the loss of power production in Lake Powell - for instance, if Powell levels are limited to 3,550 feet or aridification reduces storage in Lake Powell to the point where full bypass or outlet structures need to be utilized. Given the proximity of the tribal nations to Lake Powell, placement of renewable energy sources on tribal lands AND administered by the tribes for their benefit make perfect sense.		Lisa Buchanan
16904	2	ENERGY - Energy	It should be made clear that the Western Area Power Administration's interest is to produce and maximize the economics of hydroelectric power and that this intent drives the Bureau's operation of the dam. Hence, alternatives listed in the "Framework Agreement Alternative and the Reservoir Operations Modification Alternatives" reduce water deliveries so that the generation of hydropower is maintained. These alternatives are based on an interpretation of the "intended design" that generation of hydropower supersedes the delivery water. Thus, if not modified, it is imperative that the SEIS for post 2026 operations publicly and clearly state that this is the case.	Grand Canyon Private Boaters' Association	john vrymoed
16904	3	ENERGY - Energy	Previously, the draft SEIS stated that alternatives for short term operation "....may consider potential effects on wildlife, threatened and endangered species habitat, recreation, water supplies (agricultural, municipal, environmental), water resources, air quality, cultural resources, hydropower resources, social and economic conditions, and other resources and uses." These aspects have been considered in the past and relegated to a lower value than the value attributed to hydropower. To wit, the Long Term Experimental Management Program (LTEMP) for the Operation of Glen Canyon Dam Draft EIS of December 2015. One of the EIS's primary objectives was to ".....Maintain or increase Glen Canyon Dam electric energy generation, load following capability, and ramp rate capability, ..." LTEMPS' preferred alternative maintained a daily fluctuation of flows even though it was found that eliminating these had the highest potential for building sandbars and retaining sand in the system and providing the greatest benefit to the aquatic ecology. Furthermore, the recreational benefit was found to be enhanced by eliminating these fluctuations. Despite all these benefits, the selected alternative continued the fluctuation of daily flow and thereby satisfy maintaining or increasing Glen Canyon Dam's electric energy generation. Post 2026 operations need to incorporate these findings in any future plan and reconsider the tradeoff of peaking flows at the cost of the river's aquatic ecology and recreational use.	Grand Canyon Private Boaters' Association	john vrymoed
17202	2	ENERGY - Energy	As Glen Canyon Dam is one of the two key facilities addressed in this process, it is important at the outset of this process to recognize the statutory authorities and mandates underpinning Dam operations. CRSPA Section 1 defines the purposes, which are (numbers added): In order to initiate the comprehensive 2 development of the water resources of the Upper Colorado River Basin, for the purposes, among others, of 1) regulating the flow of the Colorado River, 2) storing water for beneficial consumptive use, making it possible for the States of the Upper Basin to utilize, consistently with the provisions of the Colorado River Compact, the apportionments made to and among them in the Colorado River Compact and the Upper Colorado River Basin Compact, respectively, providing for the 3) reclamation of arid and semiarid land, 4) for the control of floods, and for the 5) generation of hydroelectric power, as an incident of the foregoing purposes. Note the use of the word INCIDENT. It is not INCIDENTAL. It is not secondary, lesser, subservient, nonexistent, or any other descriptor. It is RELATED TO the foregoing purposes. Section 620 of the Act also contains another reference to hydropower, by its authorization "to construct, operate and maintain....dams, reservoirs, powerplants, transmission facilities and appurtenant works." The protection and clarity about hydropower is not limited to these two references. Later in the Act, section 7 requires that the GCD hydropower plants "be operated in conjunction with other Federal powerplants, present and potential, so as to produce the greatest practicable amount of power and energy that can be sold at firm power and energy rates".	CREDA Colorado River Energy Distributers Association	Leslie James
17202	7	ENERGY - Energy	CREDA will continue to participate in parallel processes among Reclamation and WAPA to discuss how a long-term sustainable approach that rebalances the obligation and role of federal hydropower revenues in supporting federal priorities may lend itself to the post-2026 process. The burden of maintaining federally owned infrastructure facilities must be reconsidered to reflect conditions reflecting best available hydrologic and climatologic science. The Post-2026 scoping process should identify legislative and regulatory strategies to rebalance power obligations in a time when the hydropower contract deliveries are not reflective of the costs charged to power customers, many of whom are in the most impoverished areas of the country.	CREDA Colorado River Energy Distributers Association	Leslie James

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17202	11	ENERGY - Energy	The Post-2026 NOI recognizes historic drought and low runoff conditions since implementation of the 2007 Guidelines. Since that implementation in 2007, the West continues to experience significant changes directed at addressing climate change. As Lakes Mead and Powell decline, there is a risk of losing two major carbon-free generating resources in the West. The importance of these renewable and readily available generation resources was not fully assessed in the 2007 Guidelines FEIS. Loss or reduction of these resources can significantly impact public health and safety; on September 6, 2022, Glen Canyon Dam was again called on to provide emergency assistance to California during extreme heat conditions, to assist in preventing major electrical blackouts. "Hydropower is a strong contributor to grid resilience and reliability." Hydropower Value Study: Current Status and Future Opportunities | Department of Energy. Glen Canyon and Hoover Dams are "critical assets for ensuring grid reliability during extreme weather events." https://www.pnnl.gov/main/publications/external/technical_reports/PNNL-30554.pdf Reclamation has recognized that absent hydrologic improvement, it "may likely need to also prioritize implementation of near-term actions to stabilize the decline in reservoir storage and prevent system collapse." (emphasis added - June 24, 2022 FRN). Preventing system collapse extends beyond specific water releases or operational actions, it includes ensuring the infrastructure facilities of the system are operated and maintained in a manner to ensure the statutorily authorized purposes (including the generation of hydropower) are maintained.	CREDA Colorado River Energy Distributers Association	Leslie James
17202	12	ENERGY - Energy	The Post-2026 NOI recognizes at 39457 that the four original elements of the 2007 Guidelines "have remained intact", despite additional agreements and actions being undertaken. One such agreement also referenced as to be addressed in post-2026 is the Drought Contingency Plan (DCP). A critical element of the DCP that reinforces the overarching theme suggested above, as well as the widely expressed themes, is on Page 1, the Background and Objectives, and is very explicit as to the importance of hydropower: 3 "2. Maintain the ability to generate hydropower at Glen Canyon Dam so as to protect: a. Continued operation and maintenance of the CRSPA Initial Units and participating projects authorized under the 1956 Colorado River Storage Project Act, as amended ("CRSPA"); b. Continued implementation of environmental and other programs historically funded by CRSPA revenues that are beneficial to the Colorado River system; c. Continued electrical service to power customers including municipalities, cooperatives, irrigation districts, federal and state agencies and Native American Tribes, and the continued functioning of the western Interconnected Bulk Electric System that extends from Mexico to Canada and from California to Kansas and Nebraska; and d. Safety contingencies for nuclear power plant facilities within the Colorado River Basin. "	CREDA Colorado River Energy Distributers Association	Leslie James
17241	26	ENERGY - Energy	Other resource impact analyses should include (but not be limited to): - Hydropower;	National Audubon Society	Jennifer Pitt
20431	5	ENERGY - Energy	Consider hydropower impacts Although hydropower is "subservient" to the use of Colorado River water for domestic or agricultural purposes,10 that does not mean that it should not be taken into consideration as shortage guidelines are developed. Arizona and the West experienced record-breaking temperatures in Summer 2023, which pushed the SRP power system to reach new peak loads serval times throughout the month of July. As temperatures and populations both increase, energy demands are only projected to go up. Colorado River facilities can provide more than 4,200 megawatts of renewable, carbon-free energy to millions of people across the Basin. This energy resource will continue to grow in importance for the stability and sustainability of power generation supplies. Failing to account for impacts to hydropower generation resulting from any proposed equitably allocated reductions included in future operational guidelines could have significant repercussions for those who rely on it. Those implications exist for both direct power users, and for those who rely on the hydropower produced by the Colorado River facilities to effectuate power exchanges. Domestic and agricultural water users need a stable and functional grid. The Final Environmental Impact Statement for the 2007 Guidelines included an analysis relating to hydropower production.11 Reclamation should give at least that same weight to hydropower impacts during its consideration of the Post-2026 operational guidelines. Guidelines should consider impacts to environmental programs like the MSCP	Salt River Project	Leslie Meyers
20473	9	ENERGY - Energy	Protecting Hydropower to Ensure Energy Reliability Finally, protect hydropower to the extent possible given the existing drought. Despite receiving above average runoff this year, Lake Powell and Lake Mead are still below average. Continued conservation on the river has reduced water volume through the dams resulting in increased costs for hydropower customers. Hoover customers signed 50-year contracts in 2016, before DCP and other conservation programs were put in place. The same can be said for CRSP customers, many of whom renewed their contracts before major reductions in releases from Glen Canyon Dam occurred. In Arizona, most of the power from these dams provide cheaper input costs for farmers to provide affordable food for Americans. Since DCP, the cost for Arizona customers has increased significantly. For example, Boulder Canyon Project rates have increased 4.7%, while available energy has decreased by 10.6% (2019-2022). Similar stories can be told for Colorado River Storage Project (35.8% available energy decrease [2016-2022]) and Parker-Davis (48.7% composite rate increase [2016- 2022]). Federal hydropower contractors have experienced multiple impacts with higher rates, reduced energy, reduced surface water, shift to groundwater and higher replacement power costs.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20476	3	ENERGY - Energy	At Lake Powell, the Navajo Nation has energy, water, and economic concerns. Large projects like the Navajo Indian Irrigation Project and Navajo-Gallup Water Supply Project rely on the Colorado River Storage Project for power. The importance to hydropower to the Navajo Nation demands consideration of operational changes that will impact the Navajo people as firm electric service customers.	Navajo Nation	Buu Nygren

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20869	1	ENERGY - Energy	The APA supports and adopts the comments made by the Colorado River Energy Distributors Association, and the joint comments made by the Irrigation and Electric Districts Association of Arizona, Grand Canyon State Electric Cooperative Association, and the Arizona Municipal Power Users Association. Additionally, the APA strongly supports Commissioner Touton's testimony provided to Congress on April 26, 2023, where she stated "[r]eclamation's projects and programs serve as the water and power infrastructure backbone of the American West. For far too long, the impacts on hydropower resources have not been adequately considered when addressing the impacts of drought in the Colorado River basin. From where we stand today, hydropower plays a vital role in ensuring the continued reliability of the western electric grid and it should be treated as such.	Arizona Power Authority	Jordy Fuentes
20899	19	ENERGY - Energy	Bureau of Reclamation must analyze options for replacement power for decommissioning Glen Canyon Dam Replacement power can be found both through conservation and efficiency measures and through implementing renewable energy projects paired with electric storage. Such projects in the areas currently serviced by the Glen Canyon Dam hydropower could include, but are not limited to, creative solutions such as installing solar panels on the Central Arizona Project to reduce evaporation and generate new clean energy.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	9	ENERGY - Energy	Engineering limitations of Glen Canyon Dam When Reclamation designed Glen Canyon Dam, it prioritized two things: (1) water storage to allow the Upper Basin States to store their unused apportionment of Colorado River water while meeting their delivery requirements, and (2) hydropower generation29. The dam was not designed to run at the low reservoir levels we face in the era of aridification. The eight hydropower penstocks collect reservoir water at elevation 3,470 feet above sea level are the primary means of moving water downstream. Once the reservoir dips below minimum power pool, elevation 3,490 feet above sea level, the only way for the dam to release water is through the river outlet works located at elevation 3,374. The outlet works have a much more limited structural ability to release water, with diminishing capacity as the reservoir drops closer to them, a function of reduced head pressure30. The figure below, from Futures of the Colorado White Paper #1, breaks down the maximum release capacity of the outlet works, assuming they are run at full capacity. [see table in attachment] Table from White Paper #1 demonstrating limited release capacity of river outlet works	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20927	7	ENERGY - Energy	Any revised system operating guidelines must preserve the ability to generate hydropower at Glen Canyon Dam consistent with applicable law.	Front Range Water Council	Alan Salazar
20940	3	ENERGY - Energy	We must maintain minimum power generation levels of 3525 in Lake Powell and 1000 in Lake Mead to ensure that the power grid has a reliable base load. In surplus years like 2023 we must strive to not overuse a temporary abundance of water. I would suggest never using more than 20% per year of the volume in excess of the minimum power generation levels. This should provide us a comfortable buffer if we experience a series of very dry years.		Ken Brenner
20947	5	ENERGY - Energy	The elements of the 2007 Guidelines should incorporate the related federal effort to modify engineering at Glen Canyon Dam. A recent report by Utah Rivers Council, Glen Canyon Institute, and Great Basin Water Network highlighted that the archaic engineering of Glen Canyon Dam could not only curtail hydropower, but could limit or completely halt downstream water deliveries to the Lower Basin States.2 In addition to the inability to meet water delivery obligations, environmental and recreation resources downstream in Grand Canyon National Park would be severely impacted. Bureau of Reclamation's effort to look at engineered modifications for hydropower and water outlets at Glen Canyon Dam will directly impact the ability to fulfill the purposes and elements of the 2007 Guidelines. Regardless if they are separate NEPA processes, there needs to be a high level of coordination and ideally the outcomes of the dam modification effort can inform the final Post-2026 Operations of Glen Canyon and Lake Mead.	American Whitewater	Kestrel Kunz

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20962	2	ENERGY - Energy	Technical Analysis on the Importance of Hydropower to Grid Reliability The scope of Reclamation's analysis needs to consider the impact of proposed guidelines and operations on hydropower generation generally and more specifically on the reliability of the western electric grid. It is particularly important to study the impact of reduced releases from the dams during the dry summer months when electrical demand is high, and the grid is most vulnerable. States in the west are working aggressively toward increasing renewable generation with the goal of having generation portfolios in the range of fifty percent or more by 2030. The goals are laudable, but difficult to achieve since the dominant renewable energy in the southwestern United States is solar which has operational challenges during those periods when demand is high and solar production is unavailable. Efforts are being made to couple solar with batteries, but some operational challenges remain. These challenges have played out in the past and likely will continue to be of concern post 2026, especially with the expected growth in demand for energy as part of the electrification of the transportation sector. Thus, consistent with recommendations made during the pre-scoping period to assemble an integrated, interdisciplinary team to help prepare the EIS, Reclamation should also consider assembling such a team to evaluate the impact of reduced water releases from the dams on the reliability of the grid during periods of high demand. Such a team should include a broad range of industry experts including WAPA, reliability organizations, and grid operators. The studies should focus on resource adequacy and the need to preserve generation capacity which would help inform the need to establish a minimum protection level at both Lake Powell and Lake Mead.	State of Nevada Colorado River Commission	Eric Witkoski
20989	13	ENERGY - Energy	Energy Development In order to mitigate the impacts of reduced power production or the loss of power, Reclamation must shore up and develop alternative sources of power and ensure that power projects using water continue to receive the water they need, regardless of reservoir operations. Many projects use water in order to produce power but do not have the dependence on water levels for pressure, such as the types of solar and pump back storage projects being planned at the Ute Mountain Ute Tribe. The Bureau must assess the water needs for these projects, including projects yet to be developed but with a realistic possibility of implementation, and ensure that water management does not jeopardize or reduce the effective operations of the projects.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
21066	6	ENERGY - Energy	Here are some good reasons for keeping a sustainable water level in Lake Powell: * Prevent Powell's water level from dropping too low, threatening the turbines and power generation.		Tiffany Mapel
21124	13	ENERGY - Energy	Similarly, analytical support will be needed to evaluate the impacts of reservoir operations on hydropower generation and system-wide water resource operations. Preparation of this EIS cannot be merely delegated to a private contractor with the assumption that the contractor will have the capacity to analyze all relevant scientific and engineering issues.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21302	24	ENERGY - Energy	The scope of the EiS should include an up-to-date analysis of the significance of hydropower to the Western power grid, impacts to generation from reduced flows, and impacts to the financial resources that are provided by hydropower generation. Revenues from hydropower finance several activities throughout the Basin, including meeting operational costs for Reclamation facilities, operation of infrastructure critical to Indian water rights settlements, salinity control, and endangered fish programs. This analysis will be necessary to help stakeholders understand changes to hydropower operations and help plan for potential futures without or with limited hydropower. It can also help identify the funding needs that may need to be sought from other sources to sustain the programs dependent upon hydropower.	City of Phoenix	Cynthia Campbell
2	2	GEOSED - Sedimentation and Geology	I live 1 mile from the San Andreas Fault. Science tells you that by removing water which helps stabilize the sand and dirt in the ground, that we are all more in jeopardy of having a dry heave cracking and the big one will hit.		Judy Graham
20899	28	GEOSED - Sedimentation and Geology	13. Reassess the effect of sediment mobilization at Lake Powell on storage, recreation, wildlife habitat, water quality, water temperature and other such impacts related to Glen Canyon Dam operations.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20913	12	GEOSED - Sedimentation and Geology	In a scenario where the reservoir nears deadpool without subsequent engineering modifications to Glen Canyon Dam, its lifespan would dramatically decrease due to its storage volume being displaced with sediment. The Colorado River has the second largest natural sediment load of any large river in North America, moving an estimated 54-60 million metric tons of sediment per year into Lake Powell38. When the reservoir is full, this amount of sediment displaces a relatively small portion of the reservoir. But when the reservoir is low, that proportion of sediment displacement will more quickly diminish the reservoir's smaller storage volume as sediment moves closer to the dam. According to the findings of Schmidt et al. (2016), if the reservoir were to remain at levels between power pool and deadpool, sedimentation will eventually reach the dam and directly affect flow into the River Outlet Works39. Sediment has been accumulating in the upper reaches of the reservoir for nearly 60 years, totaling a loss of 6.8% reservoir storage capacity since 196340. As the reservoir and its volume of stored water has declined, the rate of siltation has increased relative to its overall size. [see attachment for graphic] Even without the depleted storage of Lake Powell, the dam was designed with an operational end date, exemplified by the estimated silt levels highlighted in the slide above. The slide shows that the original design of Glen Canyon Dam anticipated a silt level of ~3,344 ft by the year 2063. Currently, there is approximately 70 feet of silt behind the dam, which will continue to accumulate over time. As the reservoir has dropped, sediment has encroached farther downstream toward the dam42. The above graphic highlights the reality that Glen Canyon Dam will have to be modified eventually, or become clogged with sediment.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	30	GEOSED - Sedimentation and Geology	7. The need to for a sediment management plan in Glen and Grand Canyon With the combination of Lake Powell's retreat and the massive amounts of sediment accumulating in Glen Canyon every year, massive sediment deltas are emerging and consistently moving in Glen Canyon, and deserve careful consideration in operational strategies under the Post-2026 NEPA process. These deltas are moving down through the mainstem river canyons. In the coming 20-50 years these "mud glaciers"75 will greatly affect the viability of the reservoir's storage capacity. In areas where the reservoir once was, mitigation efforts need to be taken where the sediment is damaging resources. On the San Juan River, the original river channel has been displaced causing a waterfall at Paiute Farms, which will create challenges for future rafting recreation and ecological challenges. The lack of riverine ecosystem connectivity at the falls has impacts on native fish populations. The waterfall has blocked upstream sediment from the San Juan, impacting not just the newly flowing sections of river below Lake Powell's full pool level, but even causing river sediment to back up farther upstream76. A sediment management plan should include some monitoring of the Paiute Farms waterfall and how it is impacting resources above the 3,700 elevation level. Graphic showing sediment cross sections and waterfall formations on the San Juan River. Returning Rapids 2023 Field Binder. It's believed a similar waterfall may soon develop near Hite at the end of Narrow Canyon77. The emergence of such a waterfall would create a significant safety hazard and impact the recreation opportunities for private boaters and outfitters who utilize that section of river. If a reservoir-caused waterfall forms near the Hite area, Reclamation must assess the feasibility of dredging or directing the river back in its original channel. Any long term operation plans must include development of a comprehensive sediment plan in Glen Canyon. This plan should address issues related to waterway access (river or reservoir), resource impacts, and resource remediation above areas where the reservoir will likely not be anymore. Understanding the sediment dynamics will allow the National Park Service, the Bureau of Reclamation and the State of Utah to actively manage infrastructure and public safety programs within Glen Canyon National Recreation Area. The recently completed USGS sediment survey of Lake Powell should form one of the elements of this assessment.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20957	12	GEOSED - Sedimentation and Geology	Sediment in Grand Canyon is severely limited by Glen Canyon Dam upstream. The sediment limitation has not only caused degradation of habitats, cultural sites, and recreational beaches, but it has also cost millions for studies and attempted remediation. Previous implementation of the Interim Guidelines via equalization flows between the reservoirs in 2011 caused irreparable damage to Grand Canyon by scouring sediment from beaches and sandbars that will never be fully replaced. [see letter attachment for list of references] 8 Because the health of Grand Canyon depends upon proper dam management, unlike past guidelines, the new ones must be sensitive to resultant impacts on the river resource. Colorado River experts have been asking for more holistic dam operations for years now, after observing the degradation that the Interim Guidelines caused. The 2019 Colorado River Conversations Final Conference Report, compiled by the University of Arizona Center for Climate Adaptation Science and Solutions, recorded the need identified by participants to see the river as a system, and to protect Grand Canyon's precious sediment: "Participants noted that the future management of the system must consider the river as a whole, not as two individual basins or as a series of separate segments between dams that are operated to optimize particular objectives. Considering the river as a whole requires accounting for groundwater, tributaries, sediment, temperature, salinity, the Salton Sea, and the Delta - not just the volumes of surface water that can be diverted from the mainstem under different flow regimes. It also means empowering the full array of stakeholders and affected parties to engage in discussions about the River's future..."9 and "Sediment balance should be added into the management considerations. The fundamental dilemma for Grand Canyon is the stream water is out of balance with sediment supply... Equalization flows wipe out sand bars. There are ecological consequences of moving that much water all at once."10 The new post-2026 operations must address the river as a holistic system, and must protect Grand Canyon from further harm. Despite efforts to mimic flood flows, manage introduced species, and translocate native fish, the ecological integrity of the CRE in Grand Canyon continues to struggle.	Sierra Club Grand Canyon	Alicyn Gitlin
2437	2	HHS - Human Health and Safety	as well as humans who get their drinking water from it, depends on keeping tis river flowing.		Renate Pealer

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9735	2	HHS - Human Health and Safety	which in turn impacts human food sources now and in the future. A mass die-off would affect human economies and food safety.		Mary Hogan
10589	1	HHS - Human Health and Safety	And letâ€™s not forget the residents of Page, Arizona and the Navajo Indians residing on the adjacent reservation whose lives and livelihoods depend on dependable , reliable water availability.		Dennis Paradee
10671	1	HHS - Human Health and Safety	Without water from this endangered resource, countless lives will be severely impacted not only in the southwest but across the entire U.S. Each state (as well as the indigenous tribes in the region) drawing water from this river must cooperate in this endeavor for conservation measures to be successful.		Chester Kusek
11011	2	HHS - Human Health and Safety	but people as well. Communities that already struggle to access clean drinking water will be put at further risk if we donâ€™t change the status quo.		Nancy Jensen
16207	3	HHS - Human Health and Safety	and a major source of my potable water.		James Heidke
16727	6	HHS - Human Health and Safety	Public health and safety - a phrase used several times in the draft SEIS - should be a higher priority than routine dam operations. We encourage Reclamation to define "public health and safety" in the post-2026 guidelines, to minimize the likelihood of conflict over inconsistent state- or contractor-based definitions.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
20438	20	HHS - Human Health and Safety	3. Provide reliable access to clean drinking water and adequate sanitation for all Tribal Nations and Colorado River communities;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20480	3	HHS - Human Health and Safety	Recent experiences including declining reservoir inflow and historically low elevations of Lake Powell and Lake Mead in 2022 have made it clear that the Post-2026 Operational Guidelines need to include provisions that protect sufficient storage in Lake Mead and provide for water deliveries to meet public health, safety, and welfare needs if hydrologic conditions are so dry and reservoir conditions are so low that human health, safety and welfare needs would not be otherwise met by Colorado River deliveries.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20487	2	HHS - Human Health and Safety	The health crisis we are facing, especially in the areas around the Salton Sea, are being ignored. The Salton Sea relies on Colorado River water completely, and cutbacks in available river water will destroy the Salton Sea. This will make our health problems much worse!		chuck Parker
20489	34	HHS - Human Health and Safety	b. Access to clean water - Access to reliable, clean, and drinkable water is an essential human need. However, it is not ubiquitous in the Colorado River Basin, especially among tribal nations. Post-2026 strategies must operate in a manner to promote reliable access to clean drinking water and adequate sanitation for all Tribal members along with other Colorado River Basin residents.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20496	3	HHS - Human Health and Safety	When planning the future management of the Colorado River there are two realities that must be addressed first and foremost: ensuring that clean drinking water is available to all Americans and that the source of that water, and the landscapes that carry it, are protected and cared for. The Colorado River Basin is on a long-term trajectory to do neither.		Morgan Sjogren
20919	17	HHS - Human Health and Safety	Furthermore, water use determinations for the Colorado River Basin must take into consideration fundamental human health and safety and welfare needs.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20979	4	HHS - Human Health and Safety	We acknowledge that there are tough decisions to be made through this process. We understand that these decisions will adversely impact our organizations and water users. For this reason, we believe that precisely defining reservoir operations as early as possible will help us all to prepare for the challenging times ahead. Modified operating guidelines developed through this process must protect critical water related health and safety needs	Arizona Water Company; City of Buckeye; City of Surprise; EPCOR Inc. (EPCOR Water); Town of Marana; Town of Queen Creek; Water Utility of Greater Tonopah (Global Water Resources); City of Casa Grande; City of Maricopa; Pinal County; Town of Superior	Melinda Whittington; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Todd Pryor
21094	15	HHS - Human Health and Safety	1. Assist the Tribe with funding or technical assistance to provide access to clean drinking water for its tribal members that do not have plumbing to access that clean drinking water.	Southern Ute Indian Tribe	Melvin Baker
21302	6	HHS - Human Health and Safety	Protection of municipal water supplies. Phoenix continues to believe that Reclamation can and should provide further guidance related to the agency's ability to take extraordinary actions to protect human health and safety within its governing legal authorities and available discretion under the Law of the River. This guidance is critical to help municipal and industrial users develop realistic adaptation strategies and make appropriate investments that can prepare large populations and critical industries to make required changes to infrastructure, processes, and public expectations during worst-case conditions. As detailed in our pre-scoping letter of September 1, 2022, which is incorporated here by reference, given the scope of its existing legal authorities, we urge Reclamation to expressly consider and recognize its authority to address human health and safety concerns in at least the following areas: i. Reclamation's authority to undertake at least limited departures from the Basin's "priority system" where necessary to protect critical infrastructure, preserve health and safety, and meet fundamental federal objectives such as national security; ii. Reclamation's clear authority to act to limit particular types of water uses and mandate improved efforts at conservation for various water use sectors, particularly during critical conditions; and iii. Reclamation's clear authority to de-prioritize operational and timing considerations related to hydropower generation in the context of ensuring water deliveries. Just as importantly, however, because taking such an action would likely be highly disruptive to system operations, would undermine the settled expectations of various water rights holders, would almost certain ly lead to litigation, and is otherwise not at all desirable, Reclamation must specifically define the limited and extreme conditions under which this sort of intervention would occur. A basic management objective should then be to operate the system in such a manner that those conditions are never reached.	City of Phoenix	Cynthia Campbell
21302	22	HHS - Human Health and Safety	Human Health & Safety. The scope of Reclamation's analysis should include an analysis of human health and safety impacts and Reclamation's authority to address human health and safety concerns. Reduction in Colorado River flows and available water supplies can lead to severe impacts on communities' livelihood. Areas for analysis include water levels sufficient to operate drinking water treatment facilities; communities with no or limited alternative water supplies; quality of life standards as opposed to minimum level necessary for survival (e.g. parks and trees to mitigate demonstrated heat island impacts in addition to drinking water requirements); increased cost of water services on vulnerable populations; and time and resource constraints of developing and building new water infrastructure. With the trend of warming conditions in the Basin and the dependance of many users on the River to supply drinking water and maintain a healthy quality of life, this human health and safety analysis will be critical to determining the operation of the reservoirs to prevent the Basin's citizens from experiencing a "day zero" event.	City of Phoenix	Cynthia Campbell
654	2	MEXICO - Water with Mexico	And ensure consideration of environmental flows to the Delta in the IBWC, post Minute 323 discussions. Environmental flows to the delta have been a great success. I know because IÂ'm the head o the binational science team that has been monitoring the effects.	University of Arizona	Flessa, Karl W - (kflessa)
654	10	MEXICO - Water with Mexico	IÂ'm also glad to see an intention to continue to engage with Mexico on managing the river. Minute 323 has been a success Â– including the engagement with NGOs and allocations for environmental purposes. HereÂ's hoping that IBWC can follow the BureauÂ's lead in broadening participation in decision-making.	University of Arizona	Flessa, Karl W - (kflessa)

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782	8	MEXICO - Water with Mexico	Fourth, USBR must negotiate with Mexico to let an estimated 10% of the total water in the river flow through the Colorado River Delta to the Sea of Cortez every year. It's time to partially return the flora and fauna to the Delta described by Aldo Leopold over 100 years ago in 1922 in The Sand County Almanac	Save the Colorado	Gary Wockner
810	1	MEXICO - Water with Mexico	Also, we should honor our treaties with Mexico regarding the river.		Richard Van Aken
832	7	MEXICO - Water with Mexico	4. Letting 10% of the riverâ€™s total water flow into and through its Delta in Mexico to sequester carbon in Delta wetlands and mangroves.		Gary Wockner
12806	4	MEXICO - Water with Mexico	Excess Water to Mexico: This issue was to be solved by the construction of the Brock Reservoir. This is an issue that falls in the lap of the Bureau. The Yuma office of the Bureau orders all the water for the lower Colorado River & Mexico. When they theoreticallyfill the 8,000 acre feet Brock Reservoir 15 times in one year & still delivers an average of 38,000 acre feet over the last 12 years, some adjustment is in order. The Post 2026 Guidelines must address this issue. That portions ordered by the AZ & CA users does not always match the total of Excess Water going to Mexico. With the falling elevation of water in Lake Mead & Lake Powell the on going orders must be held to a bare minimum. With the storage in Senator Wash & Brock Reservoirs & 3 days of travel time between Imperial & Parker Dams they should be able to manage the water more efficiently. If they run short, they will just have to live with it.		Curtis Cloud
16804	12	MEXICO - Water with Mexico	Finally, the Post 2026 Guidelines process should respect Mexico's role as a critical partner in Colorado River management to the extent possible. Over the last two decades, the U.S. and Mexico have worked increasingly collaboratively to address some of the most challenging issues in the Colorado River Basin.9 These efforts led to the successful development and implementation of Minutes 319 and 323 to the 1944 U.S.- Mexico treaty, which outline and enact binational efforts around river health and environmental restoration in the delta region, shortage sharing across national borders, and other important aspects of transboundary river management. Critically, however, Minute 323 also expires at the end of 2026. While we understand that the Post 2026 Guidelines process addresses water management only in the U.S portion of the basin, and that a "parallel process" with Mexico will occur under the purview of the International Boundary and Water Commission to presumably produce another Minute, we feel it is critical that Reclamation recognizes and builds upon these successful binational management efforts and supports continued collaboration between the U.S. and Mexico in their own process as well. This could occur through consistent and transparent coordination between the Reclamation ansd IBWC processes.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16940	2	MEXICO - Water with Mexico	USBR must negotiate with Mexico to let an estimated 10% of the total water in the river flow through the Colorado River Delta to the Sea of Cortez every year.		Jed Koller
17241	12	MEXICO - Water with Mexico	Prioritize Mexico's role in Colorado River management - The benefits of increased collaboration with Mexico in recent treaty agreements (Minutes 316, 319, and 323) are broadly recognized, including increased supply reliability for all water users, increased water conservation, and binational collaboration to protect and restore habitat in the Colorado River Delta. While Reclamation must allow the International Boundary and Water Commission (IBWC) to lead Colorado River negotiations with Mexico, Reclamation should prioritize coordination with, and capacity support for, the IBWC to ensure the United States can prioritize future collaborative management with Mexico. Specific suggestions include: * provide bilingual specialists dedicated to working with IBWC in the binational process to define management options for evaluation and metrics for impact assessment; * in partnership with Mexico, evaluate the potential for a revised salinity agreement to result in conserved water for Lake Mead, and the potential for revised groundwater agreements to increase supply reliability for water users in both countries; * ask Mexico for an inventory of projects that could conserve water (if needed, provide resources to develop this inventory); and * ask Mexico for an inventory of needs related to Colorado River Delta habitat restoration including the dollars and water needed to extend and expand the benefits created under Minutes 319 and 323.	National Audubon Society	Jennifer Pitt
17241	18	MEXICO - Water with Mexico	Other resource impact analyses should include (but not be limited to): - Reclamation's ability to comply with the requirements of Minute 242;	National Audubon Society	Jennifer Pitt
20341	8	MEXICO - Water with Mexico	The 1944 Mexican Water Treaty also provides for Mexico to participate in proportional consumptive use reductions in times of extraordinary drought, and Reclamation should address this obligation in its NEPA analysis to provide for any actions that might be necessary under future Minutes as well as the Upper and Lower basins' obligation to provide for their respective halves of the Treaty delivery requirement.	Imperial Irrigation District	Shields, Tina L
20431	8	MEXICO - Water with Mexico	The process to develop the successor agreements to Minute 323 with Mexico is proceeding concurrently with the NEPA process to develop the next operating guidelines. It is critical that these processes inform one another and maintain a spirit of collaboration and cooperation with our international partners. SRP continues to support efforts towards an equitable solution for all Colorado River parties.	Salt River Project	Leslie Meyers

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20471	4	MEXICO - Water with Mexico	While we recognize that negotiations with Mexico may not be within the Bureau's control, we encourage the use of the same processes that have previously led to the successful development of Minutes with Mexico.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	8	MEXICO - Water with Mexico	We understand that the Post-2026 Operating Guidelines stressed the domestic aspect, but IEDA would encourage the Bureau to work with the International Boundary & Water Commission to renegotiate the 1944 Water Treaty. Some would claim that the treaty has priority over present perfected rights. Prior to the initial negotiations, Mexico was using only 750,000 AC-FT. If Mexico's treaty amount of 1.5 MAF is protected and prioritized, what once was roughly 10% of the allocation is now approximately 25% of the runoff of the last three years. At a minimum, IEDA would encourage a reduction to 1 MAF until such time as normal hydrology returns. The activities in the Ukraine have highlighted the importance of food security and agriculture. Arizona agriculture has put the Colorado River to beneficial use, providing food and fiber on a regional and national basis. For example, Pinal County Agriculture accounts for 45% of all Arizona Cattle and calf sales and 39% of all Arizona milk sales (2018 University of Arizona study) and Yuma County is responsible for 90% of the winter leafy green vegetables grown in the United States (Yuma Fresh Vegetable Association). Any actions taken should balance the food security issue with the efforts to protect the river system.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20480	7	MEXICO - Water with Mexico	Continued collaboration with Mexico is critical for success of Post-2026 reservoir operations and management. Collaboration with Mexico is critical to charting the course of Colorado River through Post-2026 operations. While we recognize that any actions involving deliveries to Mexico will be determined through a separate process involving the International Boundary and Water Commission (IBWC), we expect that process to occur simultaneously. In particular, and the Post-2026 EIS should consider and evaluate potential future actions to ensure environmental compliance. Additionally, the active and direct participation of the Basin States' representatives in formal meetings with Mexico has also been essential to the development and implementation of Minute Nos. 317, 318, 319, and 323. The direct engagement between the States, the U.S. (including both Interior and the IBWC) and Mexico has consistently demonstrated the path to success.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	28	MEXICO - Water with Mexico	Collaboration with Mexico is critical to charting the course of Colorado River through Post-2026 operations. While we recognize that any actions involving deliveries to Mexico will be determined through a separate process involving the International Boundary and Water Commission (IBWC), we expect that process to occur simultaneously and the Post-2026 EIS should consider and evaluate potential future actions to ensure environmental compliance. Additionally, the active and direct participation of the Basin States' representatives in formal meetings with Mexico has also been essential to the development and implementation of Minute Nos. 317, 318, 319, and 323. The direct engagement between the States, the U.S. (including both Interior and the IBWC) and Mexico has consistently demonstrated the path to success.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20482	3	MEXICO - Water with Mexico	Collaboration with Mexico is also critical. This should occur through a separate process involving the International Boundary and Water Commission. We expect that process to occur simultaneously with the Post-2026 EIS. Additionally, the active and direct participation of the Basin States in formal meetings with Mexico is essential.	State of Wyoming; State of Nevada; State of California; State of Arizona; State of New Mexico; State of Colorado; State of Utah	Brandon Gebhart; John Entsminger; JB Hamby; Thomas Buschatzke; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20489	17	MEXICO - Water with Mexico	and whether deliveries to Mexico or storage conditions at Lake Mead will be influenced as a result. Impacts considered should include the ability of the United States to comply with Minute 242, the Bureau's ability to use Yuma-area pumped return flows as a component of delivery to Mexico, the Bureau's ability to deliver water to Mexico at the rates and times requested (a key area of binational cooperation identified in Minute 323), and implications for the volume of water the Bureau must release from Lake Mead for Mexico's delivery. The Bureau should identify, analyze, and describe each of these impacts to ensure the United States and Mexico can continue to work collaboratively, with shared information, to maintain the benefits achieved under the terms of recent binational Colorado River agreements.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	32	MEXICO - Water with Mexico	a. Mexico/Delta - Post-2026 operational strategies and Minutes to the 1944 Water Treaty are interrelated. One will not be able to fully work without the other. Maintaining water and life within the system will depend in part on how binational relationships and opportunities will be considered and cultivated as throughout the NEPA processes.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	48	MEXICO - Water with Mexico	ii. Build upon existing relationships with Mexico. We appreciate the Scoping Notice's recognition that parallel planning with Mexico remains critical to the process. We strongly encourage an approach that ensures the binational process both moves forward with and meaningfully informs the development of management alternatives in the domestic NEPA process - both as a means to better coordinate domestic and international management of the river, and to ensure that the NEPA process includes sufficiently broad analysis to anticipate binational management initiatives and avoid limiting the scope of what may be possible in a future Minute. To this end, we recommend that the process also afford dedicated stakeholders with demonstrated record of helping advance binational solutions the opportunity to work with the federal and state governments to build upon the relationships between the US and Mexico and develop workable solutions that includes accounting for improving flows in the Cienega de Santa Clara and for restoring the Delta system's hydrologic connectivity and community values over the long-term.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20817	19	MEXICO - Water with Mexico	The NOI recognizes that Minute 323 between the United States and Mexico is scheduled to expire at the end of 2025. The United States, Mexico, and the Basin States must work through the appropriate binational process. This binational process will be separate from the development of the Post-2026 Operations; however, both processes should take place simultaneously.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20904	3	MEXICO - Water with Mexico	In addition, the 1922 Compact requires that the Upper Basin bear half the burden of supplying water to Mexico, which represents an additional 0.75 million acre-foot annual commitment under normal operations. Among the laws comprising the "Law of the River" including the Boulder Canyon Project Act of 1928, the Colorado River Storage Project Act of 1956, and the Colorado River Basin Project Act of 1968, the 1922 Compact is superordinate.		Craig Morgan; Mike Abatti; James Abatti
20919	3	MEXICO - Water with Mexico	The Compact also assigned responsibility for providing water to satisfy a future treaty with Mexico. Article III(c) provides: If, as a matter of international comity, the United States of America shall hereafter recognize in the United States of Mexico any right to the use of any waters of the Colorado River System, such waters shall be supplied first from the waters which are surplus over and above the aggregate of the quantities specified in paragraphs (a) and (b); and if such surplus shall prove insufficient for this purpose, then, the burden of such deficiency shall be equally borne by the Upper Basin and the Lower Basin, and whenever necessary the States of the Upper Division shall deliver at Lee Ferry water to supply one- half of the deficiency so recognized in addition to that provided in paragraph (d). Article III(d) prohibits the Upper Division States from depleting the flow of the river at Lee Ferry below a rolling 10-year aggregate of 75 maf. Article III(c) requires the Upper Division States to provide sufficient water1 to satisfy one-half of the Mexico delivery obligation. If the 10-year rolling aggregate falls below the required aggregate volume, or if the Upper Division States fail to provide the necessary water to satisfy its share of the Mexico delivery obligation, the Upper Division States could be subject to a "Compact call" that would require a reduction in consumptive use in the Upper Basin. Alternatives evaluated in the Post-2026 EIS should include actions necessary to ensure compliance with such obligations.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	8	MEXICO - Water with Mexico	nclusion of Mexico Article 10(b) of the 1944 Treaty between the United States and Mexico on the "Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande" (1944 Treaty) allotting Mexico 1.5 maf annually from the Colorado River provides for proportional consumptive use reduction to Mexico "in the event of extraordinary drought or serious accident to the irrigation system in the United States, thereby making it difficult for the United States to deliver the guaranteed quantity of 1.5 maf." In years in which the Secretary imposes additional reductions to consumptive use in the Lower Basin states of Arizona, California and Nevada, the United States must also exercise its authority to analyze commensurate reductions to Mexico. In recent years, Mexico has agreed to voluntary reductions in proportion with those in the Lower Basin. While any reductions to Mexico would be developed and implemented through a separate process, Reclamation should analyze the potential impacts of additional reductions that appropriately fall to Mexico under the Treaty, to allow room for negotiation and diplomacy.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman

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20927	6	MEXICO - Water with Mexico	The United States should continue to work with Mexico through the International Boundary and Water Commission to provide for shortage sharing under the 1944 Treaty with Mexico.	Front Range Water Council	Alan Salazar
20932	14	MEXICO - Water with Mexico	The NOI recognizes that Minute 323 between the United States and Mexico is scheduled to expire at the end of 2025. The United States, Mexico, and the Basin States must work through the appropriate binational process. This binational process will be separate from the development of the Post-2026 Operations; however, both processes should take place simultaneously.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20938	12	MEXICO - Water with Mexico	Utah also supports appropriate binational discussions with the Republic of Mexico on potential actions Mexico may be willing to undertake to protect the system when Minute 323 of the 1944 US-Mexico Water Treaty expires in 2026. We encourage the Department of Interior to coordinate with the International Boundary and Water Commission, while engaging with the Basin States, on parallel processes to develop post-2026 binational agreements with Mexico as this domestic NEPA process proceeds.	Colorado River Authority of Utah	Betsy Coleman
20945	23	MEXICO - Water with Mexico	Colorado supports the efforts of the United States and Mexico through the International Boundary and Water Commission to engage in the separate but concurrent binational process to complement any guidelines for Post-2026 Operations at Lake Powell and Lake Mead.Colorado further supports the inclusion of the Basin States in the binational process.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20946	1	MEXICO - Water with Mexico	1 The Association recognizes that any revisions to the delivery obligations to Mexico are outside the purview of the EIS. However, the Association believes that if water deliveries are curtailed to the Lower Basin states, deliveries should be curtailed to Mexico as well.	Yuma County Water Users' Association	James Auza
20952	6	MEXICO - Water with Mexico	* Discuss the ability of the U.S. to meet its treaty obligations to Mexico and identify current access challenges and potential to exacerbate border sanitation and water quality impacts.	Environmental Protection Agency Region IX	Robin Truitt
20952	25	MEXICO - Water with Mexico	INTERNATIONAL CONSIDERATIONS Tijuana, Mexico is particularly vulnerable to reduced water allocations due to drought since more than 90% of its water supply is sourced from the Colorado River. Mexico's permanent 3 percent reduction (45,000 acre-feet) to their annual allocation of 1.5-million-acre feet of water took effect in 2022 in accordance with Minute 323 signed in 2017. As a result, there is high interest at all levels of the Mexican government in pursuing reuse of treated wastewater to diversify the city's water supply, keep up with demand, and increase wastewater treatment. Under the Statement of Intent and Minute 328 signed in 2022, the EPA committed $10M from the Border Water Infrastructure Grant Program (BWIP) towards a project that would pipe effluent from two wastewater treatment plants in Tijuana (La Morita and Arturo Herrera) upstream of the Rodriguez Reservoir for indirect reuse. This project is a high priority for Mexico and would be one of the first projects of its kind in the country. Once the feasibility studies and design are complete (expected end of 2024), Mexico would need to secure the match to the EPA's BWIP funds to finance the construction, which would take several years to complete. The Bureau of Reclamation could provide funding for water conservation projects in Mexico in exchange for a one-time allotment of Colorado River water under Minute 323, "Extension of Cooperative Measures and Adoption of a Binational Water Scarcity Contingency Plan in the Colorado River Basin." Funding from the U.S. could support effluent reuse projects, including projects at San Diego-Tijuana if there were a Colorado River benefit. We recommend Reclamation include discussions in the Draft EIS about reuse projects and funding such projects to reduce dependence on Colorado River water in Mexico. Analyze impacts from cuts and transfers to Mexico on the Colorado River delta, border sanitation and water supply. Consider how the alternatives may adversely and disproportionately affect growing transboundary communities and the movement of transboundary populations with potential environmental justice concerns.	Environmental Protection Agency Region IX	Robin Truitt
20963	14	MEXICO - Water with Mexico	[...] i. Reaching agreement with Mexico on use of Colorado River resources after expiration of Minute 323 and a commitment to continue to have an open dialogue that encourages engagement. Specifically, engage the International Boundary Water Commission in this NEPA planning process.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20985	4	MEXICO - Water with Mexico	Further, as other major tenets of the Law of the River, the Bureau should analyze whether proposed alternatives meet the 1922 Colorado River Compact non-depletion obligations and delivery obligations to Mexico. Any proposed and/or analyzed alternatives should include actions necessary to ensure compliance with such obligations.	Bard Water District	meghan noblelaw.com; Ray Face
21038	2	MEXICO - Water with Mexico	The U.S. - Mexico collaborative relationship has produced Minutes 316, 319, and 323, agreements that significantly improved Colorado River management. These agreements have given Mexico its proper place as an equal partner in determining Colorado River management, have improved supply conditions for all water users in the basin by reducing shortage probabilities, and have set in motion binational, collaborative work to protect and restore habitat in the devastated Colorado River Delta ecosystem. We hope Reclamation will consider it a priority to maintain the improved binational relationship on the Colorado River, and to ensure that future analyses of the Lower Basin Plan fully identify and describe potential impacts in Mexico, including impacts on water delivery and on habitat resources.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas

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21038	3	MEXICO - Water with Mexico	While there will be limits to the scope of Reclamation's post-2026 Colorado River guidelines, these guidelines will be better served if we all anticipate parallel processes, including the successor to Minute 323. If designed in tandem, the post-2026 Colorado River guidelines and these parallel processes could provide greater water supply reliability for human uses and for nature. Reclamation's consideration of parallel processes will be essential to preserving the improved United States - Mexico relationship on the Colorado River, including the progress made on equitable sharing of water shortages and on habitat restoration in the Colorado River Delta.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21038	5	MEXICO - Water with Mexico	Under the terms of Minute 242, Reclamation must deliver water to Mexico at the Northerly International Boundary that does not exceed 115 +/-30 ppm the salinity of water as measured at the Imperial Dam.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21038	6	MEXICO - Water with Mexico	Reclamation's management includes both mainstem Colorado River water and Yuma-area pumped return flows as components of water delivery to Mexico at the Northerly International Boundary. Because the Lower Basin Plan may change the salinity of water measured at Imperial Dam due to changes in Hoover Dam releases and changes in return flows upstream from Imperial Dam, there are implications for how Reclamation delivers water to Mexico.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21038	10	MEXICO - Water with Mexico	Since 1979, federal agencies have been required by Executive Order 12114 to evaluate transboundary impacts of significant actions. We anticipate that Mexico and the United States will reach agreements about how Mexico shares in additional Colorado River shortages in separate, diplomatic processes. Independent of any such agreement, proposed domestic actions will continue to have an impact in Mexico, and the Cienega is a case in point. It will be important for Reclamation to identify and describe any potential impacts of the action alternatives at the Cienega. With information about these impacts, the United States and Mexico have the opportunity to use the existing collaborative framework on Colorado River management to protect the Cienega. In 2010 the United States and Mexico negotiated terms to secure the quantity and quality of water flowing to the Cienega in Minute 316.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21278	2	MEXICO - Water with Mexico	Mexico deserves to receive its full treaty allocation.		Bob Dorsett
21301	4	MEXICO - Water with Mexico	Evaporative and other system losses attributable to deliveries of Mexican Treaty waters should be analyzed as apportioned between both basins, as both basins have an obligation to deliver a portion of the Treaty water.	Mohave County Water Authority	Jamie Kelley
1	2	MIT - Mitigation	The proposed 10 year plan will barely touch the surface mitigating the air and water quality issues.		Linda Joy Salas
13	2	MIT - Mitigation	It appears that for 80 years the reason that it all worked was because the Approbation States didn't take their share, they gauge immediately upstream from Lake Powell appears to not measure discharge. So do you know how much water has been flowing into Lake Powell over the last 80 years and has that been in excess of half of the river's allocation and the arrangement, as it appears. California and Arizona are going to be paid for leaving water in Lake Mead and the States that have been providing excess water all of this time get nothing that seems pretty unfair to me, and I wondered if you're going to do anything in the way of compensation for the aggregation States.		Michael Carpenter
9996	1	MIT - Mitigation	Heavy consumers should be taxed for mitigation costs, rather than adding to our debt burden.		John P Chambers
10189	1	MIT - Mitigation	Encourage more conservation easements!!		Cary Fassler
12848	6	MIT - Mitigation	In Colorado, towns are all required to submit Water Efficiency Plans to the CWCB on a 5 or 7 year basis. The BUR should require updates on water efficiency measures implemented in each of the Upper and Lower Basin states.		Lisa Buchanan
17102	1	MIT - Mitigation	We urge the BOR to fully assess the environmental impacts of its proposed alternatives and require mitigation for unavoidable harmful environmental impacts.	Lahontan Audubon Society	Rose Strickland
17241	9	MIT - Mitigation	For action alternatives that degrade the health and sustainability of these habitats, Reclamation should, as a component of action alternatives, define and evaluate the impact of habitat mitigation.	National Audubon Society	Jennifer Pitt

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17241	44	MIT - Mitigation	Define possible mitigation actions that can be evaluated in tandem with the action alternatives - Reclamation's analyses of proposed action alternatives are expected to show negative impacts to Colorado River-dependent habitats and other environmental resources. We urge Reclamation to define mitigation actions as a component of action alternatives. It will be extremely helpful to understand if and where reasonable mitigation actions are available. Identifying these actions may allow environmental stakeholders to support action alternatives that might otherwise be unacceptable.	National Audubon Society	Jennifer Pitt
20328	3	MIT - Mitigation	* Ultimately, environmental impacts associated with Colorado River operations cannot be adequately mitigated unless allocations are permanently reduced and environmental, community, and tribal needs are prioritized above the production of animal feed.	Comite Civico Del Valle	Max Gomberg
20438	27	MIT - Mitigation	6. Resource protection and mitigation practices into operational and management decisions;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20478	8	MIT - Mitigation	The inclusion of alternative incentives, such as facilitating emergency water leasing agreements between contract holders during severe shortage reductions or to pay for recovery of stored water credits, might allow for those smaller projects to be completed, collectively resulting in a significant water savings.	Lake Havasu City	Cal Sheehy
20489	4	MIT - Mitigation	iii. The post-2026 NEPA evaluation should include mitigation and stewardship measures as part of proposed action alternatives to help avoid or minimize impacts to resources critical to the health and ecological integrity of the Colorado River Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	22	MIT - Mitigation	If it is not possible for the Bureau to pinpoint the direct or indirect impacts to specific water users, communities or resources within the Basin, the environmental impact statement still needs to identify and describe as best it can the breadth and extent of the potential consequences, including consequences off the river where water supply will change - i.e., a general discussion on the range of possible consequences that the Basin should be prepared to absorb. This could include generalities where necessary to describe impact possibilities on the human environment (communities, economies, cultural values, livelihoods) and natural resources (soils, surface and groundwater sources, air, vegetation, wildlife, habitats, etc.) if significant reductions to available water supplies are not mitigated going forward. It could also identify current and potential mitigation opportunities (such as incentives to maintain cover crops) that may help minimize the general effects. To this end, the Bureau recently announced an agreement to provide significant funds to help mitigate the impacts of the worsening drought crisis impacting the Salton Sea. The Bureau should expressly identify and consider this and other current or foreseeable actions that will complement the post-2026 Guidelines to fully characterize the benefits and impacts in the Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	31	MIT - Mitigation	vi. Integrating and accommodating mitigation and stewardship measures: Incorporating environmental mitigation and management strategies into the decision-making processes. Environmental laws have expanded the Bureau's responsibilities beyond managing the federal infrastructure to allocate water supplies. They further require the Bureau to consider how to best accomplish that responsibility in an environmentally sound manner. To that end, the post-2026 Guidelines should integrate, where possible, mitigation and stewardship measures as part of the proposed actions to help minimize impacts to resources critical to the continued functioning and character of the Colorado River Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20899	27	MIT - Mitigation	12. Outline all mitigation programs currently financed by hydropower revenues and provide reports on outcomes.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20947	4	MIT - Mitigation	The first purpose of the 2007 interim guidelines includes that Reclamation management should consider effects on recreation and the environment, however there is no element that addresses that specifically. Without providing specific direction on measures to protect and enhance environmental and recreation values, it will be difficult to fulfill the identified purpose. A new element should be established that addresses these values and what steps must be taken to fully assess and mitigate the effects on river recreation and the environment.	American Whitewater	Kestrel Kunz
21081	12	MIT - Mitigation	Assuming programs that fund farmers to fallow fields temporarily or permanently will be implemented in the coming years, it will be important to consider funding for restoration. If fields are to come out of production, helping farmers with costs such as seed is critical to help improve the quality of the land in an uncultivated and natural state.	Dolores River Boating Advocates	Rica Fulton
21302	26	MIT - Mitigation	Mitigation measures to address expected climate impacts relevant to operations and the impacts of the selected alternative should be identified and considered in the NEPA review. Climate change impacts are also likely to be highly unpredictable and uncertain, which means that Reclamation should consider how it can monitor changes in condition, commit to necessary data collection to ensure the availability of monitoring data, and propose strategies to adjust or undertake future mitigation and monitoring.	City of Tucson	Cynthia Campbell
14798	1	NEWNM - New National Monument Baaj Nwaavjo	Iâ€™m thrilled with President Bidenâ€™s decision to create the newest national monument! But so much more must be done.		Meg Greene
16228	1	NEWNM - New National Monument Baaj Nwaavjo	The added monument is brilliant. I thank The President.		Lisa Hammermeister
16727	3	P&N - Purpose and Need	We strongly encourage Reclamation to define the purpose and need of the post-2026 guidelines in the broadest possible terms.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	4	P&N - Purpose and Need	Ultimately, the objective of the post-2026 guidelines should be "to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans" (42 U.S.C. 4331(a)).	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	5	P&N - Purpose and Need	The purpose and need must be broader than just "Operational Guidelines and Strategies for Lake Powell and Lake Mead." The Notice of Intent states that "Future operational guidelines and strategies should incorporate a more holistic approach to Colorado River water management in a way that focuses on the long-term sustainability of both the Basin's population and natural environment, minimizes system vulnerability, and increases system resiliency." [emphasis added] Reclamation should prioritize long-term sustainability over narrowly-defined operating strategies for Lake Powell and Lake Mead. The reservoirs are a means to an end, a tool to stabilize the system. Preserving reservoir elevations is not a higher priority than the people and the natural environment that depend on the river.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann

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16727	11	P&N - Purpose and Need	We are hopeful that Reclamation will broaden the purpose and need and the scope of the post-2026 guidelines sufficiently to avoid a set of deficient alternatives incapable of addressing the significant challenges facing the system, a deficiency that would prompt closed-door negotiations among the principals, betraying Reclamation's transparency and lead to a less durable solution.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
17202	1	P&N - Purpose and Need	As an overarching theme, CREDA strongly urges the foundation of the Post-2026 Guidelines and Strategies be based on Commissioner Touton's April 26, 2023 testimony before Congress: "Reclamation's projects and programs serve as the water and power infrastructure backbone of the American West..." . Throughout the Post-2026 NOI reference is made to "the system", which is comprised of both water and power infrastructure. The Purpose and Need, Scope and ultimate Operational guidelines and strategies developed for post-2026 must reflect the inextricable legal, economic and management linkage between water and power infrastructure and operations in the Colorado River Basin.	CREDA Colorado River Energy Distributers Association	Leslie James
17241	13	P&N - Purpose and Need	Adopt a broader "purpose and need" for the Post-2026 Operational Guidelines that are responsive to developments since the 2007 Guidelines were adopted.	National Audubon Society	Jennifer Pitt
17241	15	P&N - Purpose and Need	Audubon suggests consideration of the following for the purpose and need for post-2026 Colorado River guidelines: A. improve Reclamation's management of the Colorado River by considering management that does not exclude an equitable and sustainable supply of clean water to support vulnerable communities; B. improve Reclamation's management of the Colorado River by considering management that is protective of remaining habitats; C. improve Reclamation's management of the Colorado River by anticipating future flows impacted by climate change; D. consider new governance and stakeholder processes that operate on a timeframe that allows adaptation to conditions that may evolve beyond the scope of what is considered in post-2026 guidelines, for example with biennial public review of the operating guidelines' adequacy in the context of current hydrologic conditions; E. clarify how management of reservoirs above Lake Powell factor into water availability for the Basin, and consider how their operations might include efforts to improve aquatic and riparian habitats; F. consider trade-offs between reliability of the Colorado River water supply stored in Colorado River reservoirs and the quantity of Colorado River water deliveries to water users, recognizing the effects of unpredictable water supplies on regional economies, vulnerable communities, and wildlife habitats; G. provide all users of Colorado River water a greater degree of predictability with respect to the amount of annual water deliveries in future years, particularly under drought and low reservoir conditions; H. provide additional flexible mechanisms that provide or support incentives to conserve consumptive uses of water throughout the basin; and I. define mitigation for avoidable impacts to habitats and natural systems.	National Audubon Society	Jennifer Pitt
20417	12	P&N - Purpose and Need	With respect to Purpose and Need, WRA believes that the purpose and need for the federal action need to start from the experience-based outcome to date that the framework of the existing guidelines has proven to be inadequate to deal with climate change, declining and less predictable hydrology, and overuse of water given the actual supply over time. A "need" is for a Colorado River system that is less reactionary, more proactive and adaptive, and focused on resilience, which is the capacity to withstand or recover quickly from difficult and changing circumstances. A guiding "purpose" of the action and EIS analysis should be to operate and manage the Colorado River system holistically, not only for the important consumptive uses made in the Basin states, but also to maintain the integrity of the river itself and all of its resources. Accordingly, the Purpose and Need for the action could conceptually include, or even be stated as: "the development of guidelines for operation and management of federal water storage and distribution facilities, including but not limited to Glen Canyon Dam and Hoover Dam, as well as other federal activities within the greater Colorado River Basin, that holistically take account of and broadly seek to achieve the multiple benefits associated with consumptive water uses, non-consumptive water uses, and environmental needs and requirements related to the Colorado River."	Western Resource Advocates	Bart Miller
20417	13	P&N - Purpose and Need	Regarding the proposed federal action, this should be the action or actions that best achieve the broad and holistic purpose and need identified above. It should not simply be starting with existing guidelines that have been proven to be inadequate and, modifying them slightly, hoping for a better result. Therefore, while Reclamation can consider modification of the existing guidelines based on what has worked and hasn't since 2007, it should also think broadly about potential new paradigms or approaches to resolving new problems, including addressing the principles noted above.	Western Resource Advocates	Bart Miller

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20438	7	P&N - Purpose and Need	Purpose for the Post-2026 Guidelines The Purpose and Need of the Environmental Impact Statement for the 2007 Interim Guidelines failed to address the Colorado River Basin's operational and management needs for the 21st Century. The purpose of the next guidelines must be to establish a framework that will direct how the Basin will be managed and operated proactively to help provide water security for Tribal Nations, water users, communities, and economies. Such actions must account for hydrologic extremes and variable storage conditions due to drought and climate change conditions, and work to support the continued integrity of the Colorado River Basin's ecological, spiritual, and cultural resources. This purpose is achieved only if the Post-2026 Guidelines are developed in a manner that acknowledges and incorporates the rights and authorities of all Basin sovereigns and provides opportunities for considering and incorporating the varied interests of the full Colorado River community.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20469	16	P&N - Purpose and Need	Strengthen the Purpose and Need statement The first sentence of the "Purpose" segment of the Notice of Intent begins by stating, "To assure the continued stability of the Colorado River system into the future, Reclamation announces its intent to prepare an EIS for post-2026 operations...." GCRG contends that the Colorado River system is no longer stable or predictable -- it is in crisis because of the past decisions we've elucidated above which have led to significant imbalances and instabilities that are untenable, unsustainable, and must be rectified immediately. Throughout the 21st century, basin-wide consumptive use has so far exceeded the natural supply that the combined contents of Powell and Mead declined by 33.5 million acre feet between January 2000 and April 2023 - going from roughly 95% full to 22% full in that timeframe. (Schmidt, Yackulic, Kuhn, 2023) Consider this EIS process a "do-over" where it is imperative that we live within our means in regards to the Colorado River. The Purpose and Need statement must be clear-eyed about the profound crisis that faces us all, the hard choices that must be made, the urgency of the timeline for this EIS process, and the absolute necessity of using the best available science and resource-impact models for a robust EIS. Furthermore, the Purpose and Need Statement for the post-2026 Operational Guidelines EIS must acknowledge and utilize the terms climate change and aridification, defined as "the gradual change of a region from a wetter to a drier climate." We find it disturbing that these key words are entirely lacking throughout the June 16, 2023 Federal Register Notice of Intent - a significant oversight. Semantics matter! Simply put, drought is temporary, aridification is permanent. The phrase "prolonged period of drought" is no longer adequate to express the Colorado River crisis that has been building since 2000, making this period one of the driest in the last 1200 years. This is especially remarkable when in consideration of the record-setting global heat records experienced in 2023 and the prolonged periods of extreme heat experienced in central Arizona. We urge the Bureau of Reclamation to utilize the correct terminology which 1) underscores our new reality resulting from human-caused climate change and 2) highlights the absolute necessity of developing forward-thinking paradigms based on the best available science (including climate science) to manage the Colorado River wisely, sustainably, and proactively for our low water future.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20481	4	P&N - Purpose and Need	I. Purpose and Need The Post-2026 EIS must seek to provide reliability and water-supply certainty to the 40 million people who rely on the Colorado River for their lives and livelihoods. Operations of the two reservoirs must be consistent with the Law of the River and should respond to a wide range of hydrologies, storage conditions, and related elements in the Colorado River System, incorporating effective, flexible mechanisms to protect storage and critical elevations at Lakes Powell and Mead while providing predictable operations on which water users can rely. Most significantly, the Post-2026 operations should seek to address the imbalance between supply and demand on the Colorado River System in order to assure stability into the future.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke

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20489	11	P&N - Purpose and Need	the Purpose and Need for the post-2026 NEPA process must be bold enough to: i. help minimize the vulnerability of the Colorado River supply for water users as well as the natural and cultural environment to the instability caused by the Basin's water supply and demand imbalance and the reality of hotter and drier and yet unpredictable water futures. ii. help preserve the integrity of the Colorado River against system failure in a manner that considers and does not sacrifice the natural and cultural environment in the face of heightened uncertainty going forward. iii. support opportunities for building adaptation and resilience of both the Colorado River operational and environmental systems. The focus of the Purpose and Need, however, cannot stop there. Robust and adaptive guidelines must also recognize the role that Colorado River operations and strategies have in either complementing or obstructing parallel actions that can work to address the varied and complex challenges confronting the Basin. Overall, the Purpose and Need for the post-2026 Guidelines must expand the focus beyond managing a dwindling water supply to also identify and leverage efforts to provide water security for Tribal Nations, water users, economies, and the environment under unpredictable drought and climate change conditions in a manner that works to support the continued integrity of the Colorado River Basin's ecological, spiritual and cultural resources. Instructive directives and strategies for achieving these purposes are in Table 1 (attached).	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	36	P&N - Purpose and Need	Balancing Consumptive Uses and Losses with Available Water Supply During the period from 2000 to 2023, natural flow at Lees Ferry has decreased 13% compared to observed Lees Ferry flows between 1930 and 1999 (Schmidt et al. 2023). Flows may decrease by a similar amount or more by 2050, based on the work of various researchers (e.g., Udall and Overpeck 2017). However, the average consumptive water uses and losses have averaged approximately 14 maf annually from 2000-2020 (Schmidt et al. 2023). This clearly explains how storage in both Lakes Powell and Mead dropped from 95% of capacity in 2000 to ~25% in 2022. It also strongly suggests the need to couple water usage across the basin with accurate estimates of future water availability, based on the aridification trend. Reclamation's most robust operational strategies will emerge when the worst-case scenarios are contemplated and modeled, with lower water supplies and higher water demands than the Colorado system has faced in the past. Declining water availability caused by climate change, aridification, and low water levels in Lakes Powell and Mead make it imperative to responsibly manage consumption and system losses (demand) relative to annual inflows (supply). First stabilizing and then increasing water reservoir levels by balancing supply and demand will help maintain river dynamics below the dams and retain inter-annual and seasonal flow variability for a wide variety of riverine resources in the parks while also helping prevent system collapse of the water supply for 40 million people in southwestern United States. Responsible management should be characterized as an "inperpetuity" adaptive challenge, requiring group effort and changes in behavior to ensure that water is available in the future. Given the risk of system collapse presented by a sequence of very low flow years, stabilizing water levels in Lakes Powell and Mead is critical to the NPS. Furthermore, when wetter hydrologic conditions occur, reservoir water levels should be increased by stabilizing or reducing consumptive uses to ensure the reservoirs have sufficient storage to buffer the low hydrology years that will inevitably occur. Stabilization of reservoirs at higher levels will also protect over $1.8 billion annually in regional economic output from national park recreation and visitation important to communities in Utah, Arizona, Nevada, and California. These issues are critical for Reclamation to consider when writing the purpose and need for this process and when designing alternatives.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20608	2	P&N - Purpose and Need	Statement of Purpose and Need GCWC recommends the following Purpose and Need language: The purpose of developing the Post-2026 operational guidelines and strategies for Lake Powell and Lake Mead is to ensure the long-term and dynamic integrity of the natural, cultural, and sustainable economic community values of the Colorado River Ecosystem, from its headwaters to its delta in Mexico, and additionally to support climate resilience and holistic management flexibility and adaptability for this river system. The need to develop new environmentally just guidelines, strategies, and ultimately paradigms for Colorado River management/stewardship is extremely urgent. That urgency is to implement actions within the next 2-3 years, to prevent system collapse ecologically, economically, and socially, that would result from failing to recognize, adaptively anticipate, and proactively prepare for extreme conditions and climate instability. These guidelines and strategies necessarily involve in-stream flows; water storage and delivery; basis in scientific reality; managing for the most productive riparian habitat throughout the Colorado River basin (e.g. cottonwood and tree willow, riparian gallery forest) to support climate resilience; and inclusivity of Tribal perspectives, their cultural connection to water, and their traditional ecological knowledge--because the basin is already experiencing rapid and even accelerating climate change effects, especially the number and duration of excessive heat waves and long term aridification.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20700	6	P&N - Purpose and Need	The purpose and need of the post-2026 guidelines must include maintaining the sustainability of the Colorado River and its tributaries.	Grand Canyon Trust	Jen Pelz

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20700	8	P&N - Purpose and Need	Further, we believe some vital statements already submitted to Reclamation about how the river is valued and the requests of some of the basin tribes need to be highlighted and considered in developing the purpose and need for the new guidelines, including the quotes below: * The highest priority must be given to keeping the Colorado River flowing as a living river. -Quechan Indian Tribe * The Life of the River and all that depend on its waters must be preserved and protected. -The Colorado River Indian Tribes * The Nation encourages focus on the long-term goal--stabilizing and protecting the river for years to come. -Jicarilla Apache Nation * The low water at Lake Powell is a direct result of drought conditions also faced by the Navajo Nation. These circumstances reflect an environmental imbalance that threatens the physical and spiritual wellbeing of Navajo People. Our effort to inform your agency of the effects of drought on the Navajo Nation requires us to impart impacts to both material and traditional cultural lifeways. -Navajo Nation * The Post-2026 Operating Guidelines should not only deal with management of Lake Mead and Lake Powell but should also consider the integrity and health of the Colorado River and its tributaries. -Southern Ute Indian Tribe * With respect to the management strategies, recognizing the value of the river as a river and its spiritual, cultural, and ecological significance to Tribes and others can be part of the purpose and need in the NEPA process(es), and accounting for and modeling the full extent of Tribal water rights could be integrated into the NEPA evaluation. -Water and Tribes Initiative We agree with the statements above and believe that the only way to acknowledge and honor the Colorado River as a river with intrinsic value is to incorporate into the purpose and need of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20700	9	P&N - Purpose and Need	Further, even the purpose statement in the most recent NOI "to assure the continued stability of the Colorado River system into the future" fails to capture the nuance of protecting the sustainability of the river itself. 88 Fed. Reg. at 39456. The sustainability of the "system" and the sustainability of the "river" are not the same thing. If we want to transition away from the old guidelines that were deemed "insufficient" to protect against system collapse,6 the purpose of the post-2026 guidelines need to be reassessed or at a minimum expanded. A goal or purpose of the new guidelines should include a statement regarding the need to, "protect the long-term sustainability of the Colorado River and its tributaries." Some examples of language based on the suggestions above from some of the tribes could include: to "preserve and protect" the river, "to keep it flowing as a living river," "to stabilize and protect it for years to come," "to restore balance and protect the spiritual and physical wellbeing of native peoples and cultures," "consider the integrity and health of the river and its tributaries," or to "recognize the value of the river as a river and its spiritual, cultural, and ecological significance to Tribes and others." With this as a central theme, it allows the post-2026 decision framework to incorporate and include these considerations that are now only an afterthought.	Grand Canyon Trust	Jen Pelz
20700	10	P&N - Purpose and Need	We request integrating and prioritizing the intrinsic value and health of the river and its tributaries into the goals and objectives of the post-2026 guidelines as well as specifically including it in the scope of the EIS analysis.	Grand Canyon Trust	Jen Pelz
20700	13	P&N - Purpose and Need	In crafting these new objectives, Reclamation should consider the values we articulated above including: 1) the health and integrity of the Colorado River and its tributaries; 2) tribal sovereignty and water security of the 30 tribal nations; 3) equity for both people and nature; 4) the importance of and need to conserve groundwater resources; and 5) sustainability for present and future generations.	Grand Canyon Trust	Jen Pelz
20700	17	P&N - Purpose and Need	We appreciate that values are changing and that there is more acknowledgement of these inherent environmental and cultural importance of the river and its tributaries; however, the effort to incorporate these values into the laws, policies, rules, and guidelines that ultimately determine the management and operation of the river and its infrastructure on a day-to-day and year-to-year basis lags behind. Incorporating these values into the purpose and need of the guidelines would be a great first step, but ultimately these values need to be incorporated objectively into specific environmental and cultural goals that guide management, much the same as the tiered shortage tables guide water deliveries or shortages in the Lower Basin or the releases from Lake Powell.	Grand Canyon Trust	Jen Pelz
20738	5	P&N - Purpose and Need	Our changing climatic conditions and the experience of the past two decades also illustrate why the purpose and need of the post-2026 EIS must be more broadly formulated than that of the 2007 IGs.	Quechan Indian Tribe	Jordan Joaquin

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20899	35	P&N - Purpose and Need	INCORPORATE TRADITIONAL KNOWLEDGE AND WISDOM FROM THE TRIBAL COMMUNITY VISION: THE WATER AND TRIBE INITIATIVE AND THE BLUFF PRINCIPLES When Reclamation convenes the promised engagement meetings with the tribes, we recommend that baseline and holistic discussions follow the Bluff Principles, which emerged from a series of conversations among Hopi, Ute and other tribal leaders in Moab and Bluff, Utah, in 2016. 11 12 Many of these suggestions will help to define the goals to achieve sustainability and resiliency, as mentioned in the Notice of Intent. 1. Clean water for all peoples. 2. Honoring sacred sites and the religious beliefs of all peoples. 3. A holistic approach to water management that focuses on the ecosystem. 4. Educating the public on the value of water: water is life. 5. Using science to improve our understanding of water quality and quantity. 6. A focus on collaborative, inclusive policymaking. 7. A water regime free of racism and prejudice. 8. An ethic that emphasizes concern and caring for everyone, downstream and upstream. 9. A goal of stewardship; leave the Earth and its water systems better than we found them. 10. Equity and fairness should be basic features in all water allocation decisions. 11. Understand that traditional wisdom, especially from the Elders, is critical. 12. A sense of urgency; we must act now before the problems become overwhelming. I 13. We must think of the welfare of future generations, not just for our own time. 14. Water is a gift provided by the Creator and should be sacred, shared, and loved.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	1	P&N - Purpose and Need	Purpose of EIS The purpose of the EIS should be more broadly defined than previously described in the development of the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines). The purpose should reflect the future stability of the Colorado River system taking into account existing laws and regulations and the priorities of the river's water users. Less emphasis should be placed on maintaining minimum reservoir elevations for power production than was done in the 2007 Interim Guidelines.		Craig Morgan; Mike Abatti; James Abatti
20919	1	P&N - Purpose and Need	a) Purpose of the Post-2026 Operational Guidelines The Post-2026 Operations must achieve the highest level of reliability and water supply certainty to Colorado River water users. Post-2026 Operations should respond to a wide range of hydrologies and storage conditions incorporating effective, flexible mechanisms to manage storage and critical elevations while providing predictable operations on which the water users can rely. Most importantly, the purpose of the Post-2026 Operations should seek to balance supply, demand and the use of storage in the Colorado River system for the benefit of water users and the environment. The Post- 2026 Operations should be resilient across a wide range of hydrologic scenarios that consider impacts of climate change. The Post-2026 Operations must also consider the water supplies available to the Basin States and Mexico and ensure that the burden of any system imbalances and national obligations do not fall solely or primarily on CAP or junior water users.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20932	7	P&N - Purpose and Need	III. PURPOSE AND NEED The 2007 Guidelines remain in effect through December 31, 2025, (through preparation of the 2026 Annual Operating Plan). In order to have a new management system in place by the time the 2007 Guidelines expire, the Secretary has directed Reclamation to develop new guidelines for Post-2026 Operations at Lake Powell and Lake Mead. Over 15 years of operational experience illustrate that the 2007 Guidelines are insufficient to properly manage Lake Powell and Lake Mead. Extended periods of dry hydrology and depleted reservoir conditions have highlighted the inadequacy of the 2007 Guidelines to adapt to worsening hydrology and increased uses. Storage releases under the 2007 Guidelines do not appropriately respond to actual hydrologic conditions. Under the 2007 Guidelines, shortages in the Lower Basin are triggered at elevations when storage is already significantly depleted. Lower Basin shortages under the 2007 Guidelines are also insufficient in magnitude to protect critical elevations at Lake Mead, which has induced balancing releases from Lake Powell. These inadequate operations, exposed by numerous years of dry hydrology, have brought the system to the brink of crisis. Operating the system in this manner is not sustainable. In order to assure stability into the future, the Post-2026 Operations must address the imbalance between available supply and demand, considering increased hydrologic variability exacerbated by climate change. The Colorado River supports multiple uses of water. To protect these varied water uses, Reclamation must develop Post-2026 Operations for Lake Powell and Lake Mead that provide the greatest possible degree of operational certainty for water users and managers while providing sufficient flexibility to respond to changing conditions. The Law of the River must be the foundation for the Post-2026 Operations, anchored by the 1922 Colorado River Compact and the 1948 Upper Colorado River Basin Compact ("Compacts") together with the 1944 Treaty with Mexico.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20936	1	P&N - Purpose and Need	1. Purpose and need. The EIS must seek to stabilize the Colorado River System to ensure that the 40 million people who . rely on the Colorado River will have a stable water supply, and, most significant to the Community, allow the United States to continue to meet its obligations to protect water rights held in trust by the United States on behalf of Tribes under Congressionally approved water settlements. Operations of the Colorado River System should be able to respond to varied hydrologic and storage conditions within the system, incorporate flexible tools to protect critical elevations at Lake Powell and Lake Mead, and most importantly, stabilize operations by addressing the imbalance between supply and demand within the Colorado River System in a fair and equitable manner, with all water users having to share fairly in any reductions that might be required.	Gila River Indian Community	Stephen Lewis

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20938	7	P&N - Purpose and Need	Purpose and Need for Post-2026 Operations In order to have a new management system in place when the 2007 Guidelines expire in 2026, the Secretary of Interior has directed Reclamation to develop guidelines for Post-2026 Operations at Lake Powell and Lake Mead. More than 15 years of operational experience illustrate that the 2007 Guidelines are insufficient to properly manage Lake Powell and Lake Mead. Extended periods of dry hydrology and depleted reservoir conditions have highlighted the inadequacy of the 2007 Guidelines to adapt to worsening hydrology and increased uses. Releases from storage under the 2007 Guidelines do not appropriately respond to actual hydrology and storage at the two reservoirs. Under the 2007 Guidelines, shortages in the Lower Basin are triggered at elevations when storage is already significantly depleted. Lower Basin shortages under the 2007 Guidelines are also insufficient in magnitude to protect critical elevations at Lake Mead. These inadequate operations, exposed by numerous years of dry hydrology, have brought the system to the brink of crisis. Operating the system in this manner is not sustainable. To assure stability into the future, the Post-2026 Operations must address the imbalance between available supply and demand. Moreover, the Post-2026 Operations must consider increased hydrologic variability exacerbated by climate change. The Colorado River supports multiple uses of water. To protect these varied uses, Reclamation must develop Post-2026 Operations for Lake Powell and Lake Mead that provide the greatest possible degree of operational certainty for water users and managers while providing sufficient flexibility to respond to changing conditions. The Law of the River must be the foundation for the Post-2026 Operations, anchored by the 1922 Colorado River Compact and the 1948 Upper Colorado River Basin Compact ("Compacts") together with the 1944 Treaty with Mexico.	Colorado River Authority of Utah	Betsy Coleman
20947	1	P&N - Purpose and Need	Clarification about the balance between flexibility and future changes to operations will be important to include as an aspect of the purpose and need of this post-2026 process. The purposes of the 2007 interim guidelines were narrowly focused. The Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (the 2020 7D Review) explains the importance of the interim nature of those operational guidelines and how it was intended to provide the Bureau and stakeholders the opportunity to gain operating experience in a system with highly variable conditions.1 The current conditions, and importantly, our emerging understanding of the range of potential future scenarios make it clear that future water supplies are going to be significantly lower than originally allocated. The interim nature of these strategies are important for providing flexibility for operations, however, goals to significantly reduce consumptive use throughout the basin cannot be an interim measure. Reductions in use need to be baked into the central purpose of this process and carried forward to direct management well into the future.	American Whitewater	Kestrel Kunz
20947	3	P&N - Purpose and Need	New and updated guidelines should include a purpose statement on the need to assess modified infrastructure at Glen Canyon Dam, including building lower outlets to avoid deadpool and analyzing the full decommissioning of Glen Canyon Dam, Hoover Dam, or both. Dam modification or removal would be a long and extensive process that will greatly impact the ability to move water between the upper and lower basins is therefore a necessary purpose to include in updated guidelines. We include more detailed recommendations below for an element that will address this purpose and need.	American Whitewater	Kestrel Kunz
20947	13	P&N - Purpose and Need	Direction on multi-purpose opportunities of the storage and delivery of conserved water should be an additional element of these operational strategies. It should be specific to achieving streamflows that support aquatic habitats and recreational values. This additional element could help to provide mitigation for impacts to in-channel flow.	American Whitewater	Kestrel Kunz
20952	8	P&N - Purpose and Need	The Draft Environmental Impact Statement for the post-2026 Colorado River Reservoir Operational Strategies should clearly identify the underlying purpose and need to which Reclamation is responding in proposing the alternatives. The EPA recommends that the Purpose and Need statement clearly address the storage and delivery of water supplies for irrigation, municipal and other beneficial uses throughout the upper and lower Colorado River Basin. Please also address low runoff conditions and severe reductions in reservoir levels, as well as the inadequacy of current guidelines to adjust to warmer and drier climatic conditions. The EPA recommends that Reclamation prioritize overall demand management as a central objective of the Draft EIS by aligning long-term guidelines, contingent or adaptative management plans, or contract conditions with basin-wide water supply availability	Environmental Protection Agency Region IX	Robin Truitt
20957	2	P&N - Purpose and Need	We are encouraged by the language in the Notice of Intent to create the post-2026 operations saying that, "Future operational guidelines and strategies should incorporate a more holistic approach to Colorado River water management in a way that focuses on the long-term sustainability of both the Basin's population and natural environment..." The Purpose and Need statements in the Environmental Impact Statement (EIS) for development of the new post-2026 operations must include recognition that the CRE in Grand Canyon lies vulnerably between Powell and Mead reservoirs, a vital natural system that must be a forethought and not omitted from any Colorado River planning processes.	Sierra Club Grand Canyon	Alicyn Gitlin
20957	6	P&N - Purpose and Need	Recommendation: Include within the Purpose and Need statements for the post-2026 operations the protection and restoration of the CRE in Grand Canyon as required by the Grand Canyon Protection Act, the Endangered Species Act, and the purpose and significance of Grand Canyon National Park.	Sierra Club Grand Canyon	Alicyn Gitlin

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20981	6	P&N - Purpose and Need	Broader Conditions and Additional Measures The Nation appreciates BOR's acknowledgement that despite higher-than-average runoff conditions for 2023, the Colorado River system is still in the midst of a historic and severe drought. As such, it is imperative that the next management framework be based on realistic expectations, include a broader range of potential conditions, and allow for flexibility in responding to those conditions. The new framework should include additional measures to protect lake levels and power production at Powell, clear rules for allocation of evaporation and system losses in the Lower Basin, and establishment of sytems that allow tribes to realize the value of their water while protecting that water for future development. In addition to facilitating use of water for humans, the new management structure should also support regular river restoration activities, environmental projects, and measures to protect the river as a living being.	Jicarilla Apache Nation	Edward Velarde
20982	7	P&N - Purpose and Need	* Post-2026 operational guidelines and strategies must recognize the needs of all water users in southwest Colorado, including the Southern Ute Indian Tribe and the Ute Mountain Ute Tribe, and support efforts to put Colorado's unused apportionment to beneficial use within Colorado by providing funds to develop the necessary infrastructure.	Southwestern Water Conservation District	Steve Wolff
21094	3	P&N - Purpose and Need	Reclamation acknowledged that several actions have been taken, since 2021, to protect critical infrastructure in response to declining reservoir elevations and the severe drought conditions from 2020 to 2022. Each of those actions were a band-aid because the 2007 Interim Guidelines were unable to address the severe drought conditions. In addition, there is an overuse of water. The amount of water being used is more than the amount of water produced each year by Mother Nature. The Post-2026 Guidelines need to address the deficiencies of the 2007 Interim Guidelines and the overuse of water, while allowing for development of water by tribes in the Basin.	Southern Ute Indian Tribe	Melvin Baker
21302	1	P&N - Purpose and Need	The past two decades have demonstrated that the hydrology of the Colorado River is both less stable and less predictable than was believed when the 2007 Guidelines were developed. Climate impacts are increasingly evident and growing in every part of the Basin, and as a result our previous management strategy-focusing primariliy on the allocation of water from and balance of water between Lakes Mead and Powell-will not be adequate to address the current challenges and avoid the risk of catastrophic failure in the system. To that end, we recommend that the statement of purpose and need originally identified in the 2007 Guidelines should be modified and broadened to include three additional elements: * Providing U.S. entitlement holders and subcontractors with adequate notice of changes in water availability based on clearly defined management rules that provide meaningful opportunity for adaptation, recognizing that unexpected disruptions in water supply for municipal providers can threaten human health and safety. * Implementing a precautionary principle in decision-making that focuses on rebuilding storage buffers and maintaining the long-term resilience of the Colorado River system. * Improving water management by managing the Colorado River based on whole system conditions and developing coordinated solutions across natural and built infrastructure.The past two decades have demonstrated that the hydrology of the Colorado River is both less stable and less predictable than was believed when the 2007 Guidelines were developed. Climate impacts are increasingly evident and growing in every part of the Basin, and as a result our previous management strategy-focusing primariiy on the allocation of water from and balance of water between Lakes Mead and Powell-will not be adequate to address the current challenges and avoid the risk of catastrophic failure in the system. To that end, we recommend that the statement of purpose and need originally identified in the 2007 Guidelines should be modified and broadened to include three additional elements: * Providing U.S. entitlement holders and subcontractors with adequate notice of changes in water availability based on clearly defined management rules that provide meaningful opportunity for adaptation, recognizing that unexpected disruptions in water supply for municipal providers can threaten human health and safety. * Implementing a precautionary principle in decision-making that focuses on rebuilding storage buffers and maintaining the long-term resilience of the Colorado River system. * Improving water management by managing the Colorado River based on whole system conditions and developing coordinated solutions across natural and built infrastructure.	City of Phoenix	Cynthia Campbell
Form 7	-	PI - Public and Stakeholder Involvement	Provide impacted people, conservation groups, and other stakeholders the opportunity to meaningfully contribute ideas for sustaining the river.	Western Resource Advocates	
17202	6	PI - Public and Stakeholder Involvement	Consistent with recommendations made during the pre-scoping period in regard to an integrated, disciplinary team, Reclamation should also consider assembling such a team to evaluate the impacts on the reliability of the electrical grid associated with reduced or bypassed water releases. The team should include a broad range of industry experts, including WAPA, reliability organizations, grid operators and power suppliers.	CREDA Colorado River Energy Distributers Association	Leslie James
20417	19	PI - Public and Stakeholder Involvement	Drought Operations in 2022 also served as an example of good outreach by BOR to stakeholders, in advance of the action, to allow input to refine the approach.	Western Resource Advocates	Bart Miller
20465	9	PI - Public and Stakeholder Involvement	There are opportunities to expand partnerships with other federal agencies and programs, such as the U.S. Department of Agriculture's salinity control program activities, to drive increased conservation.	California Department of Water Resources	Karla Nemeth

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20471	1	PI - Public and Stakeholder Involvement	A. The Bureau must ensure that its administrative process is equitable and transparent. Stakeholders have not been represented equally in discussions over the use of Colorado River water. Some groups have the ear of sympathetic government officials, while others struggle to receive an audience. Some with low- priority water rights are invited into closed-door negotiations, while others are excluded even as their senior rights are debated. And some are asked to sacrifice water used for the benefit of all, while others store vast quantities of under-utilized water. It can be difficult for state representatives to properly represent the disparate interests of all users within their States. The Bureau must ensure full input from major water users with compelling and federally protected interests, such as agricultural and military users in the Yuma area. When stakeholders cannot participate in important discussions, they must be apprised of what discussions have occurred, what policies have been developed, and what actions will be taken-- such that all entities have notice and an opportunity to be heard. At the same time, discussions among appropriate groups of stakeholders are an important avenue to finding sustainable solutions for managing the River's limited resources. Indeed, the best solutions--or key parts of them--may not be within the Bureau's power to adopt through its administrative processes. These comments necessarily focus on the Bureau's process and the limits of its authority. But the Districts are committed to cooperating with other parties and continuing to explore solutions that lie outside the Bureau's control. Clear messages from the Bureau are an essential foundation for those broader discussions because they offer parties a shared starting point from which to negotiate and develop better approaches.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20489	50	PI - Public and Stakeholder Involvement	iv. Demonstrate the Bureau is listening and that stakeholders are being heard. Not surprisingly, Colorado River stakeholders want more than to be informed. They want to know they are being heard and understood. Meaningful engagement for the post-2026 NEPA process will require both informing and listening to the Colorado River community, by finding ways to account for: a. Timing - Providing information, possible considerations, obstacles, etc. as early as possible allows the public time to absorb, consider, and provide useful information going forward. The less time provided, the more likely the public will be forced to simply react on the fly or conclude they have been left out of the process. To this end, it will be important to maintain the mechanisms for keeping the interested public informed of progress and developments from the NEPA effort in a timely manner. This includes things like: (1) updating the dedicated website to include all relevant information, key contacts, and calendar for impactful communication and feedback opportunities; (2) a mechanism for broadcasting important updates and notices of meetings, conferences, and webinars (e.g., through social media among other sources); (3) consultations, public meetings, and webinars to provide substantive updates. b. Communication - Communicating information, developments, and possible responses as they arise goes a long way to promoting transparency, which helps combat cynical or negative assumptions as to what happened and why. To help this process, we recommend designating points of contact for specific groups and individuals to directly discuss possible content, outcomes, and changes to the NEPA analysis as it progresses. This may be particularly important as the community works to identify vulnerabilities and solutions relevant to a robust decision-making process, which should take advantage wherever possible of local stakeholder knowledge to better inform the understanding of risks and issues that can result from conditions that may develop in the face of increasing uncertainty. It will require scheduling outreach at relevant, timely intervals to provide a reasonable opportunity for gaining an understanding of the NEPA analysis. It will also require making Bureau staff readily available to interested stakeholders (and not just one group or water user sector) to encourage iterative discussions and feedback. c. Responsiveness - It will not be enough to provide information, explain the situation and receive feedback. Responding to input and/or demonstrating that the audience has been heard is integral to building an inclusive process. Points of contact to discuss feedback and relay circumstances as set forth in (b) above could advance the responsiveness requirement as well.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20608	8	PI - Public and Stakeholder Involvement	6. Include design of transparent stakeholder- and Tribal Nation-engaged decision-making processes for implementing actions according to the guidelines and strategies under the various alternatives.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20700	48	PI - Public and Stakeholder Involvement	The Trust appreciate Reclamation's efforts to conduct a series of actions simultaneously to address the challenges the basin faces due to low runoff and reservoir elevations. These actions--from the near-term revisions to the 2007 Guidelines to the infrastructure review and assessment of Glen Canyon and Hoover Dams--are all vital to addressing the immediate crisis as well as planning for alternatives and scenarios to address foreseeable and untenable future problems. Given the breadth of these actions, it would be helpful if Reclamation was more transparent, communicative, and coordinated in updating the public on the status of those studies. For example, we understand that an evaporation and seepage study is underway, but it is unclear when it will be released and how it will inform (both related to timing and substance) the development of the post-2026 guidelines. The process to develop the post-2026 guidelines can only be enhanced and supported by these other actions and studies. We encourage Reclamation to develop a central location to provide such status updates and information for the public and stakeholders to access.	Grand Canyon Trust	Jen Pelz

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20738	2	PI - Public and Stakeholder Involvement	We also appreciate Reclamation making available technical infonnation and tools to facilitate our ability to engage effectively in this process. The Integrated Technical Education Workgroup is an extremely valuable and constructive forum, and we look forward to the release of the shortage allocation tool this fall that Reclamation has informed us is under development. These efforts - and your leadership - will remain vital throughout the development of the post- 2026 EIS and the implementation of the next management framework to ensure that good words and positive first steps toward genuine tribal inclusion remain matched with action.	Quechan Indian Tribe	Jordan Joaquin
20817	1	PI - Public and Stakeholder Involvement	The Upper Division States are committed to working with Reclamation, including through this NEPA process, to develop the new guidelines for Post-2026 Operations. In addition, the Upper Division States anticipate working with the Lower Division States to develop an alternative for consideration and evaluation, as the Basin States did for the NEPA process for the 2007 Guidelines.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	18	PI - Public and Stakeholder Involvement	The Upper Division States will also continue to engage with water users, non-governmental organizations, and other stakeholders that are interested in the Post-2026 Operations of Lake Powell and Lake Mead.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	20	PI - Public and Stakeholder Involvement	We urge the Bureau to embrace the following suggestions for the upcoming NEPA process: 1. Provide more in-person and virtual meetings at multiple locations in each basin state of USA and Mexico to ensure a robust review of the DEIS, FEIS and ROD..	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20930	5	PI - Public and Stakeholder Involvement	C. Key information is missing from the Notice. The Notice does not include key information usually included in a Notice such as a preliminmy description of the proposed action, the purpose and need for the proposed action, the alternatives likely to be considered, and a brief summary of anticipated impacts. Hence, our ability to provide responsive comments at this time is constrained by the lack of information and we expressly reserve all rights to comment on specific aspects of the DEIS as it becomes publicly available.	Colorado River Indian Tribes	Rebecca Loudbear
20932	15	PI - Public and Stakeholder Involvement	The Upper Division States will also continue to engage with water users, non-governmental organizations, and other stakeholders that are interested in the Post-2026 Operations of Lake Powell and Lake Mead.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20963	7	PI - Public and Stakeholder Involvement	Develop a sustained public engagement strategy that takes full advantage of Web- based and social media platforms (e.g., webinars, virtual/hybrid/recorded meetings, data hubs, online dashboards, and story maps) to update and educate the public on the process.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	18	PI - Public and Stakeholder Involvement	In a constrained water future, communication and coordination between decision makers, stakeholders and the public will be critical. Creating and supporting forums that allow for quick and accessible levels of communication will be essential to maintaining a knowledgeable and supportive public.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20972	2	PI - Public and Stakeholder Involvement	Further, when stakeholders are not able to participate in or are left out of important discussions, they must be made aware of what discussions have occurred, what policies have been developed, and what actions will be taken-such that all entities have notice and an opportunity to be heard.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	3	PI - Public and Stakeholder Involvement	The Bureau must also recognize that state representatives do not adequately or properly represent the unique interests of all users within their states and should ensure full input from major water users with compelling and federally protected interests, such as agricultural users in the Yuma area.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
21081	1	PI - Public and Stakeholder Involvement	To have the most effective and equitable outcome of reducing water use in the Colorado River Basin, all water users and interests must be consulted via localized scoping meetings.	Dolores River Boating Advocates	Rica Fulton

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21156	1	PI - Public and Stakeholder Involvement	I wanted to advise you that for persons who did not attend the webinars, it is very difficult to determine how to provide feedback for consideration. In May & June the news media ran stories about the subject, and referred to links in their websites for the public to provide comments - I could not find any such links, and received no response when I requested the links from the news channels. If you have not received the public comment which you desired, you may want to make another effort to have the news media distribute information about how the public can provide you with their comments.		Neil Fischnaller
11572	1	POLICYGOV - Policy and governance	I believe the Colorado River compact should be renegotiated in order to protect the environment and fulfill our treaty obligations to Mexico		Robert Wells
12848	4	POLICYGOV - Policy and governance	The compact needs to be revised to reflect actual conditions in the river under worst case conditions. Continued stream flow reduction is anticipated as climate change heats up. It is imperative that new rules on the Colorado River reflect this reality. In addition, tribal water rights need to be finalized and factored into these equations.		Lisa Buchanan
14704	2	POLICYGOV - Policy and governance	We also need to have tighter laws protecting the Colo River & the South Platt River from having forever poisonous chemicals, like the ones dumped recently by Sunshade into the river system in quantities so high it became a news report. For heaven's sake! The birds & animals use that water. And so do humans! We are switching to electric cars & solar as well as wind power but we still let companies dump massive amounts of volatile substance that the scientists call "forever poison" into the water we need to live? How does that make sense? We're talking about protecting the Colorado River and we need to be talking about ALL Rivers & ALL water. We don't need brighter colors on patio furniture & sunshades as much as we need to have water & wildlife.		Susanna L. Wells
17241	6	POLICYGOV - Policy and governance	5. While there will be limits to the scope of Reclamation's post-2026 Colorado River guidelines, these guidelines should anticipate parallel processes such as extension of the Upper Basin Drought Response Operations Agreement, the successor to Minute 323 (the U.S.--Mexico Colorado River agreement), durable water conservation, investment in restoration and protection of watershed health, and others. If designed in tandem, the post-2026 Colorado River guidelines and these parallel processes could provide greater water supply reliability for human uses and for nature.	National Audubon Society	Jennifer Pitt
17241	23	POLICYGOV - Policy and governance	Other resource impact analyses should include (but not be limited to): - National Parks, National Wildlife Refuges, state parks, and other lands with protective designations;	National Audubon Society	Jennifer Pitt
17241	45	POLICYGOV - Policy and governance	Consider how management options will interact with other responses to conditions on the Colorado River - Congress has made unprecedented appropriations in 2021 and 2022 to address Colorado River and other Western river conditions (i.e., through the Bipartisan Infrastructure Law and the Inflation Reduction Act). While we do not yet know the specifics of how these dollars will be used, the appropriations do come with authorizations and guidance, and some investment details will be known as Reclamation evaluates future management options. Reclamation's analysis would benefit from consideration of these investments (current and future), and Reclamation's post-2026 management decision should aspire to complement them.	National Audubon Society	Jennifer Pitt
20417	29	POLICYGOV - Policy and governance	i. Connection and consideration of related parallel processes WRA also believes that Reclamation should connect the development of post-2026 operations to parallel planning processes, so that they are taken into account within the scope of the NEPA process. Several current multi-state agreements are set to expire at the end of 2025 while others are ongoing and require a resolution sooner rather than later. Their re-issuance/resolution will be critical to the "package" of management strategies for the Colorado River and thus they should be clearly connected to the post-2026 operations and associated NEPA analysis. In this regard, Reclamation should consider: (1) Any programs developed/implemented to address "critical levels" at Powell and Mead. Drought Operations and timing such releases to benefit streams. (2) Progress towards a robust demand management program in the Upper Basin, including the Demand Management Storage Agreement, with consideration of how that program may be designed to benefit environmental flows in the Upper Basin. (3) Continued progress towards providing all tribes with clean water. (4) Continued progress with Mexico on Minutes to the 1944 Water Treaty and mitigating ecological impacts in the Colorado River Delta. (5) Progress towards efforts to address declining Salton Sea levels. (6) Continued coordination with relevant federal agencies to identify how post-2026 guidelines and any associated operations (both long-term and short-term/emergency) can be designed to benefit Upper Basin and Lower Basin environmental and recreational resources.	Western Resource Advocates	Bart Miller

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20438	12	POLICYGOV - Policy and governance	6. Reduce the threat of litigation.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	18	POLICYGOV - Policy and governance	6. Coordinate operational and management decisions with separate but parallel efforts to build resiliencies that are needed to help the Basin survive and thrive going forward; and	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	34	POLICYGOV - Policy and governance	7. Opportunities to leverage parallel processes (current/future) to help build resilience and mitigate the effects of drought in the Basin.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20469	1	POLICYGOV - Policy and governance	Powell and Mead. Our comments are grounded in the mandates of the Grand Canyon Protection Act of 1992 which states, "The Secretary shall operate Glen Canyon Dam... in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use." (Section 1802, GCPA). Indeed, GCRG and the broader public view the Colorado River through Grand Canyon National Park, not as a pipeline between two reservoirs, but as a sacred place and living river with complex and interrelated resources and associated values that must be protected in perpetuity. Furthermore, the legal obligations of the Grand Canyon Protection Act (GCPA), the Endangered Species Act (ESA), the National Park Service Organic Act, and National Historic Preservation Act (NHPA) underpin the Long Term Experimental and Management Plan (LTEMP) EIS, that outlines resource goals and objectives, management actions, and experimental options for adaptively managing Glen Canyon Dam over a 20 year timeframe. It is within this overarching context that the Bureau of Reclamation, as a federal agency, must move forward towards developing sustainable, holistic, and environmentally responsible post-2026 Operational Guidelines and Strategies for Lakes Powell and Mead that also preserve the values of the Colorado River through Grand Canyon	Grand Canyon River Guides, Inc.	Lynn Hamilton
20469	12	POLICYGOV - Policy and governance	3. At what point will flow levels through Grand Canyon negatively impact the Colorado River Management Plan (CRMP) which is the visitor use plan that balances recreational opportunities with conserving park resources?	Grand Canyon River Guides, Inc.	Lynn Hamilton
20471	5	POLICYGOV - Policy and governance	C. In preparing an environmental impact statement (EIS) for post-2026 operations, the Bureau must comply with the Administrative Procedure Act ("APA"), 5 U.S.C. SSSS 701 et seq. The Bureau may not unlawfully withhold or unreasonably delay mandatory acts; cannot act in a manner contrary to law; must not be arbitrary or capricious in making discretionary decisions; and must have substantial evidence for any fact-based decisions. Id. SS 706. The Bureau must also ensure that its processes satisfy the National Environmental Policy Act ("NEPA"), 42 U.S.C. SS 4321 et seq. NEPA requires the Bureau to analyze the direct and indirect effects of a decision of this magnitude in an EIS with reasonable specificity. See 40 C.F.R. SS 1508.1(g) (discussing direct and indirect effects). The Ninth Circuit has repeatedly insisted that "general statements" about future impacts do not satisfy NEPA. Or. Nat. Res. Council Fund v. Brong, 492 F.3d 1120, 1134 (9th Cir. 2007). Thus, an EIS for an oil development project that failed to analyze the carbon consequences of increasing foreign oil consumption by depressing oil prices did not satisfy NEPA. Ctr. for Biological Diversity v. Bernhardt, 982 F.3d 723, 740 (9th Cir. 2020). The governing regulations specifically require that changes to land use be considered among other indirect effects: "Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. SS 1508.1(g)(2). Thus, any EIS concerning restrictions on Colorado River water usage must analyze environmental impacts at the level of the specific users denied water. Under present circumstances, it will not suffice to note, as the agency erroneously did in Center for Biological Diversity, that usage of a resource might generally increase or decrease. 982 F.3d at 722. Rather, the agency must determine the impacts of that increase or decrease, including how people who depend directly or indirectly on water from the Colorado River will foreseeably substitute for its loss--especially where changes in land use will result. That starts with clearly identifying where, precisely, reductions in water usage will occur. The Bureau must be candid about these reductions to allow the public and the Bureau itself to meaningfully evaluate their impacts. Such specificity is critical because those impacts vary across different users, both in Arizona and across the Lower Basin. The environmental impacts of sustaining or ending Yuma's high-efficiency agricultural production differ markedly from, for example, the environmental impacts of altering water usage in high-carbon-usage suburbs or water-inefficient agriculture elsewhere in the Basin. The DSEIS failed to analyze these differences, hiding behind averages, broad-brush assumptions, and a refusal to identify how water would actually be distributed under any operational plan. The Bureau's post-2026 analysis must avoid those errors.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20481	6	POLICYGOV - Policy and governance	In particular, the Post-2026 EIS should not revisit the Long-Term Experimental Management Plan or records of decisions for Upper Basin reservoirs above Lake Powell.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20486	6	POLICYGOV - Policy and governance	As was true with the 2007 Guidelines, the 1922 Colorado River Compact, the 1948 Upper Colorado River Basin Compact, and the 1944 Treaty with Mexico must be the foundation for any Post-2026 Operations. They provide durability, certainty, and stability in managing the Colorado River System and infrastructure. They also provide sufficient flexibility to address current and future risks. These foundational elements must be honored which can be achieved through the development of a consensus seven-state recommendation that can be incorporated into an adopted preferred alternative. Wyoming remains committed to working with the other Basin States, Tribes, water users, and other stakeholders to achieve appropriate consensus.	State of Wyoming	Brandon Gebhart
20486	9	POLICYGOV - Policy and governance	Post-2026 Operations cannot, in any way, impair or impede the right of the Upper Basin to consumptively use water available to that Basin under the Colorado River Compact. Nor can they address intrastate storage or intrastate distribution of water in the Upper Basin, including storage and distribution associated with participating projects of the Colorado River Storage Project Act of 1956. Additionally, Post-2026 Operations cannot affect any right or obligation of any Upper Division state under the Colorado River Compact. Wyoming retains exclusive authority over the control, appropriation, use, and distribution of water within its borders.	State of Wyoming	Brandon Gebhart

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20489	7	POLICYGOV - Policy and governance	4. The post-2026 Guidelines must work in concert with parallel processes to benefit the Basin. The Guidelines will not be the sole answer to the challenges afflicting the Colorado River Basin. Parallel activities will also be critical to the Basin's overall stability and sustainability. The Bureau of Reclamation's (Bureau) post-2026 process should be developed with an eye toward anticipating parallel processes such as extension of elements of the Drought Contingency Plan, the successor to Minute 323, durable conservation programs, investment in restoration and protection of watershed health, and other tools to provide greater water supply reliability for human uses and for nature.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	33	POLICYGOV - Policy and governance	Since the post-2026 management strategies and operations cannot be the sole answer to all challenges afflicting the Colorado River Basin, parallel activities, in addition to those contemplated by the Bureau's NEPA analyses, will be critical to the Basin's overall stability and sustainability. The scope of the alternatives analyses should, therefore, anticipate tools and agreements that will be necessary to effectuate essential and foreseeable parallel processes to ensure the longevity of workable operations going forward.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	38	POLICYGOV - Policy and governance	f. Satellite agreements linked to Colorado River management -- Agreements that are separate from but linked to the Interim Guidelines will influence strategies and operations in the post-2026 world. To the extent such agreements are not directly part of the post-2026 Guidelines, they should still be identified and analyzed to the extent they are critical to the Guidelines' operational success.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	3	POLICYGOV - Policy and governance	Environmental and ecosystem considerations related to natural and cultural resources, and visitor experience in accordance with the Grand Canyon Protection Act, the Endangered Species Act, National Historic Preservation Act, and other environmental laws, must be analyzed and disclosed for all impacted river segments and should be integral to developing operational rules, strategies, and mitigations.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20496	5	POLICYGOV - Policy and governance	It doesnt help that we started out in the red. When the Colorado River Compact was drawn up in 1922 it overallocated Colorado River Water based on inflated flow levels from an abnormally wet period. Drought years were not taken into consideration, despite concurrent studies of tree rings from the southwest that warned of stretches of extreme drought throughout the region over the course of thousands of years. The compact at the time did not include the upper basin, nor did it factor water for tribes and Mexico who relied on and resided along the rivers course. Over 100 years later, the same law of the river is being applied to a river that has shrunk by 20% during the recent 23-year drought and with a population that continues to grow exponentially. This basic accounting problem is pushing toward bankruptcy.		Morgan Sjogren
20608	5	POLICYGOV - Policy and governance	Similarly consider protected resources and associated goals under the Grand Canyon Protection Act of 1992, the Colorado River Management Plan for Grand Canyon National Park, the LTEMP ROD, the administrative Colorado River protections of suitability for Wild and Scenic Rivers and Proposed Potential Wilderness within the National Park, and ESA listed species recovery plans and goals.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens

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20700	19	POLICYGOV - Policy and governance	It is our understanding that certain provisions of the LTEMP may be reviewed and an environmental impact statement prepared in 2024 related narrowly to adjusting the sediment accounting window for triggering high flow experiments and to consider operations of Glen Canyon Dam to prevent non-native fish species from passing through the dam and establishing in the Grand Canyon to the detriment of native fish. While we appreciate the effort to move forward with these adjustments to LTEMP, a more comprehensive review of LTEMP seems warranted given the development of the post-2026 guidelines. The decisions regarding the framework for the post-2026 guidelines are too important to the future of the Grand Canyon not to integrate the discussion and massive amounts of science that have been generated over the past decade through LTEMP and AMWG into parallel if not simultaneous discussions. It is important to integrate discussions about how operations under the new guidelines can serve not just the interests of water users downstream or the generation of power, but also create the most flexibilities and opportunities for protecting one of the most recognized and valuable cultural landscapes in the world.	Grand Canyon Trust	Jen Pelz
20700	40	POLICYGOV - Policy and governance	A suggested vehicle for future agreements around how to allocate evaporation and other system losses include the negotiation of a Lower Basin Compact to address unresolved issues from the 1922 Colorado River Basin Compact. Id. at 18. Allocation of evaporation losses is just one of several issues left unsettled over the past 100 years that would benefit from forward looking and proactive agreements by the Lower Basin states. Fleck and Kuhn suggest that without such a compact, critical allocation and management questions such as the definition of consumptive use, the status and meaning of article III(b) of the 1922 Compact, and the assessment of evaporation and system losses remain unanswered and subject to dispute.	Grand Canyon Trust	Jen Pelz
20700	49	POLICYGOV - Policy and governance	A. ALIGN/INTEGRATE OTHER ACTIONS BY RECLAMATION. Reclamation must coordinate the alignment of other actions it is undertaking in the basin with the development of the post-2026 guidelines. In August of 2022, the Department of the Interior announce "a number of administrative actions" it intends to take in the Basin32 in addition to the development of the post-2026 guidelines, including the following: * Prepare Draft Supplemental Environmental Impact Statement for Near-Term Colorado River Operations to revise 2007 Interim Guidelines--including "actions needed to authorize a reduction of Glen Canyon Dam releases below 7 million acre-feet per year, if needed, to protect critical infrastructure at Glen Canyon Dam" and "actions needed to further define reservoir operations at Lake Mead, including shortage operations at elevations below 1,025 feet to reduce the risk of Lake Mead declining to critically low elevations." * Prepare Studies of River Outlet works at Glen Canyon Dam--including "accelerate ongoing maintenance actions and studies to determine and enhance projected reliability of the use of the river outlet works, commonly referred to as the bypass tubes, at Glen Canyon Dam for extended periods." * Investigate Physical Modifications at Glen Canyon Dam--including "support technical studies to ascertain if physical modifications can be made to Glen Canyon Dam to allow water to be pumped or released from below currently identified critical and dead pool elevations." * Drought Response Operation Agreement--including "work with the Basin states, Basin Tribes, stakeholders and partners to be prepared to implement additional substantial releases from Upper Basin Reservoirs to help enhance reservoir elevations at Lake Powell under the Drought Contingency Plan's Drought Response Operations Agreement." * Evaporation and System Loss Study--including "prioritize and prepare for additional administrative initiatives that would ensure maximum efficient and beneficial use of urban and agricultural water, and address evaporation, seepage and other system losses in the Lower Basin." * Investigate Physical Modification at Hoover Dam--including "support technical studies to ascertain if physical modifications can be made to Hoover Dam to allow water to be pumped/released from elevations below currently identified dead pool elevations." In addition to these actions announced last year, additional investigations or efforts on the horizon include: * LTEMP Review and Amendment--Evaluate alternatives for operating Glen Canyon Dam to prevent passage and establishment of non-native fish species in the Grand Canyon and to review a change to the sediment accounting window for determining when to conduct high flow experiments in the canyon. * Feasibility Study of Fish Barrier in Lake Powell--Evaluate feasibility of installing fish barrier in Lake Powell to prevent the passage of non-native species into the Grand Canyon. * Quantify and settle tribal water rights--Negotiate and implement settlements of unfulfilled tribal water rights. While we understand that every issue or investigation cannot fall within the scope of the post- 2026 guidelines, at a very minimum, all the actions listed above should be timed and coordinated with the development of the post-2026 guidelines. It would also be incredibly helpful to have a little more insight into that status of these processes and how Reclamation sees them as integrated with or separate from the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20738	14	POLICYGOV - Policy and governance	The post-2026 EIS should analyze not just the scope of potential cuts but also poteutial mitigation strategies - including those that might require authorities Reclamation does not currently possess - so the need for supplemental NEPA processes can be minimized and so Basin stakeholders can work at the congressional level to ensure that this process is fully integrated with the other parallel processes that must move in tandem (such as negotiations between the United States and Mexico and Multi-Species Conservation Plan reconsultation) to craft a resilient and sustainable future for the Basin.	Quechan Indian Tribe	Jordan Joaquin

Letter Number	Letter Comment	Comment Code	Comment Text	Organization / Affiliation	Sender Name
20817	3	POLICYGOV - Policy and governance	3. Not interfere with the rights of any state to administer and regulate water within its boundaries.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	20	POLICYGOV - Policy and governance	Other issues, such as unresolved Tribal water rights, endangered species, and other environmental issues and concerns, should be addressed through other established programs, processes, and frameworks.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	41	POLICYGOV - Policy and governance	The Energy Security Act of 1980: Response from the National Academy of Sciences, and by Roger R. Revelle and colleagues from The Scripps Institute of Oceanography. Reclamation can no longer ignore the harsh facts climate change imposes -- nor can it ignore the effect of industries outside the purview of its regulatory capacity. In the early 1980s there were concerns about the energy policy discussions that were underway, and specifically about developing the reserves of oil shale and oil sands in the Upper Basin states of the CRB: specifically in southwest Wyoming, northeast Utah and northwest Colorado. The former science advisor to Interior Secretary Stewart Udall (1961 to 1969), Roger Revelle, PhD, worried about the massive domestic energy source unnecessarily accelerating the loading of greenhouse gases into the atmosphere by the mass production of a low-value fossil fuel that requires excessive amounts of water and energy to develop, process, and distribute. Revelle and his colleagues had determined by 1956 that the ocean had already reached its limit at absorbing carbon molecules from the atmosphere. This assessment incited the installation of the carbon dioxide monitoring station at Mount Mauna Loa, Hawaii in 1958. This data documents the correlation between greenhouse gas emissions and the generation of excessive heat inputs that have subsequently disrupted the circulation patterns of ocean and atmosphere.15	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	2	POLICYGOV - Policy and governance	The EIS should include a reasonable range of alternatives in conformance with 40 CFR SS 1502.14 and 40 CFR SS 1508.1. In addition, all alternatives considered, including consensus based alternatives, must comply with existing laws governing the use of Colorado River water. Principal among these laws is the Colorado River Compact of 1922, which provides: The States of the Upper Division will not cause the flow of the river at Lee Ferry to be depleted below an aggregate of 75,000,000 acre-feet for any period of ten consecutive years reckoned in continuing progressive series beginning with the first day of October next succeeding the ratification of this compact.		Craig Morgan; Mike Abatti; James Abatti
20904	7	POLICYGOV - Policy and governance	It is clear that the operations at Glen Canyon Dam largely dictated reservoir operations in the prior 2007 Interim Guidelines. Yet, under the Colorado River Compact of 1922, municipal and agricultural use have preference. The 1922 Compact states that "water of the Colorado River System may be impounded and used for the generation of electrical power, but such impounding and use shall be subservient to the use and consumption of such water for agricultural and domestic purposes and shall not interfere with or prevent use for such dominant purposes."		Craig Morgan; Mike Abatti; James Abatti
20919	2	POLICYGOV - Policy and governance	Framework The Post-2026 Operations should reside in a framework consistent with a reasonable interpretation of the Law of the River and other applicable provisions of federal law, taking into account the impacts of extended drought and climate change on water users and critical infrastructure. Article III(d) of the 1922 Colorado River Compact (Compact) is designed to ensure that the Lower Basin receives the supply of 7.5 million acre-feet (maf) per year apportioned to it under Article III(a) of the Compact. Article III(d) states: The States of the Upper Division will not cause the flow of the river at Lee Ferry to be depleted below an aggregate of 75,000,000 acre-feet for any period of ten consecutive years reckoned in continuing progressive series beginning with the first day of October next succeeding the ratification of this compact.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	5	POLICYGOV - Policy and governance	In consideration of climate impacts, the Post-2026 Operations must address compliance with the Colorado River Compact and the Decree, and the imbalance between supply and demand. The burden of addressing those impacts should be equitably shared throughout the basin.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20923	1	POLICYGOV - Policy and governance	We believe that, while Reclamation must institute bold and meaningful changes, those changes can and should implemented consistent with the 1922 Colorado River Compact, the 1944 bi- national treaty with Mexico, the 1948 Upper Basin Compact, and the other foundational elements of the Law of the River. Please consider the following principles and concepts that we believe should guide Reclamation's review and adoption of post-2026 operations	Colorado River District	Peter Fleming

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20923	2	POLICYGOV - Policy and governance	Reclamation's review must not be limited to incremental changes to existing policies and operating guidelines. The temporary measures adopted in recent years to address declining water elevation levels at Lakes Powell and Mead have been incremental and stop-gap in nature. Reclamation's adoption of new guidelines must not be constrained to "tweaks" of existing guidelines and should not be limited to long-term adoption of the moderate measures contemplated by Reclamation's anticipated Supplemental EIS for Near-Term Operations.	Colorado River District	Peter Fleming
20925	3	POLICYGOV - Policy and governance	The new set of guidelines must continue to comply with the 1922 Colorado River Compact and the priority system that is foundational to the Law of the River. Further, the guidelines for minimum releases during times of shortages to be established by the post-2026 operating guidelines must also abide by the Law of the River.	San Diego County Water Authority	Dan Denham
20927	1	POLICYGOV - Policy and governance	The EIS operational scenarios should be based upon the Law of the River, 1922 Colorado River Compact, the 1948 Upper Colorado River Basin Compact, and the 1944 Treaty with Mexico. These foundational documents provide durability, certainty, and stability in managing the Colorado River System and Infrastructure. The scope of this contemplated federal action must be consistent with federal law and existing federal authority.	Front Range Water Council	Alan Salazar
20930	4	POLICYGOV - Policy and governance	A. Post- 2026 Operational Guidelines should be separate from the Supplemental Environmental Impact Statement for Near-term Colorado River Operations process ("SEIS"). We believe the Post-2026 Operational Guidelines and the SEIS are two distinct actions and they must be kept separate. Nonetheless, should Reclamation decide it will use information and analysis from the SEIS in the Post-2026 Operational Guidelines process, Reclamation must share the States' proposal and its environmental analysis of that proposal before proceeding too far with the environmental review for the Post-2026 Operational Guidelines. We are concerned the SEIS process and final decision based thereon will directly impact the environment and operational water levels that will be the baseline for the Post-2026 Operational Guidelines. Simply put, if Reclamation is seeking to incorporate any information from the SEIS process for Near-term Operations, all information regarding the States' proposals must be publicly released prior to the selection of alternatives to be analyzed in the DEIS for the Post-2026 Operational Guidelines.	Colorado River Indian Tribes	Rebecca Loudbear
20945	5	POLICYGOV - Policy and governance	5. Avoid uncertain outcomes from litigation by recognizing the Law of the River, anchored by the 1922 Colorado River Compact and the 1948 Upper Colorado River Basin Compact ("Compacts") together with the 1944 Treaty with Mexico, as the foundation for any new guidelines and strategies for Post-2026 Operations. These foundational components provide legal certainty regarding management of the Colorado River System and its infrastructure and allow for collaboration and consensus.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	6	POLICYGOV - Policy and governance	4. Do not interfere with the right of any state to administer and distribute all the waters within its boundaries.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	16	POLICYGOV - Policy and governance	Moreover, to understand and compare alternatives for guidelines for Post-2026 Operations, it is imperative that Reclamation issue the Lower Basin Consumptive Uses and Losses Report 2006-2022 at the earliest opportunity.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	17	POLICYGOV - Policy and governance	However, a detailed framework or rulemaking for voluntary water conservation measures in the Lower Basin, species conservation programs, or other related matters must be addressed in separate but parallel proceedings.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20950	3	POLICYGOV - Policy and governance	4. The post-2026 Guidelines must work in concert with parallel strategies that benefit the Basin: The Guidelines will not be the sole answer to challenges afflicting the Colorado River Basin. Reinforcing and parallel activities will be critical to support the Basin's overall stability. The Bureau's post-2026 process should anticipate and reinforce parallel processes led by states, agencies, NGOs, Tribes, and others.	Gadsden Company, Sonoran Wines, Cruz Farm, Greater Area Kingman Chamber of Commerce, Bullhead City Chamber of Commerce; Greater Flagstaff Area Chamber of Commerce	Harold Thomas

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20952	29	POLICYGOV - Policy and governance	Periodic high flows reduce adverse impacts and are critical to maintaining the health and function of the ecosystem of the Colorado River. These high flows mimic the natural floods and geomorphic processes that are blocked by the dams, improve both in-stream and riparian habitat for aquatic and terrestrial wildlife, reduce invasive plant populations, and increase recreational opportunities along the Colorado River through Grand Canyon National Park. The existing Long Term Experimental and Management Plan (LTEMP)(2016) provides a framework for adaptively managing Glen Canyon Dam operations through 2036 consistent with the Grand Canyon Protection Act of 1992 (GCPA) and other provisions of applicable federal law. Within the area affected by Lake Powell's operations, the LTEMP sets out options between non-flow, minimum flow thresholds, and high flow experimental and management actions that meet the GCPA's requirements and minimize impacts on resources within the Colorado River ecosystem, including those of importance to tribes. The EPA recommends the analysis of alternatives that would allocate sufficient water in Lake Powell to continue LTEMP releases and High- Flow Events.	Environmental Protection Agency Region IX	Robin Truitt
20957	1	POLICYGOV - Policy and governance	The post-2026 operations must prioritize endangered species restoration, the values within Grand Canyon National Park and Glen Canyon National Recreation Area, and equitable water distribution. The Secretary of the Department of the Interior (DOI) and the National Park Service (NPS) have the responsibility to "conserve the scenery and the natural and historic objects and the wild life therein" (National Park Service Organic Act of 1916 (16 U.S.C. Sec. 1-18f, 39 Stat 535). Further, the Endangered Species Act (Endangered Species Act of 1973 [Public Law 93-205, 87 Stat. 884]) requires that: Each Federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency (hereinafter in this section referred to as an ''agency action'') is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined by the Secretary, after consultation as appropriate with affected States, to be critical, unless such agency has been granted an exemption for such action by the Committee pursuant to subsection (h) of this section. In fulfilling the requirements of this paragraph each agency shall use the best scientific and commercial data available. (Sec. 7(2) [16 U.S.C. 1536], emphasis added) The Grand Canyon Protection Act (GCPA) (1992) specifies that Glen Canyon Dam "shall" be operated in a manner that is protective of Grand Canyon National Park and Glen Canyon National Recreation Area: "The Secretary shall operate Glen Canyon Dam... in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use." (Grand Canyon Protection Act (GCPA) (1992), Section 1802(a)) When the GCPA was passed in 1992, it was passed with the intention of reversing damage that Glen Canyon Dam's hydropower production was inflicting on Grand Canyon. Senate bill sponsor Senator John McCain explained, "widely fluctuating water releases from the dam, primarily for the maximum generation of hydroelectric peaking power, are contributing to the irreversible erosion of river beaches. It is critical to recognize that river beaches are not merely convenient resting spots for river rafters, hikers, and Grand Canyon campers. The beaches are extremely valuable biological resources which support riparian vegetation and diverse forms of wildlife. They are precious and fragile ecosystems which are as vital a part of the canyon as a view from the South rim and just as deserving of protection."1 Representative George Miller, who sponsored the bill in the House elaborated, "In the name of more electric power production mindless and unnecessary damage is being inflicted every day on the resources of the Grand Canyon, one of the most precious park resources in the world... the daily operation of Glen Canyon dam to produce hydroelectric power was wreaking havoc on the beaches and wildlife habitat at the bottom of Grand Canyon."2 The GCPA specifically mentions compliance with the Colorado River Storage Project Act of 1956 (Public Law 84-485) (CRSP), the law that authorized the construction of Glen Canyon Dam, in reference to water: Compliance With Existing Law. -- The Secretary shall implement this section in a manner fully consistent with and subject to the Colorado River Compact, the Upper Colorado River Basin Compact, the Water Treaty of 1944 with Mexico, the decree of the Supreme Court in Arizona v. California, and the provisions of the Colorado River Storage Project Act of 1956 and the Colorado River Basin Project Act of 1968 that govern allocation, appropriation, development, and exportation of the waters of the Colorado River basin. (GCPA Sec. 1802(b)) Regarding hydropower, GCPA only discusses the need to replace Glen Canyon Dam's power with other power supplies. Through the GCPA, "the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established" were further prioritized above Glen Canyon Dam's hydropower production: SEC. 1809. REPLACEMENT POWER. The Secretary of Energy in consultation with the Secretary of the Interior and with representatives of the Colorado River Storage Project power customers, environmental organizations and the States of Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming shall identify economically and technically feasible methods of replacing any power generation that is lost through adoption of long-term operational criteria for Glen Canyon Dam as required by Section 1804 of this title. The Secretary shall present a report of the findings, and implementing draft legislation, if necessary, not later than two years after adoption of long-term operating criteria. The Secretary shall include an investigation of the feasibility of adjusting operations at Hoover Dam to replace all or part of such lost generation. The Secretary shall include an investigation of the modifications or additions to the transmission system that may be required to acquire and deliver replacement power. (GCPA, Sec. 1809) [see letter attachment for list of references] This need to protect Grand Canyon from damage associated with power production, while adhering to water delivery requirements, was emphasized in the words of Bill McDonald, Colorado River Basin States' Governors' Representative for Colorado River Reservoir Operations and the Upper Colorado River Commission: "Monthly and annual reservoir operations at Glen Canyon Dam are of the most concern to the States' Representatives and the	Sierra Club Grand Canyon	Alicyn Gitlin

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			Commission. Restrictions on within-the-month fluctuations for power releases are of concern only if those restrictions interfere with the volume of water to be released in any given month."3 The same sentiment is presented in this unattributed quote from a Bureau of Reclamation PowerPoint on the subject: "The purpose and intent of section 3 is simple. This language is intended as a clear, concise directive to the Secretary on how to operate Glen Canyon Dam. The Secretary must operate the dam to protect the downstream resources within the context of the Secretary's water compact responsibilities and other elements of the "Law of the River." For the last fifteen years, the Secretary appears to have ignored the resource protection responsibilities in favor of maximizing production of peaking power. Section 3 is intended to provide clear direction to the Secretary as to what his responsibilities are."4 Hydropower generation is intended to be "incident" to other purposes set forth in the Colorado River Storage Project Act of 1956 (Public Law 84-485), the act which authorized Glen Canyon Dam. The Secretary of the Interior was authorized to "construct, operate, and maintain" Glen Canyon Dam: ". . . for the purposes, among others, of regulating the flow of the Colorado River, storing water for beneficial consumptive use, making it possible for the States of the Upper Basin to utilize, consistently with the provisions of the Colorado River Compact, the apportionments made to and among them in the Colorado River Compact and the Upper Colorado River Basin Compact, respectively, providing for the reclamation of arid and semiarid land, for the control of floods, and for the generation of hydroelectric power, as an incident of the foregoing purposes..." (43 United States Code [U.S.C.] SS620, emphasis added) CRSP specifically demoted power production below other purposes: SS620f. Powerplant operations The hydroelectric powerplants and transmission lines authorized by this chapter to be constructed, operated, and maintained by the Secretary shall be operated in conjunction with other Federal powerplants, present and potential, so as to produce the greatest practicable amount of power and energy that can be sold at firm power and energy rates, but in the exercise of the authority hereby granted he shall not affect or interfere with the operation of the provisions of the Colorado River Compact, the Upper Colorado River Basin Compact, the Boulder Canyon Project Act [43 U.S.C. 617 et seq.], the Boulder Canyon Project Adjustment Act [43 U.S.C. 618 et seq.], and any contract lawfully entered into under said Compacts and Acts. Subject to the provisions of the Colorado River Compact, neither the impounding nor the use of water for the generation of power and energy at the plants of the Colorado River storage project shall preclude or impair the appropriation of water for domestic or agricultural purposes pursuant to applicable State law. (43 U.S.C. SS620f, emphasis added) [see letter attachment for list of references] CRSP also authorizes and directs the Secretary to take actions necessary to conserve archaeology, wildlife, and scenic values. This authority was strengthened to a mandate to "protect, mitigate adverse impacts to, and improve" such values with the later passage of GCPA: SS620g. Recreational and fish and wildlife facilities In connection with the development of the Colorado River storage project and of the participating projects, the Secretary is authorized and directed to investigate, plan, construct, operate, and maintain (1) public recreational facilities on lands withdrawn or acquired for the development of said project or of said participating projects, to conserve the scenery, the natural, historic, and archeologic objects, and the wildlife on said lands, and to provide for public use and enjoyment of the same and of the water areas created by these projects by such means as are consistent with the primary purposes of said projects; and (2) facilities to mitigate losses of, and improve conditions for, the propagation of fish and wildlife. (43 U.S.C. SS620g, emphasis added) Glen Canyon Dam's power production was always intended to be subordinate to water provision, and was always allowed to be subordinate to cultural and environmental needs. GCPA further subjugated power production to be inferior to protecting Grand Canyon National Park. The Department of Interior (DOI) and Bureau of Reclamation (BOR) have a clear responsibility to use Glen Canyon Dam to manage water according to the obligations in CRSP and GCPA. Because hydropower cannot be prioritized above other purposes under CRSP and GCPA, BOR has the liberty to manage Glen Canyon Dam to effectively conserve water and natural resources without the additional burden of providing hydropower from the dam. The Federal government must "protect, mitigate adverse impacts to, and improve" the Colorado River Ecosystem (CRE) in Grand Canyon.		

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20957	5	POLICYGOV - Policy and governance	As BOR figures out how much water it will annually release through Glen Canyon Dam, the agency should aim to release water in a way that mimics a historically-timed hydrograph. On other rivers where dams have been operated to mimic the historic hydrograph, benefits extended to a multitude of aquatic and riparian resources.15 Evidence is accruing that the same would be true for Grand Canyon.16 Likewise, when daily fluctuations are minimized in a manner more akin to pre-dam patterns, downstream primary productivity increases.17 Unfortunately, the Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) makes a historically timed, spring or early summer experimental flood pulse, difficult to implement.18 The SEIS should create a way to operate Glen Canyon dam in a manner that is more similar to pre-dam conditions to favor the CRE in Grand Canyon. [see letter attachment for list of references] Importantly, drought should not be used as an excuse to postpone or cancel any flow management action intended to benefit native fish or redistribute sediment in Grand Canyon. In 2021 and again in 2022, a High Flow Experiment (HFE) was skipped despite U.S. Geological Survey scientists reporting the proper conditions for a 192 hour (8 day) HFE for the first time ever under LTEMP, and while sandbar size was the lowest in ten years.19 BOR decided not to implement the HFE because of "concerns about pool elevation and the Basin Fund, although there would have been a positive effect on sediments especially given the unprecedented drought conditions."20 This is despite the acknowledgement that HFEs do not affect annual water release volumes.21 Again, we point to the Grand Canyon Protection Act, which is clear about the obligation that the Secretary of Interior has to operate the dam "in such a manner as to protect, mitigate adverse impacts to, and improve" Grand Canyon. In this case, the Secretary had an unprecedented opportunity and let it pass without an adequate reason. Ecologically beneficial flow implementation is more vital than ever as we face the changed circumstance of new warm water-adapted introduced fish species (such as smallmouth bass) which require an urgent response. Scientists are now developing plans to experimentally manage these species with flow actions, and those actions must not be delayed. We should listen to the capable scientists working on this problem. The process of developing new post-2026 operations should not interfere with the upcoming Environmental Assessment on warm water exotic species in Grand Canyon, nor with its implementation. Of course, all of our recommendations depend upon the ability to move water through Grand Canyon. Regardless of how we choose to manage Glen Canyon and Hoover Dams, researchers warn us that the only way we will save the Colorado River or its reservoirs is to decrease the amount of water we remove from the river.22 We must do away with piecemeal planning and rapidly devise a holistic plan that sees the river as an interconnected entity, inseparable from the people who live in the Basin and depend upon its water.	Sierra Club Grand Canyon	Alicyn Gitlin
20981	7	POLICYGOV - Policy and governance	Flexibility and Support for Parallel Processes The new management system should provide certainty and stability for water users. At the same time, it must be adaptive and provide sufficient flexibility to meet the variable climate and changing needs. While the Nation recognizes that the NEPA process can be limiting, the Nation encourages Bureau of Reclamation to take a wholistic approach to future management of the Colorado River and to focus on long-term sustainable solutions. When this cannot be done within the NEPA process, the Nation encourages Reclamation to support complimentary parallel processes, such as any program to address unused and undeveloped tribal water, and to proceed with framework development in a manner that supports and does not hinder such processes.	Jicarilla Apache Nation	Edward Velarde
20982	5	POLICYGOV - Policy and governance	* The post-2026 operational guidelines and strategies must adhere to the Law of the River and recognize each State's authority to independently administer and distribute its water resources. System losses occurring at and below Lake Mead (e.g., transit losses, reservoir evaporation, ordered but not delivered supplies) must be accounted for and assessed against all Lower Basin contractors. Full accounting of Lower Basin tributary uses, in a manner consistent with the 1922 Colorado River Compact, is also necessary to properly develop any new guidelines and strategies.	Southwestern Water Conservation District	Steve Wolff
20985	2	POLICYGOV - Policy and governance	THE BUREAU'S ANALYSIS AND DEVELOPivIENT OF THE POST-2026 OPERATIONAL GUIDELINES MUST FOLLOW THE LAW OF THE RIVER. The District, and other water users on the River, have come to rely on the Law of the River and the Bureau's commitment to it and the water delivery contracts signed by the United States many decades ago. The post-2026 process and any operational guidelines developed as a result must certainly follow and comply with the Law of the River. A key tenet of the Law of the River is the priority system. Users have acted in line with and have placed enormous reliance on the system and the whole of the Law of the River for almost a century. As such, consideration of the modification of the priority system is necessarily outside the scope of the post-2026 process and the Bureau would need exceedingly persuasive justifications for departing from it. However, proper application of the priority system is vital to correctly evaluating the impacts of any Bureau plan for post- 2026 operations.	Bard Water District	meghan noblelaw.com; Ray Face
20985	5	POLICYGOV - Policy and governance	The District believes that the Law of the River must be the foundation for the development of post-2026 operations, and, as such, the Bureau's proposed and analyzed alternatives must follow and comply with the same.	Bard Water District	meghan noblelaw.com; Ray Face
20986	13	POLICYGOV - Policy and governance	Finally, the Post-2026 Operations must be consistent with the Law of the River, in particular the 1922 Compact, the 1948 Compact, and the 1944 Treaty.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez

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21066	1	POLICYGOV - Policy and governance	The 1922 Compact is no longer effective. I'm guessing that the Compact had no mention of a drought contingency plan when it was written, so the Compact should become null and void in our current drought situation. Here is our chance to adapt to these changes and manage them for the best possible outcome for all users as we move into the future.		Tiffany Mapel
21081	2	POLICYGOV - Policy and governance	Programs that the Upper Colorado River Basin states outlined in their five-part plan, such as System Conservation Pilot Program (SCPP), and Demand Management are tangible examples of where BOR should participate to provide additional resources, accountability, and consistency in implementation between states, because these programs will need to be significantly scaled up to make a difference (UCRC 2020 Report.) Putting federal resources into designing and implementing these processes and subsequent programs alongside the states and irrigators could help ensure transparency between local communities and the federal government, implement local solutions with multiple benefits, and better understand the cost of many potential programs moving forward.	Dolores River Boating Advocates	Rica Fulton
21094	11	POLICYGOV - Policy and governance	3. Fund the San Juan River Recovery Implementation Program to maintain and enhance the federal Endangered Species Act (ESA) recovery, which would assist the Tribe in maintaining its ESA compliance for its water settlement in Colorado, as well as the other tribal, states, and federal project participants.	Southern Ute Indian Tribe	Melvin Baker
21288	3	POLICYGOV - Policy and governance	Goodyear supports AMWUA's suggestion for the creation of a basin wide Municipal Sector Committee to serve as a forum for municipal water providers to share their unique perspectives to Reclamation during the NEPA process. Cities are best positioned to offer their unique input representing the residents, schools, businesses, hospitals, industries, manufacturers and more that reside within them. This stakeholder group should be in addition to Tribal representatives and state government officials, and not intended to supplant the input or authority of these representatives. Continued collaboration and consultation with the Basin States, Mexico, Tribes, NGOs, stakeholders, and water users - including municipal water providers - throughout the Basin is crucial for successful NEPA process and implementation of the Post-2026 operations.	City of Goodyear	Barbara Chappell
21302	8	POLICYGOV - Policy and governance	Compliance with environmental flow targets. Avoiding violations of existing Record of Decisions and other system guidelines related to protection of environmental flows/Grand Canyon requirements and targets, endangered fish requirements, and other ecological priorities should remain a core obligation of Reclamation. Failure to protect these values could create significant operational uncertainties due to litigation or significant adjustments to operations required to recover ecological systems that are disrupted by low-flow events.	City of Phoenix	Cynthia Campbell
132	1	RECBOAT - Recreation Boating	Lake Powell has been a memorable place for my family and friends. We were blessed with so much water this past winter to finally allow us to return back to lake Powell. Please consider the recreation interests that this lake offers others. Itâ€™s more than just a holding spot for water. Itâ€™s a way of life and place that serves so many.		Kylee Despain
183	1	RECBOAT - Recreation Boating	At age 22, my brother and I got to spend a summer working as boat instructors at the Bullfrog Marina. He had never been, but his love for the Lake grew so much that he worked 2 more seasons there and now has a Captain's license. The record low water levels the past few years were very concerning for us and many others. And in light of years so dry that they had to close most boat ramps, it is concerning to see that they are once again releasing large amounts of water from the dam. My hope is to one day take my own family on vacations to Lake Powell, and I would hate to have that opportunity taken away by what I perceive to be wasteful output of valuable water.		Malachi Dinkins
219	1	RECBOAT - Recreation Boating	We have been going to Lake Powell since I was a little kid and itâ€™s been home to so many amazing memories for friends and family. Our annual houseboat trip is by far our favorite week of the year. We love being able to enjoy the beauty of the lake while spending quality time with each other disconnected from all the stresses of the world.		Ally Costello
229	1	RECBOAT - Recreation Boating	Lake Powell is our families favorite summer activity! We have a houseboat and go every year! This year our boat was dry docked and wasnâ€™t able to be put back into the water in time for our trip. It is such an important trip to our family and many others. The memories created are priceless and our kids grow and develop so much after each trip! Please, please keep our reservoir full. After the drought this last year we were recasted seeing Powell so empty!Please keep our water		Holly Peterson
232	1	RECBOAT - Recreation Boating	Me and my family all adore powell with the amazing scenery and the amazing recreational opportunities. With water dropping weâ€™ve experienced many challenges and have destroyed props on our boats from newly appeared obstacles. Also, because the water levels are low itâ€™s a pain to launch boats because there is no public launch ramp available, so please keep us in mind and help make our vacations stress free :)		Cameron Huntsman
244	1	RECBOAT - Recreation Boating	My family has been recreating at lake Powell renting houseboats for 45 years, every year. We love the lake and want it to get back to full Pool or as close as we can. Please decrease the amount of water being released.		Matthew Farr

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266	1	RECBOAT - Recreation Boating	Lake Powell is the most beautiful lake in the world recreate on! My family has been coming here for nearly 30yrs and itâ€™s disheartening to see the lake at such low levels. 3588â€™ would make the castle rock cut accessible to all vessels which would save on fuel costs.		Jj Baldivino
289	1	RECBOAT - Recreation Boating	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines. Our family of 6 started boating in 2019 at the suggestion of a friend who knew we wanted more quality family time. We quickly fell in love with baiting and found that it does offer so much togetherness as a family. We have been boating in Lake Powell every year since. It has become a place of special memories for us. We are worried that we introduced our children to this incredible place only to have it disappear. We would be so sad if Lake Powell ever didnâ€™t exist and our kids told their children that there used to be a beautiful lake here, but it is gone now. Please make policies that will preserve lake recreation now and for future generations.		Courtney and Scott Rasband
351	1	RECBOAT - Recreation Boating	I've been going to Lake Powell for all of my life. My wife and I make an average of 6 to 10 trips each year to Powell. I never thought not having enough water would be a problem for lake Powell but the last 5 years has proved that it's a big issue. In 2021 we couldn't even put our boat on the lake between February and May when we do most of our trips.		Douglas Mikesell
353	1	RECBOAT - Recreation Boating	The recreational opportunity the lakes along the Colorado River provides is invaluable. I have been recreating on these lakes for over 35 years and it provides amazing awe-inspiring memories for me and my family. The recent drought has brought some significant challenges and the release of so much water from this seasons record watershed is insensitive and a shame.		Shawn Melendez
412	1	RECBOAT - Recreation Boating	I have been going to Lake Powell for family vacations since I was a small boy. I now have 4 little boys and we continue to carry on this family tradition of going to Lake Powell for family vacations a couple times every year. We absolutely love it! I always tell people that lake Powell is my favorite place in the world and canâ€™t imagine why anyone would want to drain it. When we get a chance to bring a family member or friend who has never been to Lake Powell we love watching them experience it for the first time. Itâ€™s such an incredible place, and being able to boat through such beautiful canyons is a world class experience that we love to share with others. Please take recreational use into account when making new water usage decisions. I dream of seeing Lake Powell at Full Pool but sadly weâ€™re going in the wrong direction more and more.		Mike Smith
446	1	RECBOAT - Recreation Boating	Watching the water rise this year was so exciting, but we are so disappointed that the Antelope Point Marina public ramp has not been usable because the water is too low.		Chantel Huntsman
459	1	RECBOAT - Recreation Boating	I have grown up going to Lake Powell for 40 years!! This includes ountless experiences and the most connecting core memories with hundreds of loved ones throughout the years. I now take my kids and family there and this is our most memorable family trip every year. We take several families with us each year. The ripple affect of this magical place is huge. There is no place on earth like it. When this lake is empty, it is worthless to people, it must be filled with water to continue these remarkable traditions. Nobody will visit unless there is water. It is way too hot. There is no reason why Lake Powell should not be full, unless thereâ€™s alternative motives such as money and power. Millions of people flock to Powell each year and you will hear from all of us. Itâ€™s that important and memorable. Make the right choice!		Rachel Wood
472	2	RECBOAT - Recreation Boating	For me lake Powell is more then just a lake itâ€™s been the place where I get to see friends and family that I rarely get to see. Every year my family has a family reunion at lake Powell my uncle has a houseboat and we a few wake boats that we bring down but in recent years with the drought itâ€™s been hard to go because of the worries of hitting a rock or not being able to reach some of the beautiful areas we love. The record lows weâ€™ve had in past years have greatly affected my family reunion trips weâ€™ve had to find different places to park our houseboat and we are always on edge for the worry of hitting a rock with our wake boats and potentially sinking. In fact a few years ago we had someone hit a rock and completely destroy one of our wakeboats which almost completely ruined the trip and it wasnâ€™t the drivers fault you couldnâ€™t even see the rock under the water until you were right above it.		Tyler Rex
494	3	RECBOAT - Recreation Boating	Enhanced Recreational Experiences: Maintaining higher water levels in Lake Powell translates to an enhanced recreational experience for visitors. Boaters, kayakers, and water enthusiasts, in general, benefit from a larger and more navigable lake, offering diverse opportunities for exploration and adventure.		Matthew Riddle
530	1	RECBOAT - Recreation Boating	My family has enjoyed recreating at Lake Powell for many years. Please fill Lake Powell		Nicole Keemer
542	1	RECBOAT - Recreation Boating	It is so important to us that Lake Powell remains full of water allowing us to access multiple areas of the lake. It is so sad when we come on low water years and the experience is not as great as it could be on higher water years.		Alicia Larsen
545	1	RECBOAT - Recreation Boating	These lakes are vital for water and recreation.		Vance Rhead
550	1	RECBOAT - Recreation Boating	The low water levels create hazards and diminish the beauty.		Dan Griffiths

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555	1	RECBOAT - Recreation Boating	Sadly many of those memories are no longer possible to be recreated due to the low water levels. Please refill Lake Powell to itâ€™s glory so my children and my childrenâ€™s children can make new memories.		Vance James
557	1	RECBOAT - Recreation Boating	We are so excited but also very disappointed in the water currently being released right after the cut was semi open. Boating at Powell has brought our family so close together. Please please make the changes necessary to keep Lake Powell at a full level.		Jason Wright
578	1	RECBOAT - Recreation Boating	It is time to save Lake Powellâ€™s water content and to change the rules and policies governing the water use to give us water storage and access to recreation on one of our greatest resources.		Brandon Newman
590	1	RECBOAT - Recreation Boating	I have have many memories on lake Powell. With the drought and lowering water levels I have been worried may family will o e day Iâ€™ve to stop going because of the low levels.		Lauren Olschewski
595	2	RECBOAT - Recreation Boating	You guys are letting TOO MUCH water out of Powell! The Antelope Point Marina needs to be usable!		Brienne Poole
600	1	RECBOAT - Recreation Boating	Sustaining Lake Powell is very important to our family and is a place we will likely visit numerous times a year for years to come. I hope to keep Lake Powell sustained so my children will be able to enjoy the lake as I have. There is nowhere else like itand itâ€™s a place that we should be able to enjoy for for years		Mason Winn
601	1	RECBOAT - Recreation Boating	For the past 2 year we have not been able to put the boat on the water in bullfrog because of low water levels. My personal interest dictate that the rules be changed so that the absolute minimum water levels at lake Powell go no lower then the minimum elevation to put a house boat on the water in bullfrog		Reese Romine
602	1	RECBOAT - Recreation Boating	I have been recreating at Lake Powell for over 25 years and it has been a special place that my family and I have enjoyed every year. We boat on the lake and would love to be able to boat for many years to come and continue on the memories with my own family now that I have kids. If we can preserve water levels at Lake Powell as much as possible it would be amazing!		Greg Ward
608	1	RECBOAT - Recreation Boating	ith the water levels, going down and more obstacles in the way itâ€™s harder to get out there and be confident in boating on the lake. Iâ€™d love to see them keep the water up so many people can continue to use the lake locally, and from far distances across the globe		Jade Ming
616	1	RECBOAT - Recreation Boating	I hope you will realize the importance of recreational activities in our lives! It is a place of peace and joy to so many people across the West and now the world!		Aimee anderson
12637	1	RECBOAT - Recreation Boating	Getting to see the natural wonders that Mother Nature has to offer. We love seeing Navajo canyon, Padre Bay and forgotten canyon. We have come to love this so much.		Tyler Stettler
12802	1	RECBOAT - Recreation Boating	Please keep the lake levels growing.		Sidney Jensen
16741	1	RECBOAT - Recreation Boating	Driving a boat through the mysterious and mesmerizing canyons of Lake Powell creates a place of timelessness and showcases the most beautiful parts of our shared American culture and history. It demonstrates how when Americans come together, we can create some of the most beautiful things the world has ever seen, and often intersecting and complimenting nature, as we hold it to be one of our most important virtues and heirlooms that we hope to pass down through generations. On my last trip to Lake Powell, I thought about my father and the time I have spent on the lake with him, and the fact that we will always have those moments of going through those beautiful canyons of Lake Powell together. That is where I hope to go back to visit him when he is gone, and that is where I hope my kids will go to visit me when I am gone.		Iman Jaffrey
16904	5	RECBOAT - Recreation Boating	Recreational use of the river corridor is set forth in the Colorado River Management Plan. Use is quantified by the daily number of trips launching (TAOT) and daily number of people launching (PAOT). TAOT was determined by the availability of campsites, which have severely degraded over time by the daily fluctuation of flows eroding beaches. The High Flow Experiments (HFE) have not and cannot make up for this beach erosion. Thus, continued daily flow fluctuations will negatively affect recreational use and enjoyment of the river corridor and may require a reduction in TAOT in the future.	Grand Canyon Private Boaters' Association	john vrymoed
20220	1	RECBOAT - Recreation Boating	I love Lake Powell and it has provided so many good times and memories for me and my family! We need to do whatever we can to make sure that these reservoirs are sustained to healthy levels where all boat ramps are usuable and access is available! Long live Lake Powell!!		Cindy Smoot
20469	10	RECBOAT - Recreation Boating	2. What are the lowest flows that can be safely navigated, given the inherent risks of river running, in different types of craft, especially large motor boats which enable under- served segments of the public to experience Grand Canyon?	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20476	4	RECBOAT - Recreation Boating	The LeChee Chapter and surrounding communities' water supply is extracted from Lake Powell. Fluctuating Lake Powell reservoir elevation levels have impacted operations at Antelope Point Marina and other tourism initiatives,	Navajo Nation	Buu Nygren
20490	4	RECBOAT - Recreation Boating	The issues of most concern to the NPS are the potentially significant impacts to recreational boating access	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	6	RECBOAT - Recreation Boating	Lake Mead and rafting in the Grand Canyon;	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	38	RECBOAT - Recreation Boating	Impacts to parks' infrastructure and recreational access resulting from very low water levels have occurred in recent years and water levels may continue to decrease if action is not taken to balance supply and demand in the system. In 2021 Glen Canyon went from having eleven maintained boat ramps on Lake Powell to two boat ramps and the park has made major financial investments to simply maintain the two remaining boat ramps. Similarly, over the past 10 years Lake Mead has gone from having eight boat ramps to just one and is planning for major infrastructure investments to keep even minimal lake access viable. In some locations at Lake Mead, such as campgrounds and marinas, it is increasingly difficult to provide visitors with access to drinking water or water to respond to structural fires. At both parks, reduced lake surface area has led to changes in wakeless areas, boat traffic congestion, safety concerns and increased boater travel times and gas expenditures. Launching large boats and traveling through narrower channels have become more time consuming and complicated. Smaller watercraft traffic has increased in some areas, and this presents challenges for safe navigation in tight channels when combined with larger boats.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20599	1	RECBOAT - Recreation Boating	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		David Larson
20599	6	RECBOAT - Recreation Boating	Please also consider a higher degree of regulation of the use of the lake including, boat size and the futureâ€"use of fossil fuel engines to help maintain the integrity of the natural environment and the quality of recreation for all who use the reservoir.		David Larson
20608	13	RECBOAT - Recreation Boating	reliable safe flows for river running as climate impacts accelerate.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20612	1	RECBOAT - Recreation Boating	My name is David Brown, I am a Carpenter and Grand Canyon River Guide. I hope you will take seriously the unique and extremely time sensitive opportunity to evaluate the Colorado River and its user allocations especially as it relates to our growing population, diminished water supply and warming temperatures.		Dave Brown
20621	5	RECBOAT - Recreation Boating	The 2020 review of the 2007 plan found that the BOR was "largely effective". BlueRibbon believes that in the case of recreation, BOR was not effective as we have seen recreational resources such as marinas and ramps closed due to water levels. There have been "experimental releases" that should not be implemented during times of drought. BRC appreciates that BOR recognizes that this process needs to be more inclusive of a wide range of stakeholders compared to the process in 2007. We have had thousands of our members and supporters engage in this planning effort, because they recognize that the 2007 Interim Guidelines didn't adequately account for the impact to recreation that would result from low water levels.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr

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20913	11	RECBOAT - Recreation Boating	Additional problems with operation of Lake Powell at or near deadpool The river outlet works intakes are located nearly 240 above the bottom of the dam, meaning that a large pool of approximately 1.7 million acre-feet of water is effectively 'stranded' behind the dam33. This large pool of water, commonly referred to as "deadpool", could become a common occurrence in the near future at Lake Powell. In addition to the inability to access the 1.7 million acre-feet of water, operating near deadpool at Lake Powell would create a number of problems for the reservoir managers, Colorado River Basin water users, and other constituencies. Not the least would be a stagnant body of water sitting in a desert environment that would be conducive to stimulating harmful algal blooms and other water quality problems. Toxic algal blooms have already begun to emerge in Lake Mead, with one swimmer being killed by a brain-eating amoeba in 2022.34 At deadpool, the reservoir is subject to rapid changes in elevation, due to the martini glass-like shape of Lake Powell's vertical cross section. Nearly half of the reservoir's capacity resides above 3,600 fasl35, meaning that when water levels drop to deadpool elevation ranges, even moderate inflows can cause water levels to rise over 100 feet in one season36. This could create numerous problems for both reservoir visitors and the National Park Service recreation managers at Lake Powell. These rapid elevation changes would force the National Park Service to move marinas and extend boat ramps, which is costly and increases safety risks. For most of 2021 and 2022, the majority of National Park Service and Tribally managed launch ramps were unusable. Current plans to adapt to declining reservoir levels include abandoning the current Bullfrog Marina site and moving those facilities into the main channel at an estimated cost of $25 million dollars37. With the significant cost of extending boat ramps, walking ramps and marina utility infrastructure, there may come a point of diminishing returns on increasingly large and frequent taxpayer investments. After such investments are made to adapt to deadpool elevations, a subsequent medium or large water runoff year could lead to significant damage to this new infrastructure. This could create infrastructure challenges for the National Park Service, which is already suffering from a large backlog of maintenance projects.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	27	RECBOAT - Recreation Boating	Emerging resources in Colorado and San Juan Rivers Cataract Canyon, located below the confluence of the Green and Colorado Rivers, is home to some of the most notorious whitewater in North America. It is known by many river rafters and guide companies as "Utah's Grand Canyon". When Lake Powell was full, the flowing river and whitewater rapids of Cataract Canyon ended below Big Drop 3 Rapid, which is also the boundary between Canyonlands National Park and Glen Canyon National Recreation Area. Since Lake Powell's decline from its most recent peak in 1999, the Colorado River in Cataract Canyon has reestablished itself in what used to be a reservoir. Map and cross section of emergent sections of Colorado River entering Glen Canyon. Returning Rapids 2022 Field Binder. What was left behind from Lake Powell's retreat are massive sediment deposits in the Cataract, Narrow Canyon (just downstream), and upper Glen Canyon. Over the years, a large amount of reservoir sediment in Cataract has been scoured away, and the natural characteristics of the Colorado have begun to reestablish. This transformation has been documented extensively by The Returning Rapids Project66, which has conducted numerous research trips in the reemergence area with coordination from NPS, USGS, GCMRC, and multiple researchers from the University of Utah and Utah State University. Cataract Canyon is 41 miles long and historically had 49+ rapids in its approximately 400 feet of gradient. Out of those 41 miles, 24 were affected by the reservoir and its resulting sediment delta. Out of the 49+ rapids, all but 23 were impacted by the reservoir and then covered by the sediment delta. Since the retreat of the reservoir beginning in the mid 2000s, 7 major rapids have since reemerged. In spring of 2023, there were approximately 44 miles of flowing river in the mainstem Colorado River that were once inundated67. In Cataract Canyon, the return of the river and its whitewater rapids have created a recreational experience that hasn't been available since the reservoir first drowned the canyon. 3,000 to 4,000 visitors to the park unit raft down this section of river every year68. The prospect of a returning river rafting economy to Glen Canyon has been discussed publicly by former GCNRA superintendent Billy Shott69. The rapids that have returned in lower Cataract Canyon add a significant experiential value to a Cataract Canyon trip -- one of Utah's most popular rafting destinations and most popular expeditions from outfitting companies around the region. For most of the past 5 years, there has been river current all the way to the Hite area, and parties can run Cataract without the use of motors -- which reduces the overall carbon footprint of this recreational activity.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20996	11	RECBOAT - Recreation Boating	Recreational boating and fishing are important recreational activities at Lake Mead and Lake Powell. Recent studies have quantified the economic impact these outdoor and wildlife-related recreational activities have on the local economy. Fishing related expenditures in Mohave County and Coconino County, which includes food, lodging, transportation, and equipment, was estimated at $79.3 and $70.6 million dollars, respectively, by the Arizona Anglers' Expenditures and the Economic Impact of Fishing in the State report (Duda et al. 2022). It has also been estimated that more than 60 percent of all visitors to the Lake Mead National Recreation Area use some type of motorized watercraft (Rosen et al. 2012). The Department has concerns regarding impacts to boating recreation and Department access for wildlife management purposes as water levels have declined at Lake Mead and Lake Powell. Several boat ramps at these two large and very popular reservoirs have become unusable.	Arizona Game and Fish Department	Luke Thompson

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20996	12	RECBOAT - Recreation Boating	Recent planning efforts at Lake Mead National Recreation Area for boating access seem to be focused on actions to be taken when reservoir elevations improve, as no launch ramp extensions or relocations are being proposed on the Arizona side of the reservoir. The Department considers this to be unacceptable, given that the system has been experiencing a prolonged period of drought and low-runoff and future reservoir elevations are uncertain. The Department requests BOR, in partnership with the National Park Service, identify operational guidelines and strategies that retain recreational boating access in Arizona at Lake Mead and Lake Powell.	Arizona Game and Fish Department	Luke Thompson
21066	4	RECBOAT - Recreation Boating	* The multi-million dollar recreation industry for Boating. A water level of 3600 is ideal for so many reasons: all marinas and launch ramps are open, and would allow for the crucial mid-lake marina to return. Many connections on the lake would also be open.		Tiffany Mapel
21066	7	RECBOAT - Recreation Boating	Here are some good reasons for keeping a sustainable water level in Lake Powell: Wildly fluctuating water levels strains infrastructure on Lake Powell, as whole marinas need constant moving and re-adjusting, and launch ramps go in and out of service.		Tiffany Mapel
139	1	RECOTHER - Recreation Other	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell. Please stop releasing water from Lake Powell.		Angela Fielding
160	1	RECOTHER - Recreation Other	Lake Powell has been a family tradition of ours for over 40 years. I have some of my best childhood memories at Lake Powell and so do my now grown children. I understand the water concerns, but I do believe that we need to have flexibility as well. Lake Powell is one of the most beautiful lakes, and it is not only sacred to the Navajo nation, it is all so sacred to all of us who cherish it deeply.		Elizabeth Brouse
174	1	RECOTHER - Recreation Other	As a resident of Southern Utah, my family frequently enjoys the recreation use of Lake Powell, recent years have made it difficult to access the lake. This is NOT all because of drought years. This is because they are draining too much water! This is the biggest water run off we have had in over 40 years and because of the state the Bureau of Reclamation has put Lake Powell in the last few years. We are still not up to the levels it should be! They are currently closing Castle Rock Cut because of how much water that is drained. Our lively hood in this area runs on tourism! We need our lakes full!		Brittany Hoyt
176	1	RECOTHER - Recreation Other	This lake is so important and having the water levels be high enough is not only crucial to safety		Brynlee Shippen
176	2	RECOTHER - Recreation Other	So please fill Lake Powell!		Brynlee Shippen
176	3	RECOTHER - Recreation Other	I encourage the Bureau of Reclamation to consider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		Brynlee Shippen
178	1	RECOTHER - Recreation Other	I have been enjoying Colorado river since I was a teenager. I am now 52. I want my kids to be able to enjoy the river as much as I have; itâ€™s not just the boating itâ€™s the fishing. Itâ€™s the dirtbike riding and it has definitely deteriorated over the years. I have been a homeowner there. Please reset, these guidelines, in order to keep the rivers and lakes full AND to conserve the water that we may not have when the droughts come again.		Mike Vrbas
220	1	RECOTHER - Recreation Other	For the past 3 generations our family has enjoyed lake powell. It has been a place that has brought us together. Over recent years the lake levels have been so low that it has affected those that come to powell to enjoy its beauty and spend time with family and friends. I plead with you to let us fill lake powell up.		Chris Lohner
234	1	RECOTHER - Recreation Other	I wish to see the lake continue to function as a power generator and water storage as well as recreational use for many years to come.		Tyler Cole
236	2	RECOTHER - Recreation Other	I have grown up playing at this lake and exploring all the Indian ruins and awesome arches. I love it and want my kids to do the same.		Amy Stewart
269	1	RECOTHER - Recreation Other	We have grown up on Lake Powell and we are making the same memories for our children on this Lake. Just because this was how it was in the past does not mean it should continue that way when it comes to the most precious resource we have...water! Don't let memories be taken away because we can change things for our future generations. Powell is an important part of the community of Hamksville and Paige AZ.		Sally Page
286	1	RECOTHER - Recreation Other	I myself have been enjoying Lake Powell from the time I was a young child and have taken my kids and grandkids to Lake Powell to show them the amazement of the lake. Our families fondest memories have been at the lake hiking,boating,etc. Please make the lake be there for our future and all the families the love the lake.		Mark Allington
311	1	RECOTHER - Recreation Other	Managing national resources for the benefit of the people is all of our responsibility. Our family has enjoyed Lake Powell for over 30 years, restore and maintain her beauty and enjoyment for all and make a responsible plan, require others to do the same, water conservation by cities and states receiving water, new water storage for reclamation and protect the land for wildlife and enjoyment for all.		Jill Schafer

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341	1	RECOTHER - Recreation Other	. Iâ€™ve been going to lake powell multiple times every year since I was 2 weeks old. Itâ€™s been one of the biggest loves of my life and is favorite my place on the planet. Itâ€™s become my 6 kids favorite family activity and have since been going more often lately. At the lower lake levels, itâ€™s not the same lake; beUTAHful still but doesnâ€™t allow for as much ease of access to see more of what it offers. Please keep the lake full.		CJ Heringer
413	1	RECOTHER - Recreation Other	For every family that can credit lake Powell with the unity and tight bonds that develop after vacationing at lake there for the past 24 years, I beg you to reconsider the recreation interests Lake Powell, Lake Mead and the other reservoirs in the Colorado River Basin as BOR reconsiders the 2007 Colorado River Interim Guidelines.		Kristin Walker
494	4	RECOTHER - Recreation Other	Access to secluded coves, sandy beaches, and hidden gems becomes possible, enriching the overall experience and attracting even more tourists to the area.		Matthew Riddle
494	7	RECOTHER - Recreation Other	Preserving Lake Powell's recreational opportunities through higher water levels is not only crucial for the region's economy but also for the environment, cultural heritage, and water resource management.		Matthew Riddle
605	1	RECOTHER - Recreation Other	Lake Powell has been a source of refuge and recreation for my family for years and years. We love to camp and be in the outdoors, but the sheer size and scope of Lake Powell allows us to completely disconnect and tune in to nature and our family that no other recreational location has provided. It is one of a kind and we wouldnâ€™t be able to enjoy or appreciate the natural landscapes like we have in the past without the water there.		Nathan Balser
799	2	RECOTHER - Recreation Other	A realistic analysis of recreation impacts in the EIS also needs to go beyond the obvious implications to a 50 year pattern of power boating as the primary recreation on the reservoir and include that more historic, and appropriate future, uses such as hiking and floating in the river and its side canyons.		Janet
900	3	RECOTHER - Recreation Other	In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert, Gregory Natural Bridge, and others, along with lush riparian ecosystems, and priceless archeological sites.		Ernest Long
1979	2	RECOTHER - Recreation Other	and stream flows that replenish sandbars within the canyon are explored and maintained.		Don Rose
6910	1	RECOTHER - Recreation Other	Remove glen canyon damn.		Mark Neitenbach
9202	1	RECOTHER - Recreation Other	Just wanted to remind you about the value of birds for tourism, since everything seems to be profit driven these days.		Barbara Palmer
15618	3	RECOTHER - Recreation Other	The Colorado River is a important to our economy, recreation,		Shenandoah Marr
16668	2	RECOTHER - Recreation Other	And keeping adequate water in Lake Mead and Lake Powell will allow for continued lake recreation on these two magnificent lakes.		Tina
16688	2	RECOTHER - Recreation Other	And keeping adequate water in Lake Mead and Lake Powell will allow for continued lake recreation on these two magnificent lakes.		Edward Timmons
17241	25	RECOTHER - Recreation Other	Other resource impact analyses should include (but not be limited to): - Recreational resources;	National Audubon Society	Jennifer Pitt
17791	1	RECOTHER - Recreation Other	I live 80 miles from the North Rim of the Grand Canyon. I've spent well over a year of my life down there, running the river and backpacking. The Colorado River creates a place full of miracles, but it requires some protection.		Susan Hand
19864	1	RECOTHER - Recreation Other	Although I live in Virginia, I have rafted the CO River twice in my lifetime. Both magnificent experiences have heightened my awareness of the need to protect the whole area as much as possible. I sincerely thank you for your continued efforts to save the Colorado River and its tributaries for posterity.		Virginia Barber
20268	3	RECOTHER - Recreation Other	Perhaps most important is the opportunity to save these natural and archeological wonders that were lost when Glen Canyon was drowned. In the years since Lake Powell has declined, we have seen the reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge,		Rowan Epstein
20417	8	RECOTHER - Recreation Other	Healthy river flows must be maintained to support irreplaceable wildlife habitat, environmental resources, and recreational uses along the Colorado River and its tributaries.	Western Resource Advocates	Bart Miller
20469	5	RECOTHER - Recreation Other	* sufficient base flows that ensure safety and navigability for the 20,000+ people who run the river each year, and	Grand Canyon River Guides, Inc.	Lynn Hamilton
20469	6	RECOTHER - Recreation Other	* numerous sandbars, camping beaches, and associated habitats, distributed throughout the Colorado River ecosystem.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20469	11	RECOTHER - Recreation Other	1. Considering that High Flow Experiments (HFE) are the ONLY tool for managing the sediment resource in Grand Canyon by replenishing sandbars and camping beaches as well as protecting cultural sites, how can HFE's (in particular, naturally timed HFE's under sediment enriched conditions) be ensured and optimized through this EIS considering our low water future?	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20484	1	RECOTHER - Recreation Other	As a freelance photojournalist working for publications like National Geographic Magazine, High Country News and the New York Times, I have dedicated my last two and a half years documenting Glen Canyon as it emerged from under Lake Powell. In that time, I have witnessed a miracle taking place Â— a silver lining in these drought-stricken times. On its own according, an unprecedented re-wilding has been taking place in the stone labyrinth that is Glen Canyon. I have seen beaver return, making ponds that support rare and endemic fish and amphibians. Mountain lion and bobcat tracks hint of a larger recovering food chain. Cottonwoods and willows in places tower 20 feet high Â— an incredible feet given just a dozen years of recovery. In other places, hanging gardens are rebuilding their delicate balconies of maidenhair fern and stream orchids. IÂ'd hate for us to lose all of this.		Elliot Ross
20490	41	RECOTHER - Recreation Other	River-Related Resource Concerns Lower water levels in Lake Powell have led to reduced numbers of High Flow Experiments (HFE) through Grand Canyon. HFEs are very effective tools to manage river channel structure, geomorphology, and sediment dynamics. HFEs also represent the only system-wide tool to rebuild sandbars, beaches, and near-shore habitat in the canyon, thus they are critical for the protection of cultural resources and providing high-quality recreational access along the river. HFEs would not be available close to or below powerpool elevation at Lake Powell and will impact river rafting by reducing the area of or eliminating some camping beaches in the long-term. Also, when Powell is below powerpool, a lower and slower river through the Grand Canyon will slow trips down, leading to more human impacts in certain areas. Lower flow levels will also increase navigation challenges through the canyons' many rapids and may limit the use of larger motorized craft. The Hualapai Tribe has expressed significant concern to the NPS regarding sand buildup in Grand Canyon West, which is negatively impacting recreation on the river and negatively impacting the Tribe's commercial recreation interests. While some aspects of this problem are related (to?) the level of Lake Mead, GCMRC is studying whether HFEs could help with this problem by distributing sand onto beaches and sandbars rather than settling into the channel.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	43	RECOTHER - Recreation Other	Less frequent HFEs may also negatively impact campable areas impacting river recreation in the Grand Canyon.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20621	8	RECOTHER - Recreation Other	We feel that recreationists have a right to access and use stored water. So do the states of Colorado, Utah, and Arizona. As a natural resource, water is to be used for the benefit of all of us. It is in the public interest to allow recreational use of our natural resources that leads to no adverse effect or depletion of those assets. Colorado River water belongs to us all and we encourage any move in a direction that enables the benefits of this water to be enjoyed by the greatest number of users.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20899	29	RECOTHER - Recreation Other	14. Outline and assess costs and feasibility of abandoned recreational infrastructure at Lakes Mead and Powell. 15. Outline and assess new recreational opportunities at places such as Glen Canyon and Lake Mead NRAs if the system operations change.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	22	RECOTHER - Recreation Other	Emerging Resources in Glen Canyon tributary canyons Geologic Wonders Glen Canyon National Recreation Area has experienced extreme changes in the past 20 years as Lake Powell water levels have receded. As of spring 2023, over 100,000 acres of land that were once inundated under Lake Powell had emerged50. Unique geologic and natural features like Cathedral in the Desert, Gregory Bridge, La Gorce Arch, and countless waterfalls, grottos, alcoves, and other natural wonders once again became highlight features of the park unit. These one-of-a-kind features are what inspired former Interior Secretary Harold Ickes to propose making Glen Canyon the central part of a larger Escalante National Monument in the 1930's, and what inspired countless western writers like Wallace Stegner, who said Glen Canyon would have made a "superb national park". The emergence of these emerging treasures have garnered attention from national51 and international media outlets, and have even been used for tourism promotions by GCNRA concessionaires52. When the level of Lake Powell rises, these features are submerged by the reservoir, and are effectively lost to visitors. The Post-2026 Guidelines must acknowledge the negative impacts the reservoir has on these unique geologic features and the intrinsic value that they have to both American and global citizens alike.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	29	RECOTHER - Recreation Other	On the San Juan River, a similar emergence of the river corridor has taken place with the retreat of Lake Powell. In Spring of 2023, there were approximately 45 miles of flowing river into areas once submerged by Lake Powell. The geographic characteristics of the San Juan River are different from the mainstem Colorado: the river gradient is less steep, and the pre-dam river channel was much wider with areas where the river braided through wide shallow reaches. [see images in attachment] At full pool in the 1980s-2000, the reservoir backed the river up all the way to Grand Gulch. As the reservoir level receded in the 2000s, the aggradation of sediment did not. It's possible that the full pool level being near Paiute Farms greatly amplified the area's ability to trap sediment. The continued backfill traveled upstream several more miles, covering the river corridor and rapids with sediment up to 40 feet above Lake Powell's full pool line. [see images in attachment] The rapidly changing river corridors of the Colorado and San Juan Rivers are providing new recreational opportunities in GCNRA that didn't exist in the 2007 Interim Guidelines, as well as large-scale ecological succession. These emerging areas are enhancing the ecosystem and helping to provide habitats for listed and endangered species. [see images in attachment] On page 296 of the Draft SEIS released by Reclamation in 2023, the document states, "Whitewater boating is the key recreational activity in the Grand Canyon from Lees Ferry to the Diamond Creek or Pearce Ferry take-outs. Other reaches are not predominantly whitewater localities; therefore, they will not be discussed in this section." It fails to list anything about the returned river corridor in Cataract Canyon and flowing river on the San Juan. Referring to this area solely as "Lake Powell'' and not Glen Canyon demonstrates that reservoir recreation is favored over river ecosystems. This section solely discusses the potential impacts to reservoir and reservoir-based recreation. There is no mention of how to manage both the rivers and the reservoir. In order to fully understand the environmental and recreational impacts of reservoir operations on these sections of river, these significant resources must be taken into consideration in the Post-2026 EIS. The American public deserves to get an accurate assessment of the recreational resource values that Glen Canyon can and does supply.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	32	RECOTHER - Recreation Other	If Lake Powell is to be managed at low levels moving forward, the Post-2026 NEPA analyses must include planning for a permanent solution for the Hite boat ramp and the broader recreation area. Without a more comprehensive approach to the evolving recreation characteristics in the park, GCNRA will be forced to simply react to problems or ignore them as they come. While the disappearance of Lake Powell creates big challenges for many stakeholders, it has nonetheless created significant recreation opportunities in the park. The Post-2026 analyses and resource planning need to optimize management for this reality, pursuant to the mission of the NPS and Grand Canyon Protection Act.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20947	10	RECOTHER - Recreation Other	River recreation needs to be a fundamental component of the NEPA analysis	American Whitewater	Kestrel Kunz
21023	1	RECOTHER - Recreation Other	My family has been going to Lake Powell since I was a kid, every single year. It is a tradition of ours. I love Lake Powell and I hope that it can be saved and that the plans can prioritize both the practical aspects of the Lake and those who need it for their daily lives, but also prioritize the recreation and economic impact that recreation has on many.		Jordan Koopmans
21066	2	RECOTHER - Recreation Other	One part that was not in the 1922 Compact was any consideration for recreation. That has since bloomed into a multi-million dollar industry.		Tiffany Mapel
21120	1	RECOTHER - Recreation Other	I want to encourage you to prioritize REDUCING usage throughout the lower basin and to support recreation opportunities. As is happening in other parts of the country, we are seeing an urgent need to preserve and protect our resources for future generations. We cannot kick the can down the road on making tough decisions about our water.		Tiffany Boyd
21132	2	RECOTHER - Recreation Other	On top of this, the Glen Canyon dam has flooded what is know as "Americas lost National Park". Glen Canyon is known by this for a reason. When the lake was at around 20% of capacity it exposed the natural beauty of the desert that was lost almost 60 years ago. When the desert was exposed again it showed amazing signs of growth and regeneration, an almost complete restoration. This means that if a full bypass of Glen canyon damn was implemented, Glen Canyon could be almost fully restored and be a more sustainable source of recreation then the reservoir is now, not to mention far more inclusive.		Magnus Tveit
20996	5	RECTFISH - Recreation Sport Fishing	The Department is concerned about the impact of higher water temperatures to the blue ribbon Rainbow Trout fishery at Lees Ferry below Glen Canyon Dam. Anglers from around the world travel to Lees Ferry to fish for high quality Rainbow Trout, and this blue ribbon recreational sport fishery is economically important to the State of Arizona, the small community of Marble Canyon, the City of Page, AZ, and Coconino County Arizona. A 2013 statewide angler survey estimated the contribution of the Lees Ferry fishery to the State's economy in excess of $16.8 million, helping to support 251 jobs in Arizona (Fedler 2014). Anglers support local businesses such as hotels, restaurants, and other service providers, in addition to utilizing fishing and outdoor recreation equipment suppliers and guides. The Glen Canyon Dam Long-Term Experimental and Management Plan (LTEMP) states the resource goal for the Rainbow Trout fishery is to "Achieve a healthy high-quality recreational Rainbow Trout fishery in Glen Canyon National Recreation Area (GCNRA) and reduce or eliminate downstream trout migration consistent with NPS fish management and ESA compliance" (Bureau of Reclamation and National Park Service, 2014). Maintaining cold water releases to <16degC (<60.8degF) from Glen Canyon Dam is critical for achieving these goals.	Arizona Game and Fish Department	Luke Thompson

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Form 4	-	SCOPE - Scope	Don't forget the SALTON SEA in your planning. Import Ocean water to the Salton Sea. Colorado River water cuts without ocean water imports will destroy the Salton Sea.	Uknown	
2	1	SCOPE - Scope	Continuing without water importation to the Salton Sea will enhance our pending earthquake damage. Please remember this when a quake cuts us off from civilization. You haven't cared, nor listened to anyone who is a stakeholder in the valley. I am sending this as another underlooked reason for the water importation to the Salton Sea.		Judy Graham
11	3	SCOPE - Scope	Additionally, I think the structural deficit must be eliminated. The upper base and depletion schedule must be eliminated. This would include any and all water contracts from Flaming Gorge reservation reservoir. The upper base and hydrologic determination must be modified to reflect the current 30 year	Living Rivers	John Weisheit
11	5	SCOPE - Scope	I would like this analysis to be more than just about Glen Canyon Dam and Hoover Dam, because the Bureau of Reclamation involved the operations of Flaming Gorge dam, Blue Mesa Dam and Navajo dam to prevent the outlet works at Glen Canyon Dam from essentially sucking air.	Living Rivers	John Weisheit
14	1	SCOPE - Scope	But I just want to let you know you should include Sultan Sea into consideration for this.		Nikola Lockage
18	2	SCOPE - Scope	But I do think the long-term solution really involves all 7 States and Mexico, and some sort of proportional cutbacks that affect all of them, and I think, in the short term, you can only do what you can do, considering you only have control over the lower basin uses. But I think the long-term big picture really has to involve all 7 states cooperating to get lower than they currently are today. And that'll be my comment directed at the long-term operation question.		John Rickenbach
651	8	SCOPE - Scope	A large part of the difficulty here is that many states are demanding their share of the water they are entitled to from the 1922 Colorado River Compact. That was 101 years ago. Times have changed. That compact has to be thrown out in its entirety and we start over from scratch with today's accurate data to determine which state gets what amount. I believe the agreement expires at the end of this year (I could be wrong), once it expires, it doesn't apply any longer and we start over from scratch. If you are able to pound out an agreement that everyone is unhappy with, yes unhappy as nobody is going to be happy, it has to be reviewed and adapted every 5 years, 10 years at the most. It has to be maintained and adjusted as the situation dictates. This situation is not going to get better, it will only continue to worsen. We can't look at this every 100 years as I can pretty much guarantee you that we won't be here in our current lifestyle in 100 years if we were to make that the review date.		Steve Davis
654	1	SCOPE - Scope	If that is the case, please be sure to consider the environmental consequences to the Salton Sea.	University of Arizona	Flessa, Karl W - (kflessa)
782	6	SCOPE - Scope	Second, because of the currently depleted flows and predictions for future depletions of up to 50% of the entire river, USBR must stop all proposed new dams and diversions across the entire basin because they will divert more water out of the river, exacerbate ecological harm, and escalate political and management chaos.	Save the Colorado	Gary Wockner
832	6	SCOPE - Scope	2. Stopping all proposed new dams, diversions and pipelines.		Gary Wockner
11809	2	SCOPE - Scope	Consider the Grand Canyon, the Lower Colorado River, the Salton Sea, and wetlands in the Colorado River Delta. They all need sustained water to protect unique bird species like the Bald Eagle, Yellow Warbler, and California Condor.		Ken Kurtz
16727	1	SCOPE - Scope	the post-2026 process must be much broader in scope than just operational guidelines and strategies for the two major reservoirs.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	7	SCOPE - Scope	Reclamation should define the system (for example, in "system vulnerability") to encompass more than just infrastructure. The Colorado River system includes the built and natural environments, including the tributaries and lands and cities outside the basin that rely on its water. Reclamation should extend the geographic scope of its analysis to extend upstream beyond the full pool of Lake Powell.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	8	SCOPE - Scope	In June 2022, Commissioner Touton testified before the U.S. Senate Committee on Energy and Natural Resources and called on water users across the Basin to take actions to prevent the reservoirs from falling to critically low elevations. Interior officials have noted that "Every sector in every state has a responsibility to ensure that water is used with maximum efficiency." The post-2026 guidelines should contemplate water use reductions from every sector in every state, including the Upper Division States (provisional reports indicate that Upper Basin use in 2021 was 0.5 MAF lower than it was in 2020; compensating Upper Basin users presumably could generate similar reductions in the future).	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann

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16727	10	SCOPE - Scope	Section 3.10 of the draft SEIS ("Visual Resources") notes the potential for "Broader landscape modifications from reduced water availability, including in irrigated, agricultural landscapes within the Lower Division States." The geographic scope of the post-2026 guidelines should include landscapes irrigated with Colorado River system water within both the Upper and Lower Division States - including irrigated municipal landscapes likely affected by reduced water availability. The ecosystems that depend on runoff from these irrigated municipal and agricultural landscapes - notably the Salton Sea - will clearly be affected by the post-2026 guidelines and should be included in the analysis.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	12	SCOPE - Scope	We urge Reclamation to broaden the scope of the proposed action to include the full spectrum of potential local, state, and federal actions that could decrease Colorado River use (assuming that federal funds could help support local and state actions).	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16727	14	SCOPE - Scope	The Secretary of the Interior's authorities extend well beyond her role as River Master for the Lower Basin. A focus on the Lower Basin and coordinated reservoir operations would implicitly reflect the Upper Basin's contention that the Colorado River crisis is solely a Lower Basin responsibility. This will lead to limited solutions that will not solve the problem. The Basin has moved forward through negotiations and compromises and partnerships. Exacerbating divisions and picking sides will ensure crisis and litigation and failure.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann
16804	4	SCOPE - Scope	Thus, we suggest the Post 2026 Guidelines should have a temporal scope of two decades or more, following the model of the 2007 Interim Guidelines. This would also have the benefit of reducing uncertainty for water rights holders throughout the basin, effectively lowering one of the barriers for conservation investments.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16804	6	SCOPE - Scope	In addition to considering a broader range of hydrologies and response options, we suggest the Post 2026 Guidelines should be broader in scope than reservoir operations, as initially outlined in the 1970 LROC. The prolonged drought in the Colorado River Basin has illuminated several other critical vulnerabilities that intersect with reservoir operations to undermine long-term sustainability and predictability, which can be addressed to varying degrees in the development of the Post 2026 Guidelines.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
17202	13	SCOPE - Scope	In response to the Post-2026 NOI's request for "how the purpose and the elements of the 2007 Interim Guidelines should be retained, modified or eliminated to provide greater stability to water users and the public....." CREDA recommends that the need for stability is critical not only for water users and the public, but specifically for power users of the Colorado River system, many of whom are rural and tribal communities, and all of whom are long-term contractors for this important renewable resource that is critical to the energy security and clean energy transition taking place in the American West. The four initial elements should incorporate the hydropower resource alongside references to water storage, delivery, and use.	CREDA Colorado River Energy Distributers Association	Leslie James
17241	16	SCOPE - Scope	The geographic scope of the action alternatives need not be limited to the scope of the 2007 guidelines, but rather should be defined as necessary to accomplish the purpose and need. The geographic scope of the impact analyses must be broad enough to capture effects wherever they occur, including at resources reliant on Colorado River water and "downstream" from Colorado River water uses, such as the Salton Sea (downstream from irrigated agriculture in the Imperial Valley) and the Cienega de Santa Clara (downstream from irrigated agriculture in the Wellton-Mohawk Irrigation and Drainage District).	National Audubon Society	Jennifer Pitt
17241	29	SCOPE - Scope	The 2007 guidelines were given a temporal scope of 20 years, with a built-in provision for re-consultation if the water surface elevation at Lake Mead dropped below 1025' msl. History shows that the federal government, Colorado River Basin states, and water users found it necessary to adopt management measures to supplement the 2007 guidelines before the re-consultation provision was triggered, due to concerns about rapidly declining water storage. Audubon suggests that post-2026 guidelines include provisions for a regular process for assessing their adequacy during the period they are in effect. That could be incorporated as an expected, calendared assessment, or as a trigger for assessment such as the volume of water in system storage.	National Audubon Society	Jennifer Pitt
20341	3	SCOPE - Scope	(3) employ an accurate geographic and temporal scope of analysis that captures reasonably foreseeable direct, indirect, and cumulative significant effects, including short-term and long-term effects, of implementing the new Operational Guidelines across local, regional, national and global contexts, as appropriate, and	Imperial Irrigation District	Shields, Tina L
20341	13	SCOPE - Scope	Reclamation needs to ensure that the EIS assesses reasonably foreseeable significant effects by using an accurate geographic and temporal scope and consistently assessing cumulative effects. Reclamation should bear in mind that the White House Council on Environmental Quality ("CEQ") currently proposes to expand the definition of "effects" resulting from a proposed action in the NEPA regulations to clarify that the effects to be analyzed in NEPA reviews include ecological, social, and economic considerations, including disproportionate and adverse effects on communities with environmental justice concerns, whether direct, indirect, or cumulative, as well as climate change-related effects, including the contribution of a proposed action to climate change, and the reasonably foreseeable effects of climate change on the proposed action.	Imperial Irrigation District	Shields, Tina L

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20341	14	SCOPE - Scope	Reclamation needs to ensure that the temporal and geographic scopes employed in the EIS accurately and fully encompass the reasonably foreseeable direct, indirect, and cumulative significant effects, including short-term and long-term effects, of implementing the new Operational Guidelines across local, regional, national, and global contexts, as appropriate.	Imperial Irrigation District	Shields, Tina L
20341	15	SCOPE - Scope	In terms of geographic scope, the analysis should include the Imperial Valley and extend to the Salton Sea given IID's large entitlement, the runoff and hydrologic connection to the Colorado River, the area's lack of an alternative water supply, and the socioeconomic value of agriculture to rural and disadvantaged communities who would be acutely affected by any water curtailments. Because the Imperial Valley is entirely dependent on the Colorado River, any reduction in water deliveries will cause environmental consequences that result from reduced farming and exposed fields, and lead to job losses for a socio-economically sensitive Environmental Justice community. Effects to the Salton Sea also should be evaluated and discussed. Reduction in water deliveries could quickly expose large areas of the Salton Sea playa, outpacing current mitigation and restoration activities intended to forestall this outcome and address environmental and public health concerns.	Imperial Irrigation District	Shields, Tina L
20341	16	SCOPE - Scope	With regard to the temporal scope, the post-2026 term analyzed in the EIS needs to provide for long-term planning certainty. For example, the 2007 Interim Guidelines had a 20-year term (through 2026), but in hindsight did not include sufficient actions to address system risk. The term of the post-2026 Guidelines therefore needs to be of sufficient duration to establish long-term planning certainty, but the post-2026 Guidelines should also include adaptive management tools to address foreseeable and anticipated variability of supply-demand imbalances and variable hydrological and meteorological conditions.	Imperial Irrigation District	Shields, Tina L
20355	13	SCOPE - Scope	Duration of the Post-2026 Operating Plan During the Post-2026 period, river operations must remain responsive to the pace and severity of the impacts of climate change on the river's hydrology. Under current circumstances, it would be imprudent to commit to an operating plan with a duration longer than 10 years.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20385	9	SCOPE - Scope	Additionally, the NEPA process needs to include specific analysis to streamline upper watershed projects intended to improve forest and rangeland health across multiple federal agencies.	Arizona Farm Bureau Federation	Ana Kennedy Otto
20417	9	SCOPE - Scope	We strongly believe that for Reclamation to achieve its stated goals with post-2026 guidelines and strategies, these next steps in the EIS process must be broad, inclusive, and move well beyond operations at Lake Powell and Lake Mead, to include reservoir management in the Upper Colorado River basin and federal and other programs across the entire basin that affect river resources and contribute to more flexible river management.	Western Resource Advocates	Bart Miller
20417	14	SCOPE - Scope	Finally, with respect to the scope of analysis, Reclamation identifies three elements in the Notice of Intent. WRA maintains that the affected area should be the entire Colorado River Basin, including the mainstem and tributaries, and not just the areas directly affected by operation of Lake Powell and Lake Mead. Also broadly, the geographic scope should extend the entire length of the Basin, including all seven Basin states and Mexico. A reasonable time horizon or term may be 20 years like the 2007 Guidelines expiring in 2026, but with structure built in to adaptively manage, rethink, and adjust the new guidelines as needed during the new defined interim period.	Western Resource Advocates	Bart Miller
20417	27	SCOPE - Scope	If the scope of its analyses were holistic, Reclamation could consider where and how it manages all the storage accounts. Reclamation should embrace detailed operational rules for Lake Powell and Lake Mead, but also consider other reservoirs in the system. If storage accounts are not limited to Lake Mead, for example, then where they are "stored" could have positive implications for environmental resources. Similar to the combined storage management idea above, if Reclamation started to think more holistically regarding where and how it stores water, not only could it satisfy compact delivery requirements, but it could benefit key reaches of the river along the way. NEPA analysis for the post-2026 guidelines could even look at the impacts of identifying or mandating a certain acre-foot amount for release from Glen Canyon Dam and/or Hoover Dam every year for environmental purposes downstream in the US and Mexico.	Western Resource Advocates	Bart Miller

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20438	31	SCOPE - Scope	d. Whether and how Upper Basin reservoirs will be utilized in Basin management systems; and	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	32	SCOPE - Scope	e. Whether, when, and under what authorities reductions in consumptive uses may be planned in the Upper Basin,	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20465	1	SCOPE - Scope	The unprecedented hydroclimate extremes observed not only in the Colorado River Basin but also in other western watersheds during the term of the present Interim Guidelines point out the limits of our climate and weather prediction ability. Accordingly, our recommendations for the post-2026 guidelines include shortening their term from the 15- year period used in the present guidelines and/or strengthening their provision for mandatory consultation and a potential re-opener when worsening hydrologic conditions point to impacts that would be difficult to mitigate.	California Department of Water Resources	Karla Nemeth
20471	2	SCOPE - Scope	B. The scope of the Bureau's analysis should not be constrained by the scope of prior analyses, nor should it be limited to the Lower Basin when the goal is a sustainable River system as a whole. Prior analyses should not limit the scope of the current proceedings. For example, Alternative 1 and Alternative 2 from the Draft Supplemental Environmental Impact Statement (DSEIS) for Near-term Colorado River Operations released in April 2023 (and later withdrawn) should not inform the current process. Additionally, although the scoping process and operating experience under the 2007 Colorado River Interim Guidelines and the 2019 Colorado River Drought Contingency Plan should inform the development of post- 2026 plans, the Bureau's post-2026 analysis should not be limited to that scope, as these agreements will no longer be in place in 2026. Finally, the existing Colorado River Simulation System modeling cannot drive development of alternatives alone.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20472	2	SCOPE - Scope	*See full letter for details on what aspects of the Salton Sea should be analyzed in the EIS. In the 2003 draft SEIS review of current Colorado River policy, Reclamation analyzed socioeconomic and agricultural impacts to the Salton Sea region but did not analyze the air quality impacts, water quality impacts, nor impacts on habitat, nor on environmental justice, nor impacts to the local Tribes. Reclamation also did not conduct a Clean Air Act conformity analysis, nor analyze impacts on the Salton Sea under the Clean Water Act. These analyses need to be part of the Colorado River Basin Post 2026 EIS because the Salton Sea region is deeply impacted by changes to Colorado River management policy.	The EcoMedia Compass	Tom Sephton

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20474	1	SCOPE - Scope	See attachments to Letter #20474 for different restoration methods for the Salton Sea and potential impacts to the Colorado River. Can restoration of these regions add more water to Lake Mead and Lake Powell? We believe the answer is yes, but the Salton Sea needs to be included in the assessment of the whole network. The carbon impact of Salton Sea drying out and Hoover Dam and others being shut off is too severe.	Agess, Inc.	Nathan White
20480	1	SCOPE - Scope	Our agencies support the letters submitted by the Colorado River Basin States and Lower Division States, and also ask that the scope of the Environmental Impact Statement (EIS) for the Post-2026 Operational Guidelines and Strategies and proposed federal action ensure sufficient water for public health, safety and welfare, protect Intentionally Created Surplus (ICS) created under the 2007 Record of Decision entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations For Lake Powell and Lake Mead (2007 Guidelines), provide for continued incentives to add conserved water to Lake Mead, address the imbalance between supplies and demands in the Colorado River Basin, an imbalance to which evaporative and system losses contribute and include a framework that incentivizes voluntary conservation, augmentation, and exchange.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	5	SCOPE - Scope	II. Scope of Post-2026 EIS As described above, the scope of the Post-2026 EIS should address operations of Lake Powell and Lake Mead, particularly water releases, water deliveries, and conservation associated with those two reservoirs. These concerns will be substantial enough that the scope must be limited if we are to succeed.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	25	SCOPE - Scope	IV. Term The Post-2026 EIS must evaluate a term that is sufficient to enable investments in new technologies and augmentation programs. However, the term must also be limited to allow water managers to evaluate and respond to climate change, the operational experience gained from implementation of new operations and programs, and other changing circumstances.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	12	SCOPE - Scope	Term/Timeline - The post-2026 Guidelines' term must remain interim. The history of Colorado River management demonstrates that actions authorized in perpetuity are inadequate at addressing the evolving conditions, needs and values of the Basin. The appropriate term for the interim period depends on the policies and tools that are to be included in the guidelines. It must be long enough to accomplish the operational and planning stability that forms the basis of the Bureau's actions. It must also be of sufficient duration to allow the Colorado River community to gain experience with the tools and practices that will comprise the guidelines. Finally, the term must help provide the confidence needed to incentivize investments in durable practices and resilience building efforts for the benefit of the Basin. However, the interim period must also be informed by what will promote agreement and have the greatest level of support within the Basin. Because such a term cannot be readily definable at the scoping phase, the NEPA analyses should include a variable range of term durations to consider, including the option for multi-decadal duration with interval and meaningful check-ins to adapt the strategies as needed. The Bureau can then pinpoint the preferred interim period based on the results of that analysis and a better understanding of the tools and practices to be considered.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	13	SCOPE - Scope	Geographic Scope - The geographic scope involves two different considerations. First is the scope of the federal action. The 2007 Interim Guidelines' scope was limited to the mainstem from Lake Powell to the U.S. border with Mexico. However, the actions needed to preserve the guidelines and meet the needs of the Basin exceeded that geographic scope to include water sharing agreements with Mexico, the Upper Basin's Initial Units from the Colorado River Storage Project, and voluntary system conservation activities throughout the Basin (i.e., Treaty Minutes, 2019 Colorado River Drought Contingency Plans, and Emergency Measures in 2021 and 2022). Going forward, the geographic scope of actions must be comprehensive enough to incorporate the full breadth of operations and strategies, wherever they are located, that will be needed to accomplish the purpose and need for the post-2026 Guidelines. For any actions deemed relevant but beyond the Bureau's purview for this NEPA process (actions covered under separate regulatory decision process -- i.e., Treaty, NEPA, ESA, CWA, GCPA, etc. -- or that involve discretionary regional, Tribal, or state authorities, or individual, voluntary actions), the Bureau should still recognize the action(s) and detail how the practices and procedures for those actions will be tiered to or coordinated with the post-2026 Guidelines. Second is the geographic scope of analysis. The Bureau's environmental impact analysis must be broad enough to consider the wide range of possible future conditions and strategies to provide operational and planning clarity, and granular enough to identify the reasonably foreseeable impacts of any proposed activities wherever they may occur - i.e., connected tributaries and watersheds, downstream of CRSP facilities, Grand Canyon, Salton Sea, Mexico, groundwater resources, economies at the local, state, Tribal, and regional scale. Comments on the "affected areas" below further clarify the extent needed for the scope of the analysis.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	18	SCOPE - Scope	v. Salton Sea. The Imperial Valley's participation in innovative Colorado River strategies is imperative to the successful development of workable solutions to a dwindling water supply in the Basin. Such participation, however, will only be secured by identifying a workable path for addressing the impacts to public health and wildlife associated with reduced flows to the Salton Sea. The post-2026 NEPA analysis should identify any impacts to the Salton Sea, including biological resources and air quality changes expected from changes to shoreline dust emissions, as the basis for mitigation discussions.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	28	SCOPE - Scope	ii. Looking beyond Lakes Powell and Mead: Proposed operations and strategies that go beyond coordinated operation of Lake Powell and Lake Mead to consider alternative paradigms, e.g., basing reservoir operations on combined reservoir or system storage, should be explored.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	24	SCOPE - Scope	Geographic Scope of the Process If DROA or DROA like flows are to be continued beyond 2026, then NPS would urge Reclamation to expand the geographic scope to include the affected segments of river in the Upper Basin above Lake Powell. NPS recommends analyzing the coordinated operations of Upper Basin Colorado River Storage Project (CRSP) Act reservoirs (especially Flaming Gorge Reservoir) in your analysis. This would allow for consideration of the full environmental effects of multi-year hydrologic scenarios and management actions and may reveal opportunities to optimize basin-wide effects on resources, recreation, and water delivery. We recommend that the Aspinall Unit not be included in future DROA or DROA-like flows given the lack of sufficient storage in that reservoir to play a significant role in the larger system and the negative impacts to recreation and resources on the Curecanti NRA and Black Canyon of the Gunnison NP park units from the effects of greater fluctuations in water levels there.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	40	SCOPE - Scope	Reduced flow variability is a concern upstream in the Upper Basin as well. If DROA or DROA-like flows continue, NPS urges analysis of resource effects on the Green River in Dinosaur and Canyonlands, and on the Gunnison River in Black Canyon / Curecanti. Dam operations under DROA can have the effect of dampening interannual variation between wet and dry years, with increased storage in wet years and larger releases in dry years both resulting in dam releases that mimic a moderate hydrologic classification. The effects of reduced interannual variability under multiple years of such flows should be carefully analyzed with the intent of avoiding undesirable impacts to riparian vegetation and channel geomorphology. Deleterious impacts of extended flow homogeneity include invasive vegetation establishment, streambank armoring, channel simplification and narrowing, and loss of habitat complexity (Graf 1978, Andrews 1986, Lyons et al 1992, Allred and Schmidt 1999, Grams and Schmidt 2002, Walker et al 2020, USBR 2006, Grippo et al. 2017).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20510	1	SCOPE - Scope	*See full text of Letter #20510 for details on why the Salton Sea and its restoration should be included in the Post-2026 operational guidelines and strategies for the Colorado River. Any action alternative for the Post-2026 Program that effectively addresses the Colorado River's chronic supply-demand imbalance by reducing water allotments for Lower Basin stakeholders including Salton Trough water users will necessarily compound and worsen the ongoing harmful effects of freshwater deprivation on the Salton Sea, the lake's wildlife, and people throughout the surrounding region. The ultimate outcome of such federal action will be complete destruction of the Salton Sea ecosystem, devastating impacts on hundreds of species including ones that are already at risk of extinction, and a public health catastrophe. The federal government is legally obligated to avert that disaster by avoiding or minimizing the foreseeable and significant negative impacts of federal actions to the greatest feasible extent, in compliance with the National Environmental Policy Act (NEPA),11 the NEPA implementing regulations,12 and other applicable statutes, regulations, and policies. The only way for the federal government to satisfy those crucial legal obligations over the long term is to accomplish permanent Salton Sea restoration as part of the Post-2026 Program.	Stout Research Center	Jenny E. Ross
20738	9	SCOPE - Scope	This.commitment must extend to the reaches of the River below Imperial Dam-which includes the portion of the River flowing through our Reservation - that were excluded from the environmental analysis in the EIS for the 2007 IGs and again in this spring's now-withdrawn (but apparently soon to be reissued in modified form) draft Supplemental EIS (DSEIS).	Quechan Indian Tribe	Jordan Joaquin

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20785	1	SCOPE - Scope	*See full text of Letter #20785 for full proposal for inclusion of the Salton Sea in the Post-2026 Operational Guidelines and Strategies. Since I respectfully urge the members of the Bureau of Reclamation / Department of the Interior to include the Salton Sea in consideration for the Development of Post-2026 Operational Guidelines and Strategies, it is important that members are informed about unnormal situation and the reason that stagnate the process of the restoration of the Salton Sea.	Geothermal Worldwide, Inc.	Nikola Lakic
20817	11	SCOPE - Scope	The scope of the NEPA process for the Post-2026 Operations should be narrow. The NOI states that new guidelines for Post-2026 Operations will focus on the operation of Lake Powell and Lake Mead. As such, Post-2026 Operations should focus only on those topics necessary to sustainably manage water supplies at Lake Powell and Lake Mead. Post-2026 Operations cannot modify operations at the other Initial Units built under the Colorado River Storage Project Act and cannot modify the respective records of decision that govern each of these reservoirs.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	15	SCOPE - Scope	The Post-2026 Operations must be interim in duration. This will allow Reclamation and the Basin States to gain valuable operating experience under operations that respond to actual hydrology and rebuild and protect storage in Lake Powell and Lake Mead. An interim period would also improve the basis for making additional future operational decisions, whether during the new interim period or thereafter. Finally, an interim period would allow for opportunities to continue to adapt to climate change and other unforeseen circumstances.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	4	SCOPE - Scope	If the preferred alternative for this EIS resembles the failed strategies of 2007, 2014, 2019, and 2021, then it is very reasonable to expect that the Record of Decision for the Post-2026 Operations will expedite system collapse and provoke public ire. We hope that this Post-2026 EIS process will be more robust and transparent than the NEPA reviews Reclamation has undertaken in the past. The scope of the analysis should be basin-wide and include Upper Basin dams that Reclamation has used to manage water shortages at Lakes Mead and Powell per the 2007 Interim Agreements and other agreements. Reclamation must start with a baseline that takes into account the water needed to preserve the ecosystem, endangered fish recovery, structural deficits due to evaporation and seepage, and reserved tribal water rights. A NEPA analysis of this sort fully considers alternatives that may include decommissioning existing dams to reduce water loss and impacts to the environment.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	5	SCOPE - Scope	The analysis cannot be limited to operations of Glen Canyon Dam and Hoover Dam because those operations and contingency measures also involve the Bureau of Reclamation's operations at Flaming Gorge Dam, Blue Mesa Dam and Navajo Dam, which are utilized to avoid system risk and uncertainty. For example, in recent years changes in operations at these upper basin dams have been used to prevent the outlet works at Glen Canyon Dam from declining below targeted levels to shore up hydropower operations and protect equipment.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	21	SCOPE - Scope	We urge the Bureau to embrace the following suggestions for the upcoming NEPA process: 2. The scope of the analysis must be comprehensive, programmatic and basin-wide in scope (including Upper Basin dams and the counties with trans-basin and intra-basin diversion projects in existence and new proposals).	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20912	10	SCOPE - Scope	Finally, we point out environmental impact analysis must take into consideration impacts to Salton Sea or nearby wildlife reserve due to major curtailments in water deliveries to Imperial Irrigation District (IID) customers.	Imperial Valley Water (IVH20)	Stephen Benson

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20913	8	SCOPE - Scope	Even with the significant efforts to prop up Lake Powell, the Drought Response Operations Agreement (DROA) acknowledges that these efforts may not be enough to avoid dropping below minimum power pool. Line 45327 of the DROA document states that "if dry conditions persist or worsen, available storage volumes for potential adjustments or releases may be insufficient to protect the Target Elevation at Lake Powell. As such, Drought Response Operations may be ineffective and therefore futile." In February of 2023, Reclamation hosted a webinar describing possible alternatives to re-engineer Glen Canyon Dam so that it may provide limited hydropower generation and continue delivering water at lower levels28. The effort by Reclamation to have a discussion demonstrates there is an urgent need to begin the process of modifying Glen Canyon Dam. If the Colorado River is to survive the decades to come, we have to think about more than salvaging some hydropower at Glen Canyon Dam. Reclamation's ongoing efforts to study the structural modification of Glen Canyon Dam must be incorporated into the analysis and process of the Post-2026 Operational Guidelines. The implications of structural modifications should be vetted thoroughly, especially in consideration to its effects on the environment. Both upstream of the dam in Glen Canyon and downstream in Grand Canyon National Park.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	19	SCOPE - Scope	Term of Guidelines The Post-2026 EIS should consider a sufficient term to gain operational experience from implementation of new operations, changing circumstances, and potential future programs but not a length where it becomes difficult to adapt to changing circumstances.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20923	7	SCOPE - Scope	The post-2026 guidelines should be limited to the operation of Lake Powell and Lake Mead. The Colorado River District is concerned that the statement in Reclamation's June 16, 2023, Scoping Notice concerning "alternative paradigms, e.g., basing reservoir operations on... system storage" could be misconstrued to contemplate the analysis and adoption of guidelines that consider storage facilities in the Upper Basin other than Lake Powell. While the post-2026 guidelines must adopt bold and meaningful changes to existing operations, the actions must be limited to storage and release operations at Lake Powell and Lake Mead (consistent with, and as correctly identified by, the title of Reclamation's Scoping Notice: "Notice of Intent... on the Development of Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.").	Colorado River District	Peter Fleming
20925	10	SCOPE - Scope	Any new set of guidelines needs to consider the model established under the QSA for addressing environmental impacts to the Salton Sea that may be caused by additional conservation or other potential measures to maintain levels in Lakes Mead and Powell. The federal government, through the NEPA process, needs to acknowledge responsibility for any environmental impacts that would be associated with addressing the drought on the river and provide the necessary funding to cover costs of mitigation. The Water Authority, together with its partners in the QSA Joint Powers Authority (JPA), has met and continues to meet all its environmental mitigation obligations under the QSA, and the collaborative efforts of the QSA JPA should stand as an example for others.	San Diego County Water Authority	Dan Denham
20927	2	SCOPE - Scope	Specifically, the Secretary of the United States Department of the Interior is vested with the re ponsibility of managing the mainstream of the Colorado River in the Lower Basin pursuant to Federal Law. In contrast, the Upper Basin states have the exclusive right and power to regulate waters within their boundaries, including the appropriation, use, and control of the water as apportioned by the Colorado River Compact and the Upper Colorado River Basin Compact. The scope of the EIS should be limited to the operation of Lake Powell and Lake Mead and must not analyze alternatives involving the operation of Colorado River Storage Project Act (CRSPA) reservoirs upstream of Lake Powell. These upstream CRSPA reservoir operations are governed by applicable records of decision (ROD) that must not be impacted by this EIS. The EIS should not include alternafives involving balancing releases from Lake Powell that could reduce water supply available to the Upper Basin, or limit the intent and ability of the CRSPA reservoirs upstream of Lake Powell to provide maximum certainty of water supply available to the Upper Basin.	Front Range Water Council	Alan Salazar
20927	8	SCOPE - Scope	The EIS should contemplate neither the reduction of beneficial uses within the Upper Basin nor limiting Upper Basin depletions to current levels.	Front Range Water Council	Alan Salazar
20931	7	SCOPE - Scope	A more holistic operational strategy for the Colorado River system that accounts for storage contents in other Colorado River Storage Project reservoirs may be more effective than an approach focusing primarily on adjusting releases from Lake Powell to Lake Mead.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20932	8	SCOPE - Scope	The Post-2026 Operations must be interim in duration. This will allow Reclamation and the Basin States to gain valuable operating experience under operations that respond to actual hydrology and rebuild and protect storage in Lake Powell and Lake Mead. An interim period would also improve the basis for making additional future operational decisions, whether during the new interim period or thereafter. Finally, an interim period would allow for opportunities to continue to adapt to climate change and other unforeseen circumstances.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft

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20932	9	SCOPE - Scope	The scope of the NEPA process for the Post-2026 Operations should be narrow. The NOI states that new guidelines for Post-2026 Operations will focus on the operation of Lake Powell and Lake Mead. As such, Post-2026 Operations should focus only on those topics necessary to sustainably manage water supplies at Lake Powell and Lake Mead. Post-2026 Operations cannot modify operations at the other Initial Units built under the Colorado River Storage Project Act and cannot modify the respective records of decision that govern each of these reservoirs. Other issues, such as unresolved Tribal water rights, endangered species, and other environmental issues and concerns, should be addressed through other established programs, processes, and frameworks.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20936	2	SCOPE - Scope	To the extent feasible, the EIS should address the operations of the entire Colorado River System. Ideally, a global approach addressing the operations of the entire Colorado River System under a single process to coordinate Endangered Species Act issues, natural, recreational, and cultural resources concerns. Upper Basin reservoir operations would be preferable to what currently exists; an assortment of Record of Decisions ("RODs"), programs, and plans that all impact operations but have been developed separately with different scopes and operate on different timelines.4 The Community acknowledges that it would be impractical to revisit all of these agreements, but to the extent possible, Reclamation should strive to develop an EIS that addresses the operations of Lake Mead and Lake Powell by using all available water supplies in reservoirs operated by Reclamation, including available supplies in the "Initial Units" under the Colorado River Storage Project Act (70 Stat. 105). This would continue the operations that have been incorporated in the DCPs, allowing for releases from the Initial Units when water is available in them and need to shore up critical elevations at Lakes Mead and Powell.	Gila River Indian Community	Stephen Lewis
20938	8	SCOPE - Scope	Scope of Post-2026 Operations The NOI limits the Post-2026 Operations to guidelines and strategies for Lake Powell and Lake Mead. Utah agrees that the scope of the Post-2026 Operations should be strictly circumscribed to managing water supplies at Lake Powell and Lake Mead and coordinating operations between the two reservoirs. Operations that seek to modify the management of the upstream Initial Units or other Colorado River facilities are beyond the scope of the EIS. Likewise, the Post-2026 Operations may not modify, limit or otherwise interfere with the state of Utah's authority over the regulation, distribution and management of its Colorado River system water. Moreover, environmental issues and concerns, such as those related to threatened and endangered species, are beyond the scope of this NEPA process and instead should be addressed through established programs and processes. Similarly, Utah is supportive of projects, particularly those in the Lower Basin, that increase water supply. However, we do not believe that this EIS is the appropriate forum to analyze specific augmentation projects. Finally, the duration of the Post-2026 guidelines should be limited. The guidelines should be interim to allow for modification due to unforeseen circumstances that are beyond the ability of the guidelines to adapt, yet of sufficient duration to provide certainty and stability to Colorado River water users.	Colorado River Authority of Utah	Betsy Coleman
20945	13	SCOPE - Scope	The NOI recognizes that guidelines and strategies for Post-2026 Operations will pertain to operations of Lake Powell and Lake Mead. As such, those guidelines can only focus on hydrologic conditions impacting Lake Powell, storage conditions, and releases at Lake Powell and Lake Mead subject to the existing legal framework. They cannot modify operations at the other Initial Units built under the Colorado River Storage Project Act, including the respective records of decision that govern each of these reservoirs.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	15	SCOPE - Scope	Any assumption of reductions in use or curtailment in the Upper Basin is beyond the scope of this process.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	19	SCOPE - Scope	Guidelines for Post-2026 Operations must be interim in duration.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20947	2	SCOPE - Scope	Basinwide operations of federal dams are inextricably linked to the conditions at Hoover Dam, and especially, Glen Canyon Dam. The geographic scope of this planning process should include impacts to restored sections of river upstream of Lake Powell. Operations of upstream basin reservoirs (e.g., Blue Mesa Reservoir, Navajo Reservoir and Flaming Gorge Reservoir) have a great effect on tributaries and river reaches with important recreational values. The scope should broaden to analyze coordinated reservoir management impacts on downstream recreation and environmental values. Including these basinwide operations as a part of this process would help to replace the agreements made as a part of the expiring Upper Basin Drought Contingency Plan. This current process provides a valuable opportunity to look holistically at management basinwide and plan for operations that have the least potential to negatively impact environmental and recreational values of the watershed.	American Whitewater	Kestrel Kunz
20952	7	SCOPE - Scope	* Analyze potential impacts to air quality, water resources, and other environmental resources resulting from changes to water management or deliveries, including in the Salton Sea region of California.	Environmental Protection Agency Region IX	Robin Truitt

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20952	16	SCOPE - Scope	Because implementation of a variety of conservation actions, like increased reuse, will require an all-of- government approach to respond to changing hydrological conditions, the EPA recommends that the Draft EIS present a conceptual framework for continual engagement and participation of all seven states and Basin tribes to adopt innovative ideas, effective regulations and management practices, including an outline of action items needed to achieve common goals and objectives. In the Draft EIS, evaluate the effectiveness of existing programs and preserve those robust measures or mechanisms that are available to provide greater stability to water and energy systems. Clearly identify Reclamation's commitment to continue to initiate and participate in cooperative processes at the federal, state, tribal and local levels because Reclamation's actions alone will be insufficient to meet the needs of all water users. For example, the EPA encourages a partnership with the Natural Resources Conservation Service which could provide technical assistance and financing necessary to develop more efficient drinking water, wastewater, and energy systems, and implement rural development programs that reduce total water use, especially in the agricultural sector. Similarly, the USDA's Farm Service Agency has a Conservation Reserve Program that might provide a model for agricultural demand reduction, and the collaborative efforts of 100 organizations have resulted in a National Water Reuse Action Plan Outline in the Draft EIS which types of state activities could be best supported by project operations. EPA recommends that the Draft EIS compile or reference existing actions that address supply-side and demand-side response actions in both the Upper and Lower Colorado River Basins. Moreover, EPA is aware that many communities are interested in potential sources of funding or grant opportunities for drought relief or infrastructure investments from the Inflation Reduction Act, Bipartisan Infrastructure Investment and Jobs Act, and Reclamation's WaterSMART Grants Program; information about these funding sources and interested communities would be helpful to include in the Draft EIS to foster future partnerships.	Environmental Protection Agency Region IX	Robin Truitt
20963	8	SCOPE - Scope	Perform a comprehensive analysis: All indications are that the Basin's hydrology will not improve anytime soon. Accordingly, the next Colorado River management framework cannot simply focus on short-term efforts to stabilize the system. It must also promote the long-term sustainability of the Basin's communities and natural environment in the United States and Mexico.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20965	2	SCOPE - Scope	In the 2003 draft SEIS review of current Colorado River policy, Reclamation analyzed socioeconomic and agricultural impacts to the Salton Sea region but did not analyze the air quality impacts, water quality impacts, nor impacts on habitat, nor on environmental justice, nor impacts to the local Tribes. Reclamation also did not conduct a Clean Air Act conformity analysis, nor analyze impacts on the Salton Sea under the Clean Water Act. These analyses need to be part of the Colorado River Basin Post 2026 EIS because the Salton Sea region is deeply impacted by changes to Colorado River management policy.	The EcoMedia Compass	Andrew McDonagh
20973	7	SCOPE - Scope	Determine and analyze the full geographic scope of the proposed action. The Service recommends that Reclamation consider any interrelated and/or interdependent actions in the post-2026 operations analyses, to help determine the appropriate action area for analyzing effects. For example, if operating guidelines tie into water released at other dams and lakes to address shortages at Lake Powell or Lake Mead, the Service recommends including those areas and analyzing the full scope of environmental effects.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	18	SCOPE - Scope	Analysis of shoreline impacts at Sonny Bono Salton Sea NWR, including assurances that dust mitigation will be completed in a timely fashion and will not be the responsibility of the refuge. Also please determine if water reductions to the Imperial Irrigation District will have any impact on the refuge's ability to access its water right of 8,000 acre-feet annually.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20982	1	SCOPE - Scope	o Analyses should be limited geographically to the operation of Lake Powell and Lake Mead.	Southwestern Water Conservation District	Steve Wolff
20984	1	SCOPE - Scope	I am writing to urge you not to forget the Salton Sea in your planning for the uses of Colorado River water after 2026. I understand that the river has been over-allocated for many years, and that big cutbacks will be necessary to preserve Lake Mead and Lake Powell, and to insure that all the states, tribes and Mexico have their fair share of the water that is truly available. However, the decline of the Salton Sea has been underway since 2003 when water was sold/transferred to San Diego and other urban areas from farming in the Imperial Valley. This is part of the historic over allocation of Colorado River water. Promises to restore the Salton Sea were never fulfilled and the current plans of the State of California will only continue the history of postponing action and making only token efforts. We must not forget the Salton Sea in this round of negotiations and planning for the future of water. Our local communities have voted many times in support of importing ocean water to refill the Salton Sea to control the dust that is making our people sick. In addition if geothermal power is used to desalinate large quantities of water this can help provide a new source of freshwater and decouple the Salton Sea from the Colorado River. Importing ocean water to the Salton Sea, and desalinating it can help reduce the emissions of greenhouse gases from the exposed lakebed by restoring a healthy ecosystem at the Salton Sea. In this way we can begin to address the environmental damages caused by our past policies. [attachment not coded; entire attachment is letter previously submitted to USACE for Public Comment on the Draft Long Range Plan for the Salton Sea]		chuck Parker

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20986	3	SCOPE - Scope	1. The scope of the analysis for Post-2026 Operations must be narrow. The scope of the EIS should be limited to the coordinated operations of Lake Powell and Lake Mead. Such a narrow scope will allow Reclamation to thoroughly analyze and compare the alternatives studied in the EIS, while adhering to the ambitious timeline of publishing a Draft EIS by the end of 2024. Operational experience gained from the 2007 Guidelines has demonstrated that this is the proper scope for Post-2026 Operations. In particular, the EIS should not modify the Record of Decision for Navajo Reservoir, or those of the other upstream initial units under the Colorado River Storage Project Act (i.e., Flaming Gorge and the Aspinall Unit).	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20986	5	SCOPE - Scope	The guidelines for Post-2026 Operations must be interim in nature. While the precise length of that interim period is subject to debate, the recent past has demonstrated that we cannot accurately anticipate what hydrology and climate will be in twenty years. We have also learned from the implementation of the 2007 Guidelines that short-term reactive management is very time-consuming and not very efficient. The new guidelines should include periodic reviews (possibly every five years), as well as "offramps" if original assumptions appear unrealistic as time goes on.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20989	4	SCOPE - Scope	Post- 2026 Operations and Guidelines should only be focused on Lake Mead and Lake Powell but in parallel States, Reclamation, and Tribes should be workings on issues related to the Colorado River.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20989	5	SCOPE - Scope	Ute Mountain Ute Tribe... does not believe that the Upper Basin reservoirs should be considered for use in Basin management systems. Second, the UMUT does not believe that reductions in the consumptive use in the Upper Basin should be included in the scope of Post-2026 Guidelines and Operations.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
21081	13	SCOPE - Scope	Tributaries - Particularly in the Upper Basin, tributaries are vital in the health of the overall system and contribute significant water, aquatic habitat connectivity, and support diverse rural communities. As part of the 2026 Colorado River Operational Guidelines, tributaries should be addressed.	Dolores River Boating Advocates	Rica Fulton
21081	15	SCOPE - Scope	Reclamation should address each major Upper Basin tributary with a federal nexus (i.e., communities that receive water from a federal project) individually. By addressing each major tributary individually, it would acknowledge their differences and quantify of shortages they are able to contribute. This would help clarify vague expectations on how individual water users and tributaries need to contribute to the 2-4 million-acre-foot cuts.	Dolores River Boating Advocates	Rica Fulton
21081	16	SCOPE - Scope	Prioritize tributary connectivity to the mainstem Colorado and Green Rivers (both in terms barriers and sufficient streamflow.)	Dolores River Boating Advocates	Rica Fulton
21129	1	SCOPE - Scope	Notwithstanding any other provision of law, in order to fulfill the trust responsibility to the Bands, the Secretary, acting through the Commissioner of Reclamation, shall permanently furnish annually the following: (1) WATER.--16,000 acre-feet of the water conserved by the [Canal Lining Projects] for the benefit of the [San Luis Rey Settlement Implementing Parties] [...] The Secretary and the Assistant Attorney General executed the San Luis Rey Indian Water Rights Settlement Agreement on December 22, 2014, and January 30, 2015, respectively. Section 4.1 of the Settlement Agreement provides that: "As authorized and directed in the Settlement Act, the United States agrees to deliver 16,000 acre-feet per year of Supplemental Water to the [the San Luis Rey Settlement Parties]." On December 16, 2016, Congress approved and ratified the Settlement Agreement among the San Luis Rey Settlement Parties and the United States. See San Luis Rey Settlement Agreement Implementation Act of 2016, WIIN Act of 2016, PL 114-322, SS 3605; S.612 -- 114th Congress (2015-2016). The Settlement Agreement was also approved by the United States District Court for the Southern District of California1 and the Federal Energy Regulatory Commission. The 16,000 acre-feet of conserved Colorado River water provided to the San Luis Rey Settlement Parties pursuant to an Act of Congress and signed Settlement Agreement with the United States cannot be reduced or altered through the current administrative process. This important Settlement benefit is outside the scope of any post-2026 operational guidelines and strategies for Lake Mead and Lake Powell.	San Luis Rey Indian Water Authority	Bo Mazzetti
21142	1	SCOPE - Scope	General Scope of the NEPA Process With respect to the scope of the NEPA process, the Commission urges the Bureau to limit its work to "develop[ing] post-2026 operational guidelines and strategies for Lake Powell and Lake Mead," as described in the June 16th Federal Register notice (Vol. 88 at 39,455). Addressing upstream reservoir operations and/or management of the entire Colorado River Basin will unnecessarily complicate and delay development of an operational plan for Lakes Powell and Mead and may exceed the Secretary's authority in the Upper Basin. As noted in the Bureau's December 2020 "Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead" (at 1), the 2007 Interim Guidelines "provided the opportunity to gain valuable experience for the management of Lake Powell and Lake Mead under modified operations and improve[d] the basis for making future operational decisions ...." Because of the experience gained under the 2007 Interim Guidelines, this NEPA process is appropriately focused on the development of post-2026 operations for Lake Powell and Lake Mead.	San Juan Water Commission	Aaron Chavez

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21302	3	SCOPE - Scope	The purpose and need underlying the 2007 Guidelines focused on three elements: 1. Improving management of the River by considering tradeoffs between the frequency and magnitude of reductions of water deliveries, and considering impacts on Powell/Mead storage, water supply, power production, recreation, and other environmental resources; 2. Providing U.S. mainstream users a greater degree of predictability with respect to annual water deliveries, particularly under drought and low reservoir conditions; 3. Providing additional mechanisms for storage and delivery of Lake Mead water supplies to increase flexibility. See 2007 Record of Decision at p.7 While these three original elements remain valid considerations for the next set of guidelines, circumstances have also changed substantially in the Colorado River Basin since the development of the Guidelines in 2007, as has our understanding of the climate-related challenges we face. To this end, we recommend that those elements should be modified and broadened for the 2026 guidelines process to include the following additional elements. [See comment letter for additional details].	City of Phoenix	Cynthia Campbell
21302	4	SCOPE - Scope	1. Consideration of whole system conditions in determining available water supply/shortages. The determination of volumes available for delivery within the Annual Operating Plan should be based upon the consideration of multiple factors that could provide a more holistic view of system condition, e.g.: a. Whole system storage values. Total system storage (rather than just relative elevations or storage volumes in Lakes Mead and Powell), including at a minimum watershed storage and active storage availability in Mead, Powell, Mohave, Havasu, and the CRSPA reservoirs. b. Near-term water supply/runoff forecasts. Near-term Basin runoff forecasts generated by the Colorado River Forecast Center and 24-month study on total system storage. c. Long-term hydrologic trend. Long-term forecast methodologies that anticipate the potential impact of larger hydrologic trends en a mid-to-long term basis (e.g. 5- to 10-year timeframe). For example, there are well-documented relationships or correlations beiween runoff efficiency and aridification, temperature, dust-onsnow measurements, and the timing and volume of prior year precipitation, as well as correlations between Atlantic and Pacific ocean temperature regimes measured by the AMO/PDO signals and wetter/drier conditions in the Basin, among other signals. d. Expected results of system water supply benefit programs. Investments in projects and programs that create system-level water supply benefits could be incorporated in both near term forecasts (subsection b above) and long-term trends (subsection c above). e. Signposts and triggers. As described in further detail below, key signposts and triggers should be identified as part of the modeling efforts along with related protective response strategies that are necessary or desirable to meet management objectives.	City of Phoenix	Cynthia Campbell
21302	9	SCOPE - Scope	Creation of and response to identified signposts/triggers. Given the uncertainties that exist with climate change and the potential need for swift reactions to changing conditions, the EIS process should lead to the creation and analysis of an adaptive management plan for the Basin that establishes some key signposts and triggers that are correlated with significant water risks, together with potentially effective response actions that could be implemented in the event that such conditions actually occur. By signposts, we refer to indicators chosen that are monitored (e.g. average increase in temperature over baseline) and by triggers, we refer to values of signposts (e.g. 0.3 degree Celsius) that identify when associated response actions should be implemented. Decision making in the Basin is particularly complex with seven states, major municipal and agricultural users, and the country of Mexico all dependent upon the River. As we have observed over the past few years, the pace and scale of changes that could be possible in connection with aridification and less predictable weather patterns can easily overwhelm our usual consensus-driven governance models. Rather than abandon our commitments to collaboration, we should instead work harder to collaboratively define potential courses of action that should be available to Reclamation if and when conditions change. An effective adaptive plan should help to ensure that Basin users have time to initiate necessary decision processes and implement adaptive responses when and if those conditions occur.	City of Phoenix	Cynthia Campbell
21302	11	SCOPE - Scope	Reclamation should not assume that desirable types of transactions will occur in the absence of affirmative federal support, or that individual users will be in a position to mitigate the risks created by Colorado River outcomes on an independent basis as was assumed in Reclamation's 2023 Near-term Colorado River Operations Draft Supplemental Environmental Impact Statement ("SEIS"). This NEPA process provides an opportunity to potentialiy encourage and streamline at least some of those potential transactional and transitional behaviors - by analyzing related operational rules that would facilitate them - in a context in which substantial amounts of federal and state resources are potentially available to assist those efforts. These transactions can provide meaningful mitigation for the inevitable risks that will be associated with any particular approach to Colorado River management. To this end, we would propose that as part of any preferred alternative or identified mitigation, Reclamation should consider including: Analysis of a wider range of potential near-term transactional behaviors that would be supported under new operational rules, in order to reduce the need for extensive NEPA analysis and approval as a near-term obstacle. Establishment of a mechanism within the operational rules that would permit certain kinds of pre-approved transfers between users, helping to avoid the worst impacts whenever reservoir storage is in a critical condition. Establishing a stakeholder process among and between system operators and end users to determine the precise volumes of water necessary to avoid shutting down critical infrastructure like drinking water plants (and avoid undesirable Reclamation interventions that might otherwise be necessary}, and to seek out voluntary solutions to meet those minimums. Protection of tribal interests by committing to accelerated approval of core tribal infrastructure projects related to drinking water access and agricultural efficiencies, including direct investments in capacity needed to plan and carry out projects.	City of Phoenix	Cynthia Campbell

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21302	12	SCOPE - Scope	Upper Basin Reservoirs. Unlike the 2007 Guidelines, the geographic scope of Reclamation's analysis and any alternatives should be expanded to include coordination with other Upper Colorado River Basin reservoirs apart from Lake Powell. There is little question that future climate conditions could depart substantially from the conditions anticipated when the operations of other Basin facilities were originally planned, and Reclamation's operations at Mead and Powell will inevitably have potential impacts on both upstream and downstream facilities that must be analyzed. In this context, consideration of additional coordination and flexibility in storage management, deliveries, and accounting between and among facilities - even if this is undertaken as only a limited supplement to existing analyses or associated Records of Decision - could help to ensure that the water deliveries, flow requirements, and other management constraints at each reservoir can continue to be met over time. Reclamation's authority includes adopting guidelines and coordinated reservoir management strategies to address operations of the Upper Colorado River reservoirs constructed and operated under the Colorado River Storage Project Act (CRSPA), including Glen Canyon,Aspinall Unit (Crystal, Blue Mesa, Morrow), Flaming Gorge, Navajo, and Fontenelle. The 2007 Guidelines were considered guidelines to implement the Operating Criteria developed pursuant to section 602(a) of the Colorado River Basin Project Act of 1968 (CRBPA).1 However, the CRBPA provides authority to propose criteria for the coordinaied iong-range operation of ali CRSPA reservoirs and Lake Mead. Although other existing agreements and operational provisions have been created to govern Upper Basin reservoirs (e.g., the Upper Basin Drought Contingency Plan), a truly coordinated set of operational guidelines can and should include more than Lake Mead and Lake Powell and incorporate greater opportunities for coordinated water management strategies with other Upper Basin reservoirs as part of the new post-2026 Guidelines.	City of Phoenix	Cynthia Campbell
21302	20	SCOPE - Scope	Infrastructure. The scope of analysis should include a thorough assessment of the state of relevant reservoirs and associated issues that could impact other resources. For example, this can and should include an analysis of infrastructure challenges that would be associated with low water levels (e.g. power heads, Lake Powell outlet tubes), loss of storage due to sedimentation, and environmental and infrastructure harm associated with quagga mussel infestations. It is important for Reclamation to fully evaluate and for the Basin's stakeholders to understand the physical infrastructure constraints that may guide water storage and delivery availability in the future.	City of Phoenix	Cynthia Campbell
21302	27	SCOPE - Scope	As part of the NEPA analysis, Reclamation should comprehensively analyze potential impacts from shortages. Phoenix recognizes that the analytical scope of this NEPA process will necessarily be far more comprehensive than one would expect to see from Reclamation's recent SEIS. However, Phoenix is compelled to note that there were multiple instances within the (recently withdrawn) SEIS that did not provide sufficient detail or information to adequately assess either environmental impacts or the likely real social and economic effects of proposed actions and water shortages. We would strongly urge that the EIS treat these issues far more broadly and avoid the substantial deficiencies in analysis exhibited by the SEIS in many areas, including analysis of shortage impacts on water users, the environment, the local, regional, and national economies, and the Colorado River system as a whole.	City of Phoenix	Cynthia Campbell
Form 1	-	SOC - Socioeconomics	Outdoor recreation generates billions of dollars each year, sustaining many local economies. These communities rely on continued recreation access to Lake Powell and Lake Mead for continued economic growth. These communities, which include neighboring Tribal Nations, would suffer significant losses if recreation is lost or decreased due to water elevation levels. NPS estimates that both Lake Mead and Lake Powell produce almost $500 million in direct economic impact to gateway communities, and we estimate that the broader impact is measured in billions. This economic impact positions recreation to provide comparable economic benefit as power generation and agriculture.	Blue Ribbon Coalition	
Form 1	-	SOC - Socioeconomics	I hope BOR will include analysis of the economic importance of recreation in addition to feedback on power generation and water deliveries.	Blue Ribbon Coalition	
125	1	SOC - Socioeconomics	I am small business owner in Page, AZ. I own small boat rental agency Wake Bros Rentals and my family and the family of my employees lives depend on the tourism created by a lake that has water to recreate on. I understand the need for water downstream but water held upstream just makes sense.		Christopher Cleveland
131	3	SOC - Socioeconomics	jobs for thousands of people in and around the lake.		Jen Swenson
135	2	SOC - Socioeconomics	Also they are such an amazing place for recreation and it uplifts the economy in surrounding areas around them. For example, Lake Mead is so important to Las Vegas economy and lively hood. It is so important to have storages in place In case we have continued droughts.		Teanna Beckstead
157	1	SOC - Socioeconomics	The economic impact of Lake Powell extends far beyond the borders of the lake and neighboring towns. Utah, Arizona, and Nevada are some of the best states for recreational boat sales. This boosts not only state and local economies, but the national economy. Not to mention the its effect on real estate, national relevance, and tourism. I personally have benefited from this economic growth.		Todd Kartchner
236	1	SOC - Socioeconomics	I also have a local business in Page Az and only stays in business because of the hotel customers that come and use the lake.		Amy Stewart
461	1	SOC - Socioeconomics	The locals around Page, AZ depend on the tourism and boating on the lake.		Brandy Schimbeck

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494	2	SOC - Socioeconomics	Economic Benefits: The recreational aspects of Lake Powell play a significant role in supporting local economies through tourism and related industries. A vast array of businesses, including hotels, restaurants, marinas, and outdoor equipment rentals, rely on the influx of visitors drawn to the lake's recreational opportunities. Higher water levels sustain these enterprises and provide job opportunities for residents in the region, bolstering economic growth and prosperity.		Matthew Riddle
519	1	SOC - Socioeconomics	It has sustained many people in the communities that surround the Lake and they need this.		Toni McKay
528	1	SOC - Socioeconomics	My small town of hanksville depends on lake traffic and tourism that comes with having this lake at a high capacity for recreational use.		Colton Roberts
595	3	SOC - Socioeconomics	The entire cities sustainability is based off of that marina running. The lake needs to be high enough for THAT marina, not just for Waheap. My grandpa is 94 and we have been going to Lake Powell as a family since the lake was built. My grandpa BUILT a boat and we used to camp. We eventually started staying at the Days Inn in Page. Our friends have invited us to stay on their houseboat. Weâ€™ve shopped at Walmart, been golfing, used the airport, attended religious gatherings, eaten at countless restaurants, etc. But since the lake has been too low for the Antelope Marina, we havenâ€™t been. The lake is TOO LOW for anyone to enjoy. You are killing that city and the people who reside in it.		Brienne Poole
638	1	SOC - Socioeconomics	I know that revenue from our recreation lakes is important to the states and these lakes offer recreation opportunities for so many.		Andrea Ming
660	1	SOC - Socioeconomics	As a resident of Page Arizona, I can say for myself and the countless visitors of the area that Lake Powell is immensely important. Powell is the heart of recreation and tourism for memories, experiences, and economy.		Jeremy Byrom
680	1	SOC - Socioeconomics	.Not only is it a place of incredible memories for my family and friends but far too many people rely on this water source to survive.		Sunnee Goldhardt
682	1	SOC - Socioeconomics	These losses could also result in the loss of tourist dollars for communities that rely on this source of income.		Elizabeth Hamilton-Byrd
1100	2	SOC - Socioeconomics	the river is the life blood of the American West.		Janet Bergamo
1731	4	SOC - Socioeconomics	and people who rely on the Colorado River for their home, livelihoods and their survial as families		JEAN Naples
1927	1	SOC - Socioeconomics	The Colorado River is a national treasure and a major driver of our nation's economy in a wide variety of ways.		Heather Morijah
1949	1	SOC - Socioeconomics	It is also a major driver of the U.S.		Jensen Fiskin
2022	2	SOC - Socioeconomics	and the emergence of new priorities for users of the Colorado River.		Chip Ward
2257	1	SOC - Socioeconomics	It is your moral imperative to protect this particular river: the Colorado River is a national treasure and a major driver of the U.S.		Donna DiMassa
2567	2	SOC - Socioeconomics	The lives of innumerable birds and people depend on your total support to keep this wonderful natural place flowing!		Terry Goodfield
2813	1	SOC - Socioeconomics	Although its beauty and importance as a critical ecosystem to both the US and Mexico can not be over stated, itâ€™s also important economically to the SW US.		Deborah Carter-Drain
2824	5	SOC - Socioeconomics	The West Water wells, which are 35 miles from Grand Canyon West, previously provided all of the water for the Tribe's activities there. But several years ago, the water table in those wells suddenly dropped because of the current long-term drought in the settlement, and both wells failed. Since then, the Tribe has been forced to curtail some of its operations at Grand Canyon West because of a lack of water and has resorted to pumping groundwater near Peach Springs and hauling it by truck to the West Water site, where the water is then pumped to Grand Canyon West. This patchwork system is insecure and very expensive, but it is the only way the Tribe can continue any operations at Grand Canyon West, the centerpiece of the Tribe's economy. Grand Canyon West is vitally important to the economic wellbeing of the Hualapai Tribe. The Hualapai Reservation does not have the natural resources to permit commercial agriculture, timber or mineral development. But the Reservation's virtually unique location on the Grand Canyon gives the Tribe a strong basis to create a self-sustaining tourism-based economy.	Hualapai Indian Tribe	Hannah Waldrop
2824	6	SOC - Socioeconomics	Prior to the pandemic, Grand Canyon West employed more than 1,500 workers (more than 550 of whom were non-tribal members). At that point, the Hualapai Tribe was the second largest employer in Mohave Country, Arizona, and Grand Canyon West hosted over 1 million visitors a year. Operations at Grand Canyon West are now slowly returning to normal capacity as the pandemic continues to ease. But Grand Canyon West requires a secure source of water in order to operate and the Tribe's current reliance on its declining groundwater resources is not sustainable. The Tribe needs the water from the Colorado River that it was promised in its water rights settlement, as ratified by Congress, in order to support the basic domestic needs of its on-Reservation population and to sustain its on-Reservation economy, particularly at Grand Canyon West.	Hualapai Indian Tribe	Hannah Waldrop

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3067	1	SOC - Socioeconomics	The agriculture sector needs to be held accountable for their abuses. There is no excuse for growing water intensive crops like alfalfa and cotton in the desert. Destructive practices like letting cattle range on federal lands should be stopped.		Robert Brewer
9519	2	SOC - Socioeconomics	Please DO ALL YOU CAN to protect the future of people who rely on the Colorado River!		Bonnie MacRaith
9614	2	SOC - Socioeconomics	This is important not only for the wildlife but also for the communities enriched by visitors who come to watch the wildlife.		Sharon Enzi
9672	2	SOC - Socioeconomics	This request is about birds and people and we can't afford to separate the two. Once the birds are gone, humans will soon follow.		Sherilyn Burns
10101	1	SOC - Socioeconomics	This also affect the rural life of people who live in these wild ecosystems as well destroying their environment.		Margot Ernst
11011	4	SOC - Socioeconomics	The Colorado River is the lifeblood of the American West.		Nancy Jensen
14729	6	SOC - Socioeconomics	I am aware of its importance to communities throughout its basin and as a major driver of the U.S. economy.		Wallace Elton
14953	2	SOC - Socioeconomics	and a major driver of the U.S.		Richard Stafford
15173	2	SOC - Socioeconomics	and a major driver of the U.S.		Deborah Phillips
15614	1	SOC - Socioeconomics	Protecting the Colorado River is essential, not only for the livelihoods and economic forces that depend on it,		Kathy Kelly
15618	2	SOC - Socioeconomics	The Colorado River is a important to our economy,		Shenandoah Marr
16207	2	SOC - Socioeconomics	a major driver of the U.S. economy,		James Heidke
16668	1	SOC - Socioeconomics	also has a tremendous impact on local economies that depend on this recreation for survival.		Tina
16688	3	SOC - Socioeconomics	and also has a tremendous impact on local economies that depend on this recreation for survival.		Edward Timmons
17236	2	SOC - Socioeconomics	It is also a major driver of the U.S. economy.		Erin Peffley
17241	24	SOC - Socioeconomics	Other resource impact analyses should include (but not be limited to): - Socioeconomic and environmental justice considerations including farm labor;	National Audubon Society	Jennifer Pitt
17373	1	SOC - Socioeconomics	Decades ago, I was learning and teaching others about the Colorado River. economy â€" it provides water to millions throughout the West,		Virginia Hanley
17405	3	SOC - Socioeconomics	Recreational activities on the lakes, such as boating, fishing, and water sports, contribute significantly to our economy. They attract tourists from around the globe, bolster local businesses, and provide employment opportunities for thousands. However, as the water levels drop, these activities are increasingly threatened, and so are the livelihoods depending on them.		Joshua Haiges
20355	10	SOC - Socioeconomics	Community and Environmental Protections Communities and ecosystems should not suffer additional harms in the interests of protecting system storage and dam operations. Each action alternative in the Post-2026 EIS must include elements that fully mitigate the environmental and community impacts of water use reductions throughout the Colorado River Basin and the areas served by Colorado River supplies. The curtailment of water deliveries to irrigation districts will undoubtedly impact farm labor and farm worker communities. These impacts need to be assessed, minimized and fully mitigated. This EIS should consider and evaluate potential scenarios for repurposing of lands removed from irrigation, consistent with the views and preferences of impacted communities.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20385	3	SOC - Socioeconomics	As the Post-2026 Operational Strategies are developed, those who are currently putting the water to its highest and best use in the present must be given a meaningful opportunity to participate in the decision-making process. Furthermore, any decisions about the use of the river must acknowledge the unique growing conditions of the Southwestern U.S. for year-round production and the economic significance of agriculture dependent on Colorado River water - it extends even beyond the scope of farms and rural communities to include safeguarding our domestic food security. For this reason, it is imperative that the EIS include a detailed analysis of these impacts on agriculture, and food resiliency in the United States.	Arizona Farm Bureau Federation	Ana Kennedy Otto

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20385	4	SOC - Socioeconomics	We do not believe the evaluation of impacts on agriculture in BOR's draft Supplemental Environmental Impact Statement (SEIS) for near-term Colorado River operations was complete, and the agency should make sure to expand and refine its analysis related to agriculture in the EIS it prepares for the Post-2026 Operational Guidelines. There is a consistent focus on the quantity of water agriculture uses to produce food and fiber. Yet frequently, the analysis of the impacts of water reductions and the domino effect of what that leads to is often minimal. For example, the Yuma, Arizona growing region, which relies on Colorado River water, produces 90 percent of the leafy greens consumed in the U.S. and Canada from November through April.	Arizona Farm Bureau Federation	Ana Kennedy Otto
20469	9	SOC - Socioeconomics	4. How will this EIS ensure the quality of the recreational river running experience, the viability of the thriving recreational river running industry in Grand Canyon, and its significant economic benefits to the state of Arizona?	Grand Canyon River Guides, Inc.	Lynn Hamilton
20490	5	SOC - Socioeconomics	regional economy related to Lake Powell,	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	37	SOC - Socioeconomics	Reservoir-Related Resource and Recreation Concerns Visitation and recreation at Grand Canyon, Glen Canyon, and Lake Mead result in a combined visitor spending of over $1.4 billion per year, and a regional economic output of over $1.8 billion (Table A-1). These numbers will be even larger because of impacts to upper basin park units if the scope of this EIS includes the reoperation of upper basin dams to continue DROA. These economic outputs are important portions of Arizona, Utah and Nevada state revenues and are critical to sustaining each park's gateway communities. The NPS recommends the potential impacts of each alternative operational strategy be evaluated and presented in the EIS because a substantial portion of this economic activity will be impacted negatively if reservoir water levels in either reservoir remain critically low or decline further.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20608	14	SOC - Socioeconomics	4. Construct alternatives which will provide flows to maintain or enhance the important recreation and tourism economy afforded by a healthy CRE	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20621	1	SOC - Socioeconomics	it is important to recognize the economic benefits of recreation use of these waters is comparable to the economic benefits of the other uses and vitally important to the communities that rely on these benefits. The negative impacts of lost recreation access disproportionately impacts Navajo Nation tribal communities on the southern border of the GCNRA, as well as Page, Arizona and should be recognized in the deliberations involving the Drought Response Operations Plan.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20875	1	SOC - Socioeconomics	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.	Southern Arizona Home Builders Association; Home Builders Association of Central Arizona	David Godlewski; Spencer Kamps
20875	2	SOC - Socioeconomics	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.	Southern Arizona Home Builders Association; Home Builders Association of Central Arizona	David Godlewski; Spencer Kamps
20919	6	SOC - Socioeconomics	The CAP supports a vast regional economy in central and southern Arizona. The socioeconomic impacts of deep reductions in water supplies to the CAP would be devastating both from a federal infrastructure standpoint and from a socioeconomic and public health and safety perspective.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman

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20931	1	SOC - Socioeconomics	We are writing on behalf of Central Arizona Irrigation and Drainage District ("CAIDD"), Maricopa-Stanfield Irrigation & Drainage District ("MSIDD"), New Magma Irrigation and Drainage District ("NMIDD"), Queen Creek Irrigation District ("QCID"), and San Carlos Irrigation and Drainage District ("SCIDD") (collectively "Districts")... The Central Arizona Project ("CAP") has long been an essential source of irrigation water for agriculture in the Districts, comprising more than 260,000 acres located principally in Pinal County, Arizona. The Districts are the primary users of the CAP Agricultural Settlement Pool ("Ag Pool") dedicated to agricultural users who relinquished long-term subcontracts and allocations of CAP Non-Indian Agricultural ("NIA") Priority water to help facilitate Indian water rights settlements and resolve CAP repayment issues in connection with the Arizona Water Settlements Act of 2004 and underlying settlement agreements. CAP water delivered to the Districts helps sustain some of the most productive agriculture in the Nation. For example, a December 2018 study conducted by the University of Arizona found that, relative to all U.S. counties, Pinal County ranks in the top 2% for total value of agricultural sales, the top 1% for animal product sales, the top 1% for milk sales, the top 3% for total crop sales, and the top 7% for vegetable, fruit, and nut production.1 Future access to CAP water is crucial for the long-term viability of agriculture in the Districts, which is a cornerstone of the regional economy and a bulwark against food security issues. The Districts are among the water users impacted earliest and most dramatically by operations under the current 2007 Interim Guidelines and Drought Contingency Plan ("DCP").	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan
20962	1	SOC - Socioeconomics	Reduced Hydrology and the Impact to Hydropower Contractors Hydropower customers are the primary funding source for the ongoing operation and maintenance of the dams and related facilities. In addition to supporting hydropower production, hydropower revenues also support other programs and services not directly related to the production of power including downstream water delivery, environmental protection, and tourism. Reclamation and Western Area Power Administration (WAPA) have done their best to control costs for their customers during the drought, but both agencies continue to face upward pressure on costs caused by reduced hydrology, increasing plant and equipment costs and the requirement and need to subsidize non-hydropower programs to the contractors' financial detriment.	State of Nevada Colorado River Commission	Eric Witkoski
20962	3	SOC - Socioeconomics	Impact Analysis and Mitigation Options The post-2026 guidelines and strategies are most likely going to have scenarios that result in hydropower customers receiving less energy at higher prices. An analysis of those impacts is needed. If those impacts are significant, which is highly plausible, such information would be informative to identifying legislative and regulatory strategies that could help mitigate those impacts on hydropower customers. These strategies could, for example, involve enhancing the ability of the federal agencies to raise revenue to support the operation of the dam and visitor centers and/or reducing power customer cost responsibility for expenses not directly related to the production of hydropower.	State of Nevada Colorado River Commission	Eric Witkoski
20970	1	SOC - Socioeconomics	First and foremost, I support any and all efforts taken to conserve water and significantly reduce agricultural water uses in the Basin. Priority should be given to preserving agricultural lands that grow crops that are less water intensive and that provide essential domestic distribution of food for people first, animals second. As agricultural lands are fallowed, owners should be paid market value for their rights and provided opportunities for career transition (there must be models for this out of the Pacific Northwest after massive reductions in timber harvest a couple of decades ago). And finally, it will be critically important to have an implementable plan in place to mitigate the effects of fallowing which could easily create new environmental catastrophes by opening lands to invasive weeds and diminishing air quality with airborne - and in many cases, chemically contaminated - soils.		Jeanne Evenden
20976	1	SOC - Socioeconomics	We [Arizona Municipal Water Users Association (AMWUA)] ask that when reviewing our input, Reclamation keeps in mind the importance of urban water users in the Colorado River Basin, and the serious economic consequences that water uncertainty in the West presents for our nation.	Amwua One for Water	Warren Tenney
21064	2	SOC - Socioeconomics	2. Please emphasize human food agricultural land preservation while fallowing agricultural lands that feed animals, in addition to caring for the livelihoods of farmers and the sustainability of their ecosystems.		Bridget Dorsey
21081	9	SOC - Socioeconomics	Given how agriculture is by far the largest use of water in the Colorado River Basin, it will be important to intervene in agricultural markets and international sales of crops. Much of the crops grown in the basin are sold overseas, functionally transporting water and soil out of the Colorado River Basin. Creating subsidies and incentives to keep food in the United States will be an important component to the sustainability of water use in the Colorado River Basin.	Dolores River Boating Advocates	Rica Fulton
21081	20	SOC - Socioeconomics	BOR should work with USDA and other state and federal agencies to create reports that summarize crop type and use associated with the Colorado River.	Dolores River Boating Advocates	Rica Fulton
21104	3	SOC - Socioeconomics	3. Prioritize the preservation of agricultural lands that feed people, fallow agricultural lands that feed animals first, and with any fallowing include just compensation and/or just career transition opportunities for impacted producers, and a plan to mitigate harmful environmental impacts of fallowing		Lily Bosworth
21302	16	SOC - Socioeconomics	Water Conservation. For activities that have already occurred in the Basin or where existing research is available, the analysis should note the estimated and relative costs and benefits of implementing conservation activities and the estimated volumes of savings that could be achieved by conservation investments.	City of Phoenix	Cynthia Campbell

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21302	21	SOC - Socioeconomics	Socioeconomics. The scope of the EIS should include an adequate assessment of socioeconomic impacts of various alternatives and potential shortages on Colorado River users, including municipal and industrial users. For example, reduced or complete loss of water supply to municipalities can have devastating impacts on employment, the housing market, health care services, education, food packaging and distribution, pharmaceutical production, and defense manufacturing, among other critical sectors that will affect the economy. These impacts should be part of the EIS analysis.	City of Phoenix	Cynthia Campbell
21302	23	SOC - Socioeconomics	Agricultural Resources. The scope of analysis should include an analysis of (1) the agricultural areas and crop types being grown in the Basin that use Colorado River water, including identifying whether the crops are for human or animal consumption, and (2) the economic value of water in agricultural operations separated out by region and crop type. With nearly 80 percent of Colorado River water supporting agricultural uses, it is important for water planning efforts to have a clear understanding of the use of the water and be able to identify areas where investments in infrastructure, the development of new crop markets, water transactions, or other climate adaptive measures may help to address ongoing supply-demand imbalances.	City of Phoenix	Cynthia Campbell
21302	28	SOC - Socioeconomics	Specifically, the SEIS did not provide any clear analysis of how potential water shortages would impact municipal and industrial (M&I) users, leaving stakeholders without a sufficient analysis of direct, indirect, and cumulative impacts. Shortages to M&I users have the potential to negatively affect potable water availability, drinking water treatment plant operations, users' water quality, bond ratings, business investment, employment, the housing market, gross domestic product, packaging and shipping of agricultural products, and semi-conductor and defense output, among a host of other sectors. The possibility of a loss of a Colorado River water supply on municipal and industrial users could have an extreme impact on both the local and national economy that should be analyzed. This is particularly critical in light of the fact that the water supply challenges that will be created by any near-term action taken on the Colorado River must be met with the water supply infrastructure and the alternative supply options that are in place today. Changes to that infrastructure or associated operations necessary to adapt to long-term shortages will take substantial time and financing to plan and build; if those changes will be necessary, that will also require significant federal action and support that needs to at least be anticipated by this NEPA analysis.	City of Phoenix	Cynthia Campbell
Form 2	-	SUSMANAGE - Sustainable, reliable, and adaptive management	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.	National Audubon Society	
Form 5	-	SUSMANAGE - Sustainable, reliable, and adaptive management	2) BuRec must adopt solutions that are long-term, equitable, sustainable, and actually solve the problems on the Colorado River rather than kick the can down the road,	Save the Colorado	
Form 5	-	SUSMANAGE - Sustainable, reliable, and adaptive management	the river needs to be fixed using Nature-Based Solutions that are also climate action to mitigate, and allow adaptation to, climate change that will further decrease flows in the future.	Save the Colorado	
Form 5	-	SUSMANAGE - Sustainable, reliable, and adaptive management	3. Enacting conservation programs to save Mead Reservoir.	Save the Colorado	
12	1	SUSMANAGE - Sustainable, reliable, and adaptive management	So, so my general comment is, is to develop mechanisms through which legislation can be adapted updated a l adapted and updated in an appropriate timeline which the situation requires. Because, as there is less and less water and more and more people using that water, it becomes, more and more of an untenable situation. So, developing the legal frameworks to adapt to those changing hydrologic conditions,		Greg Bolla
138	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please, please, please change the play book so that more common sense is factored in with managing the water and water levels. I think the needs for everyone involved above and below the dam can be met with better management and water conservation in Lake Powell.		Jon Stones
494	6	SUSMANAGE - Sustainable, reliable, and adaptive management	Additionally, maintaining a healthy lake helps retain the stories and memories of generations who have lived near and interacted with the reservoir.		Matthew Riddle

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494	9	SUSMANAGE - Sustainable, reliable, and adaptive management	As climate change and population growth continue to strain water supplies, responsible stewardship of water reservoirs becomes imperative. By managing water levels more effectively, we can ensure a sustainable water supply for both human needs and ecological balance, mitigating the risk of severe water shortages during drought periods.		Matthew Riddle
540	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Make water planning a high priority. We donâ€™t know the future, so please make sure we can pivot.		Lori Rhead
745	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please make a decision that takes the future into account and save the river and everything that depends on it.		Sharon Silverman
747	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is ABSOLUTELY MANDATORY, and we need to FULLY restore and protect it starting NOW and continuing PERMANENTLY!!!		Jeffrey DeCristofaro
782	2	SUSMANAGE - Sustainable, reliable, and adaptive management	We strongly encourage you to consider and adopt solutions that are long-term, equitable, sustainable, and actually solve the problems on the Colorado River rather than kick the can down the road for a few years by simply tweaking the 2007 Interim Guidelines.	Save the Colorado	Gary Wockner
799	4	SUSMANAGE - Sustainable, reliable, and adaptive management	I hope that policy makers will avail themselves of this crisis and opportunity to rectify past errors and take a long term, pro-active approach to realistic water and resource management rather than try to prop up a system that makes no sense in todayâ€™s (or yesterdayâ€™sâ€¦) world.		Janet
808	1	SUSMANAGE - Sustainable, reliable, and adaptive management	A holistic, long range approach incorporating all effected parties and habitats simultaneously, should be prioritized to insure sufficient resources for the future of the aforementioned elemental factors.		William Underwood
832	2	SUSMANAGE - Sustainable, reliable, and adaptive management	BuRec must adopt solutions that are long-term, equitable, sustainable, and actually solve the problems on the Colorado River rather than kick the can down the road,		Gary Wockner
900	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Current growth patterns, seemingly without accounting for water usage are unsustainable.		Ernest Long
988	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Management of the Colorado river is complex and critical to the health of our environment.		Stacy Stephens
1320	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Debra Taylor
1405	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The Colorado River is essential for the health of this country. Protecting it for future generations is essential.â€¯ Without healthy water systems in nature life cannot survive. This is extremely important that we do all that we can for the the Colorado River and the life that depends on it!		Nicole Martel
1523	1	SUSMANAGE - Sustainable, reliable, and adaptive management	We have run out of time and if we donâ€™t protect river like the Colorado we will be killing not just wildlife,but our life as well.		Catherine Blackburn
1731	2	SUSMANAGE - Sustainable, reliable, and adaptive management	I am writing as a New York resident who lives along the banks of the Hudson River in Suffern, New York and strongly supports full protection for all our rivers and the families, wildlife and ecosystems who depend upon the ability to access these rivers for their livelihood, and survival. The Colorado River is the lifeblood of the American West.		JEAN Naples

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2176	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯ Our nation depends on you to do so.		Nicole Wright
2336	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.		Patricia Betzhold
2422	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Herb Huebner
3854	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The more we study ecological systems, the more we find out about how interdependent everything is. Thinking and working in the wider context of preserving species, wetlands, and people gives us a much better chance at avoiding unintended consequences because of ignorance.		Elly Claus-McGahan
7478	1	SUSMANAGE - Sustainable, reliable, and adaptive management	It's a shameful that Saudi Arabian businesses are allowed to lease land to grow alfalfa. Alfalfa is the most water consuming crop that could be grown. It is outlawed in Saudi because of its water consumption. Yet we allow them to grow it and consume massive amounts of water and ship it out of our country.		Hazel E Cross
7682	1	SUSMANAGE - Sustainable, reliable, and adaptive management	One of the most important components to managing the Colorado river, is managing the watershedâ€™s in a healthy and responsible way. For much of the western southwest this includes frequent, low intensity, fires. It is essential that a normal fire regime be restored to the south west, and western portions of our country that historically have had frequent low intensity fires.		Curt Kennedy
8044	2	SUSMANAGE - Sustainable, reliable, and adaptive management	As climate change destabilizes the Colorado River system, please, Reclamation, identify right away how important environmental resources will change, then invest in solutions, including available federal funding, to help ensure that these habitats continue to support the birds and other wildlife that depend on them.â€¯ It is tragic whenever we lose a bird or other wildlife species to extinction, further reducing the diversity and wonder of our natural world. We must protect life!		Sue Stoudemire
8694	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I urge Reclamation to invest in solutions to keeping habits for creatures, birds and humans seeking balance and the inspiration nature provides in abundance -- e.g., federal funding to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Rose Jenkins
9234	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯Clearly, in terms of the Colorado River, human "management" has failed miserably. We need to stop thinking about how to exploit the river economically and instead think about how to preserve and restore it. We cannot afford to continue to allow humans to heedlessly expand settlement in this area.		Jeanine Center
9657	1	SUSMANAGE - Sustainable, reliable, and adaptive management	If the Colorado river is not maintained in a sustainable way for all portions of its flow,		Philip Donnelly
9865	2	SUSMANAGE - Sustainable, reliable, and adaptive management	so I absolutely support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term.		Jane Haspel
10064	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The greatest good is served only by preserving and protecting biodiverse natural systems on which all life depends and wildlife that inhabit them. Protect our natural heritage for wildlife and their future generations.		David and Judy Berg
10493	2	SUSMANAGE - Sustainable, reliable, and adaptive management	WE NEED YOUR HELP TO SECURE THE COLORADO RIVER FOR OUR WILD NATUAL CREATURES AS WELL AS FUTURE GENERATIONS.		SUZANNE Dauber

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10519	1	SUSMANAGE - Sustainable, reliable, and adaptive management	We must protect it for future generations.		Anne Randolph
10671	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Find a way to insure this river remains for all time, for all people.		Chester Kusek
10696	1	SUSMANAGE - Sustainable, reliable, and adaptive management	It's time to start thinking holistically about our future instead of taking a narrow human-centered approach. If we destroy habitat for all animals but ourselves, it means that we will destroy ourselves. The planet will not function if it is filled with people and nothing else. We're already seeing the devastating effects (on people, ironically) of a resource management and development approach geared toward meeting only human needs. That just doesn't work...everything needs to be cared for to achieve a sustainable balance. And technology won't help us in this case.		Diana Colangelo
10791	4	SUSMANAGE - Sustainable, reliable, and adaptive management	invest in solutions, (including available federal funding), to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Joseph Chlup
10791	5	SUSMANAGE - Sustainable, reliable, and adaptive management	The federal government should look more broadly and intelligently at the impacts of proposed management actions.		Joseph Chlup
10882	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Julie pearce
10952	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Jo Ellen Bate
11011	3	SUSMANAGE - Sustainable, reliable, and adaptive management	Decisions made today might impact the riverâ€”and all the birds, wildlife, habitats, and people that rely on itâ€”for generations.		Nancy Jensen
11256	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please, look at the broad picture when planning for the Colorado River. We must protect the habitat for the wildlife as well as providing for people.		Linda Buchser
11266	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I urge you to invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Karen Blackmore
12335	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I am writing in support of environmentally sound management of Colorado River water.		David Harrison
12813	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Federal funding for multi-benefit projects associated with the Colorado River.	Oceanforesters	Mark Capron; Mohammed Hasan
13871	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Give indigenous peoples conservation control over their unceded lands Wilderness reserves.		Betsy Cornwell

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13979	1	SUSMANAGE - Sustainable, reliable, and adaptive management	It is time to protect and preserve the waters, the air and the land that we all rely on to survive and make this planet a healthy and safe place to live. Let's think about the future of this country and the planet and put the future above our selfish and immediate interests. Humans, birds, animals and all the living creatures on this Earth deserve healthy rivers, lakes and oceans, but humans have done a good job of polluting and destroying this environment. It is time we change course and make this planet healthy again. The Colorado River is part of this effort		Nan Corliss
14601	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please take a broad, long term view when developing plans for managing the water in the Colorado Rivet.		Dorothea Theus
14704	1	SUSMANAGE - Sustainable, reliable, and adaptive management	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Susanna L. Wells
14729	4	SUSMANAGE - Sustainable, reliable, and adaptive management	I believe that the federal government has a responsibility to take an encompassing view and careful review of the potential impacts of all proposed management actions and adopt solutions for habitats that do not have secure water sources.		Wallace Elton
14729	5	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting its many values for future generations is essential.â€¯		Wallace Elton
14819	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Kathy Groshong
14953	1	SUSMANAGE - Sustainable, reliable, and adaptive management	the Colorado River is a national treasure		Richard Stafford
15066	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I want future generations of humans and wildlife to have enough water for our lives.		Mary Knight
15173	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I want to remind you that the Colorado River is a national treasure		Deborah Phillips
15264	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is vital for ecological zones and agriculture.		Barbara Toshalis
15618	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is of the utmost importance.		Shenandoah Marr
15966	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The Colorado must be protected. It is a vital resource and habitat and needs to last for a long time under very difficult circumstances.		Cheryl Stevenson
16155	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please use your authority to protect life for future generations. As you all know well, over the decades, we've lost a massive amount of habitat--we can't afford to lose any more.		Sara E Eldridge

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16207	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I live in Tucson, AZ and recognize that the Colorado River is a national treasure,		James Heidke
16208	1	SUSMANAGE - Sustainable, reliable, and adaptive management	It must be protected for future generations.â€¯		Martin Osborne
16248	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations and the ecosystems we and wildlife depend on is essential.â€¯		Margaret Friedenbach
16284	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations -- human and native animals and birds -- is essential.â€¯		Heather Hollowell
16285	2	SUSMANAGE - Sustainable, reliable, and adaptive management	All life depending on the Colorado River, is depending on you to assure the balance and appropriate oversight and support of this endangered river. All life, to include human as well as animal and plant is interdependent.		Cathy Popp
16290	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please understand and then do your duty to protect the Colorado River and the life it sustains for future generations.		Diane Barker
16329	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations and our current, fragile, ecosystem is essential.â€¯		linda robbins
16338	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Future generations and all wildlife in that area are critically dependent on this river system.		Deborah and Robert McCutcheon
16403	1	SUSMANAGE - Sustainable, reliable, and adaptive management	now it is our time to do everything we can to conserve this river and the people and wildlife that depend on it.		Robert Brandt
16438	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Please do something to protect and preserve our most precious natural resources for future generations to enjoy .		Ron Krakowiak
16542	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Martha Coppola
16616	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Lloyd Williams
16640	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting the River as a life-giving force for future generations is essential.â€¯		Linda Averill
16727	2	SUSMANAGE - Sustainable, reliable, and adaptive management	the post-2026 guidelines must be sufficiently expansive in scope and purpose to encompass the many changes required to protect the stability and sustainability of the Colorado River.	Pacific Institute; Natural Resources Defense Council	Michael Cohen; Ed Osann

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16804	3	SUSMANAGE - Sustainable, reliable, and adaptive management	Creating guidelines that proactively plan for many potential hydrologies and responses can also reduce the time and resource burden on policy makers, water managers, and stakeholders who have repeatedly returned to the negotiating table over the past decade to manage increasingly severe drought. More proactive and anticipatory management will free up capacity for these individuals and their organizations to focus on enduring sustainability solutions for the basin, rather than managing emergencies.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16804	5	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post 2026 Guidelines should also develop a greater diversity of response options that can be flexibly and adaptably employed in response to variable conditions4. Managers and stakeholders have worked hard to develop, and in some cases pilot, potential response options. These range from system conservation and demand management programs, which can provide temporary relief, to collaborative partnerships that may lead to new technologies and infrastructure to support longer-term water supply sustainability. In developing the Post 2026 Guidelines, it is critical to consider the different roles these and other diverse response options may play in the basin's future, as well as ways to support the implementation of promising options as needed.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16804	10	SUSMANAGE - Sustainable, reliable, and adaptive management	the Post 2026 Guidelines consider the basin as a holistic and integrated system, rather than a series of storage reservoirs that are managed separately.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16804	13	SUSMANAGE - Sustainable, reliable, and adaptive management	Conceptualizing of the Colorado River as a single basin helps bring into focus the commonalities, rather than differences, that exist among the many users and uses of water. In this vein, the Post 2026 Guidelines should, at their core, reflect the shared goals and shared risks of the Colorado River Basin community that have been illuminated through years of deliberative and collaborative policy making in the Basin. For example, low reservoir levels threaten critical infrastructure, which creates cascading risks for water supply and energy grid stability for various users. Similarly, steep declines in river health will ripple out to harm the community as a whole as ecosystems are stressed. Putting these shared risks - and actions to address them - at the center of the Post 2026 Guidelines can help orient individuals to think more collectively about basin management and potentially be more willing to collaborate with fellow stakeholders.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16821	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I am relying on the BORÂ's decision making to ensure that the members of my generation (and the generations to come after) have a secure water future.		Teal Lehto
16940	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I believe that in this time of rapidly changing climatic conditions the approach to management of the Colorado River should be nimble, far sighted, and adaptive on a scale that matches the time frame changes are occurring on, and that we as a culture should strive not only to maintain the still existing natural and wild components of this river, but also to reverse the process of degradation that has been inherent in our management of it this last century or more.		Jed Koller
17035	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯We, along with many other beings, rely on this river to live. We humans do not live in a vacuum. We need other forms of life in order to survive. This includes plants, animals, birds, reptiles and fish.		Sandra Almand
17102	3	SUSMANAGE - Sustainable, reliable, and adaptive management	We strongly support replacing the current outdated and inefficient guidelines and strategies in order to achieve more sustainable use of the Colorado River in this time of extended droughts and climate change impacts of increased temperatures and reduced river flows.	Lahontan Audubon Society	Rose Strickland
17202	3	SUSMANAGE - Sustainable, reliable, and adaptive management	*Taking a holistic approach to Colorado River water and power management that focuses on sustainability for the Basin's population (over 5 million water and power customers in significantly underserved areas of the United States) and increases system (including grid) resiliency.	CREDA Colorado River Energy Distributers Association	Leslie James
17202	4	SUSMANAGE - Sustainable, reliable, and adaptive management	*Proactive management to improve system stability;	CREDA Colorado River Energy Distributers Association	Leslie James
17202	10	SUSMANAGE - Sustainable, reliable, and adaptive management	*Minimizing system vulnerability;	CREDA Colorado River Energy Distributers Association	Leslie James

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17236	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Our Colorado River is a national treasure.		Erin Peffley
17241	8	SUSMANAGE - Sustainable, reliable, and adaptive management	4. Reclamation's study process should include consideration of actions designed to improve the health and sustainability of Colorado River-dependent habitats.	National Audubon Society	Jennifer Pitt
17241	32	SUSMANAGE - Sustainable, reliable, and adaptive management	Aim for management that avoids crises - Failure in this realm will perpetuate a crisis-based decision environment and continued uncertainty for all water users. In a perpetual crisis environment, water shortages - including in some cases potential loss of all surface water supply - will continue to threaten the economies of Western communities. In times of water supply crisis, water leaders at the local, state, and federal levels will have less latitude and time to consider impacts to vulnerable communities and environmental resources, as their attention will necessarily be directed to the largest water-shortage-related economic impacts. Rather than deferring decisions about shortage-sharing and reservoir management in the driest of future conditions, as was done in the 2007 Interim Guidelines, Reclamation's post-2026 management framework should provide certainty so that local, state, and federal water managers can create plans for those future conditions now, while they have more time to consider a full range of options and impacts.	National Audubon Society	Jennifer Pitt
17241	38	SUSMANAGE - Sustainable, reliable, and adaptive management	Consider increased flexibility in Colorado River management - One often-recognized challenge of Colorado River management is the sheer number of jurisdictions (irrigation districts, municipal water utilities, counties, states, Tribal sovereigns, countries) that share the water resource. Among these jurisdictions are vast differences in water availability, water prices, and economic productivity of water uses. Because of these differences, there are instances where one jurisdiction has invested in water conservation located in another jurisdiction, where such an investment might not otherwise be economically rational. Because water is not perfectly "liquid" in a market sense, Reclamation should consider developing new and expanded tools to promote this kind of flexibility, such as water banks, with appropriate safeguards for third-party environmental and community economic impacts.	National Audubon Society	Jennifer Pitt
17373	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for our own future and that of many generations is essential.â€¯		Virginia Hanley
17405	5	SUSMANAGE - Sustainable, reliable, and adaptive management	The goal is not only to preserve the recreational activities and the industries that depend on these lakes but to ensure the long-term sustainability of these precious natural resources. We believe that with a balanced and forward-thinking approach, we can tackle the current challenges and ensure that Lake Powell and Lake Mead continue to be vibrant and vital parts of our nation's landscape.		Joshua Haiges
17585	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Any proposed management plan that the federal government creates must be holistic and intentional		Jennifer Alsen
17981	1	SUSMANAGE - Sustainable, reliable, and adaptive management	You also need to force Intel to build sustainable systems that greatly reduces the draw on groundwater and from the Colorado River in its operations for chip fab processes in their location in Arizona.		Johnny Cadavid
18823	1	SUSMANAGE - Sustainable, reliable, and adaptive management	It is a shame, a disgrace to a great nation, that Colorado River, the greatest western river, peters out to a garbage-strewn trickle before it ever reaches the Gulf of California - Sea of Cortez. The Colorado River is not a plumbing and sewer system provided by Nature to the people, farms and industries of the southwest. The river is life in the desert, and we have long squandered it. The economic costs of protecting and restoring the river are small compared to the damage we have done and continue to inflict on the region through which the Colorado flows		David Tannenbaum
19044	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ Birds and other pollinators are key to our food supply- don't shortchange them- at our own peril.		Deborah J. Glick
19062	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protect the Colorado for our children & grandchildren, please do not put profit ahead of this wonderful natural resource.		Susan Hawkins

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19084	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯ This is especially true as we look to keeping the Colorado's water available for all users.		John Gibb
19167	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯ Without protection, wildlife is at risk. Health of the Colorado River is at stake! Without protection, this national Gem will be lost! We must protect them!		Claudia Baxley
19167	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯		Claudia Baxley
19167	4	SUSMANAGE - Sustainable, reliable, and adaptive management	Health of the Colorado River is at stake! Without protection, this national Gem will be lost!		Claudia Baxley
19374	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting it for future generations is essential.â€¯ WE have let the water extraction go too far.		John and Nuri Pierce
19471	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Native wildlife should take precedence over water-sucking farming operations, e.g., cotton and alfalfa, that have no business being in a desert/dry country in the first place!		Christina Cowan
19572	1	SUSMANAGE - Sustainable, reliable, and adaptive management	i am calllig for wild animals to be able to get some drinks of water from teh colorado. get the cattle out of all national sites taking up water.they dont belon there		jean publieee
19921	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Reclamation does not effectively manage a distribution of the Colorado River, amicably among the Basin States		Anthony Curtis
20000	1	SUSMANAGE - Sustainable, reliable, and adaptive management	We have to save the Colorado for ourselves and future generations. Please fix the mistakes and eliminate the dams.		David Quinn
20417	20	SUSMANAGE - Sustainable, reliable, and adaptive management	Another example of a flexible and holistic approach achieving multiple benefits is the High Flow Experiment through the Grand Canyon conducted in Spring 2023. Water was transported from Lake Powell to Lake Mead with timing and a flow rate that achieved multiple benefits for sediment transport, beach building, and native fish in the Canyon - all while generating hydropower at Glen Canyon Dam and delivering water to Lake Mead	Western Resource Advocates	Bart Miller
20417	26	SUSMANAGE - Sustainable, reliable, and adaptive management	h. Expanding the scope of the post-2026 guidelines and strategies, and overall system benefits, through a holistic approach One of the key themes Reclamation identified in the Pre-Scoping Process is that "future operational guidelines and strategies should incorporate a more holistic approach to Colorado River water management in a way that focuses on the long-term sustainability of both the Basin's population and natural environment, minimizes system vulnerability, and increases system resiliency." We support this goal for Reclamation and believe the post-2026 guidelines and strategies need to be developed with a geographic scope from the Upper Basin CRSP reservoirs down through the Mexican Delta. If we have learned anything since the 2007 Guidelines were developed, it is that the Basin is connected throughout, and true system resiliency depends on management and policy decisions throughout. DROA operations considering fish needs, and releases into the Grand Canyon considering ecological needs there, are good examples of this.	Western Resource Advocates	Bart Miller
20417	28	SUSMANAGE - Sustainable, reliable, and adaptive management	Overall, Reclamation should be creative in considering how to use and account for storage over the Colorado River system, doing so in a way that holistically achieves multiple benefits while meeting the needs of different water users. Whatever the scope of individual operational rules, the scope of the overall impacts analysis should be broad. Reclamation can further advance a holistic approach protecting important environmental attributes in the Basin through considering mitigation of impacts from operations and strategies to protect and maintain the numerous diverse benefits provided by the Colorado River, its facilities, and its natural resources.	Western Resource Advocates	Bart Miller

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20431	3	SUSMANAGE - Sustainable, reliable, and adaptive management	Finally, SRP believes that the Basin States collectively should account for greater supply variability and take a more proactive approach to water management. SRP has a long history of managing water supplies for the Greater Phoenix area. SRP continually adjusts its water management processes to ensure the availability of water stored in SRP reservoirs, while also protecting groundwater resources for the future. For example, during drought conditions in the early 2000s, SRP incorporated updated "drought of record" data to better manage low-inflow conditions and add earlier triggers to protect carry-over reservoir storage; this allowed SRP to make smaller, but more timely adjustments to its water mix. These proactive water management adjustments have yielded better results than necessity and circumstance forcing larger and more challenging adjustments. Similarly, SRP believes the operational guidelines should embrace a more forward-looking approach that seeks to slow declines before conditions force drastic cuts that adversely impact millions of water users.	Salt River Project	Leslie Meyers
20438	4	SUSMANAGE - Sustainable, reliable, and adaptive management	Integrity: An overarching goal of the Post-2026 Guidelines should be to help ensure the overall integrity of the Colorado River and its tributaries while providing water for Tribal Nations and for other human and environmental uses.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	6	SUSMANAGE - Sustainable, reliable, and adaptive management	Managing Beyond Crisis Mode: The Post-2026 Guidelines must move beyond managing from crisis to crisis. To provide greater water security for the Colorado River community, management operations must consider and be nimble enough to anticipate and buffer the possible extremes in hydrology, reservoir storage, and Basin conditions to implement actions that are both known and expected to provide predictability and stability for all water users, uses, and ecological, spiritual, and cultural resources within the Basin.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	10	SUSMANAGE - Sustainable, reliable, and adaptive management	3. Provide solutions and strategies for preserving long-term stability and sustainability;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	17	SUSMANAGE - Sustainable, reliable, and adaptive management	4. Provide for flexible water management strategies that contribute to and reflect unique legal, geographical, practical, and political characteristics of both Lower and Upper Basin water security and that accommodate human use of and reliance on the natural systems and the Basin environment;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20438	22	SUSMANAGE - Sustainable, reliable, and adaptive management	5. Allow for adaptation to changing conditions by advancing mechanisms that will help accommodate future arrangements/agreements in furtherance of Basin stability and resilience.	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser

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20438	23	SUSMANAGE - Sustainable, reliable, and adaptive management	1. Advance proactive, comprehensive, and holistic practices that withstand a broad range of future conditions to provide: a. Operational and planning stability for all water users; and b. Support Colorado River ecological, spiritual, and cultural values that are foundational to the integrity of the Basin. 2. Incorporate flexible tools that help reliably manage the Colorado River reservoir system and sustain the integrity of the Basin's resources;	National Audubon Society; Sonoran Institute; Western Resource Advocates; Living Rivers; Colorado River Sustainability Campaign; Southern Ute Indian Tribe; Ute Mountain Ute Tribe; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; Paiute Indian Tribe of Utah; Jicarilla Apache Nation; American Rivers; National Wildlife Federation	Jennifer Pitt; John Shepard; Bart Miller; John Weisheit; Karen Kwon; Melvin Baker; Manuel Heart; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Corina Bow; Edward Verlarde; Matt Rice; Garrit Voggesser
20469	3	SUSMANAGE - Sustainable, reliable, and adaptive management	* a healthy ecosystem based on the preservation of critical habitats and natural patterns and processes, to the extent possible,	Grand Canyon River Guides, Inc.	Lynn Hamilton
20480	9	SUSMANAGE - Sustainable, reliable, and adaptive management	We also ask that the Department identify a durable source of funding to assist in paying for conservation. Given the reduced inflow into the reservoirs and ongoing drought conditions exacerbated by climate change, the need for conservation will be higher than ever. Current sources of federal funding like the Inflation Reduction Act of 2022 will not be available for new programs started after 2026. As such, identifying a long-term source of funding to support the conservation needed to respond to climate change will be an important part of success.	Southern Nevada Water Authority; Metropolitan Water District of Southern California; Central Arizona Water Conservation District	John Entsminger; Adel Hagekhalil; Brenda Burman
20481	11	SUSMANAGE - Sustainable, reliable, and adaptive management	The alternatives considered must incorporate the flexibility and adaptive management necessary to respond to changing conditions while ensuring sufficient certainty for the Basin States and Colorado River water users to manage water supplies.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20486	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Although they were inadequate, the experience learned under the 2007 Guidelines and DCPs should to inform the Post-2026 Operations. That experience teaches us that we must prepare for and create rules which are responsive to a wide range of variable hydrology--from wet to very dry. The variable and dry hydrology of the recent past teaches us that we must balance consumptive uses and depletions with available supply. That balancing will be the foundation for sustainable management under Post-2026 Operations.	State of Wyoming	Brandon Gebhart
20486	5	SUSMANAGE - Sustainable, reliable, and adaptive management	The 2007 Guidelines also taught us positive and negative lessons about flexibility. The flexibility imbedded in the 2007 Guidelines, as well as the DCPs, centered on helping the Lower Basin plan and operate with more certainty and predictability based on annual, and forecasted, system conditions. However, the flexibilities implemented to mitigate impacts of actual conditions did not extend to the Upper Basin to an equitable degree. On the contrary, flexibility at Lake Powell exacerbated dry conditions by only allowing increased, not decreased, releases. Further, flexibility contained in the 2007 Guidelines intended to incentivize Lower Basin conservation, while undeniably important and necessary to minimize the extent and duration of shortages in the Lower Basin, worked to increase the risk of Upper Basin curtailment. Flexibility in Post-2026 Operations must attempt to achieve certainty and predictability for the entire Basin, not just the Lower Basin. The flexibility must allow for adaptation to changing conditions while ensuring sufficient operational certainty for the Basin States and Colorado River water users to sustainably manage water supplies into the future.	State of Wyoming	Brandon Gebhart

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20489	1	SUSMANAGE - Sustainable, reliable, and adaptive management	1. The post-2026 Guidelines must prepare for the River we have, not the River we want. Downward trending hydrology influenced by climate change will continue to erode the stability of the Colorado River water supply. Successful operational and management strategies must plan for the full range of plausible hydrologic extremes brought on by climate change and accommodate flexible mechanisms that will help advance greater water security and ecological goals in the Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	2	SUSMANAGE - Sustainable, reliable, and adaptive management	2. The post-2026 Guidelines must move beyond managing from crisis to crisis. The stability of the Colorado River water supply is of paramount importance, both to water users who value certainty and to the environment, which depends on the political will of decision-makers who will be challenged to integrate environmental resource considerations in times of water supply crises. The Bureau's metrics for the Colorado River water supply should prioritize system stability over maximizing deliveries to water users.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	10	SUSMANAGE - Sustainable, reliable, and adaptive management	The future of the Colorado River and its tributaries hinges on whether the Colorado River community can adapt and adjust to hydrologic extremes and hotter, drier conditions. To be successful, the post-2026 Guidelines will have to acknowledge and consider the full range of future conditions throughout the Basin and execute strategies and operations that are geared toward a sustainable use of the Colorado River for people and the natural environment for years to come.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	24	SUSMANAGE - Sustainable, reliable, and adaptive management	Going forward, actions must move away from reactively responding to immediate circumstances based on limited forecasts and modeling. They must rely on the best available science, trending hydrology and demands, and actual resource conditions to identify operations and strategies with adequate lead time that work to overcome vulnerabilities and allow people and ecosystems to (i) recover from current conditions and (ii) adapt to possible extremes in the water demand and supply imbalance in the future. This requires more than simple tweaks to the current guidelines. It calls for a comprehensive look at system operations to develop robust approaches to variable circumstances in both the Upper and Lower Basins for the years to come. We are particularly encouraged by the Bureau's proposed use of robust decision-making approaches in the NEPA process, including its emphasis on identification of vulnerabilities and strategies to address them in lieu of more traditional, scenario-driven approaches to planning.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	27	SUSMANAGE - Sustainable, reliable, and adaptive management	v. Incentivizing adaptive and flexible strategies: Thoughtful and measured strategies and operations for all parts of the system to adapt instead of break. The new strategies and operations must build on the flexibility we have exercised over the past decades (e.g., Intentionally Created Surplus, Intentionally Created Mexican Allotment, Binational Intentionally Created Surplus, Drought Response Operations, System Conservation, etc.) or enable new opportunities (e.g., Demand Management Storage Program) to pursue innovative policies that will recognize and responsibly address the various interests and needs on the river going forward, including the environment.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	30	SUSMANAGE - Sustainable, reliable, and adaptive management	i. Being proactive not reactive: Measures that work to proactively avoid and recover from the risk of the worst-case scenarios and provide a cushion against vulnerabilities and extremes going forward.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	36	SUSMANAGE - Sustainable, reliable, and adaptive management	d. Resilience building activities - The scale and pace of climate-related changes in the Colorado River Basin are affecting availability and reliability of water supplies for agricultural operations, rural and urban water demands, energy use, wildlife, and watershed health. Post-2026 operational strategies for the Colorado River must work in tandem with, and not impede, ongoing efforts to build resilience and adapt to hotter, drier conditions in the West.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20496	11	SUSMANAGE - Sustainable, reliable, and adaptive management	Protecting the Colorado River also protects the lives of 40 million people, Indigenous homelands, flora, and fauna. The living Colorado River shaped the Western landscape as we know it over the course of millions of years. It is our responsibility to ensure it continues to flow.		Morgan Sjogren
20521	1	SUSMANAGE - Sustainable, reliable, and adaptive management	In the past, projects proceeded in ignorance without a clear understanding of the literal and figurative downstream effects. Now we can no longer claim ignorance as we can clearly see how our decisions of the past, have affected the environment around us. We need to make any future decisions to consider all the ramifications. Our decisions can not simply and solely be based upon financial considerations for the growing of crops or the watering of lawns. We need to take into account the ecosystems that rely on the water from the Colorado.		Gary Gordon
20537	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The decisions made now will have an impact on generations to come.		Rozlyn Rogers
20608	1	SUSMANAGE - Sustainable, reliable, and adaptive management	GCWC staff serve on the Adaptive Management Work Group (AMWG) FACA committee representing conservation interests, and we have strongly emphasized the need to base dam operations and Colorado River stewardship on clearly defined desired future conditions, high quality scientific understanding, well-reasoned planning, and conscientiously conducted adaptive management.	Grand Canyon Wildlands Council; Grand Canyon Wildlands Council	Kelly Burke; Larry Stevens
20619	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Conservation measures must be imposed (higher fees will help.)		Paula Dean
20619	3	SUSMANAGE - Sustainable, reliable, and adaptive management	he first consideration should be the health of the river itself,		Paula Dean

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20621	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Because experimental releases are implemented to simulate flooding, it would be scientifically beneficial to also simulate droughts. Flooding and droughts occur naturally, BOR should be simulating both of these natural phases within the Grand Canyon to thoroughly study the effects. These experimental droughts could be done in periods of low water years to more accurately reflect what the natural occurrences of water availability are in those years. BRC supports adaptive management that benefits all users. BOR needs to develop alternatives that more accurately reflect the needs of recreation users on Lake Powell and recognize this massive user group. BOR should develop recreation adaptive management strategies that allow flexibility to outflows throughout the year depending on the estimates of water levels. These adaptive management strategies would still honor BOR desired outflow commitments of Lake Powell. However, they would allow for consideration of recreation interests when determining the timing of these releases. Adaptive management would let BOR schedule the timing of the outflows for the various recreation needs based on the conditions on the ground. For example, during 2023 the Castle Rock Cut was open for a short amount of time. The Castle Rock Cut when open bring various benefits to the recreation users of the lake. It allows from broader dispersal of recreation users and impacts. It lessens fuel costs. It also increases safety by alleviating congestion in the main channel. If BOR was able to utilize adaptive recreation management strategies, the timing of releases in 2023 could have been adjusted to allow the cut to have remained open for longer period of time. We believe this could have been done without jeopardizing energy production. BOR could have reduced outflows for a period of time to prolong the period of time the Cut would remain open, then it could have made up the difference with an experimental release once the water levels dropped below a usable level. Even an extra week or two of access to the Cut would have brought significant benefit to the recreation users of the lake. This would increase good will among the recreation community and bolster public opinion of BOR. As long as the releases don't affect power generation and still maintain the allocated water commitments, BOR should make adjustments to consider recreation users. Currently, BOR considers white water rafters with release and timing decisions and should also consider recreation users on the lake as it develops the new Operating Guidelines. If water levels are predicted to be within the range of 3565 and 3590 feet, it should trigger these adaptive recreation management strategies that would allow BOR to make adjustments in order to sustain access areas such as the cut and Antelope Point public launch ramp. We would always be willing to be partners with BOR in developing and implementing these adaptive recreation management strategies.	BlueRibbon Coalition; BlueRibbon Coalition	Simone Griffin; Ben Burr
20700	4	SUSMANAGE - Sustainable, reliable, and adaptive management	I. ENSURE THE SUSTAINABILITY OF THE COLORADO RIVER AND ITS TRIBUTARIES. The post-2026 guidelines must go beyond the operation of Lakes Powell and Mead and include provisions that acknowledge and ensure the sustainability of the Colorado River and its tributaries.	Grand Canyon Trust	Jen Pelz
20700	5	SUSMANAGE - Sustainable, reliable, and adaptive management	A. SUSTAIN THE COLORADO RIVER. Integrate protections for the health of the Colorado River and its tributaries into the new guidelines.	Grand Canyon Trust	Jen Pelz
20700	50	SUSMANAGE - Sustainable, reliable, and adaptive management	B. WORST-CASE SCENARIO PLANNING. Reclamation needs to conduct worst-case scenario planning to address low runoff conditions and avoid or mitigate critical reservoir elevations. 1. Reclamation should reassess dam infrastructure and develop alternatives for passing water through the dam at low reservoir elevations. Reclamation has identified, as have other stakeholders in the basin,33 their concerns regarding the infrastructure challenge of passing water through Glen Canyon and Hoover Dams at low reservoir elevations. In the Draft Supplemental EIS for Near-term Colorado River Operations, Reclamation provides In recent months, a primary concern for the Department has been to identify and implement actions to ensure that Glen Canyon Dam continues to provide downstream water deliveries as designed and intended (i.e., remains above elevations at/about 3,490 feet above mean sea level). While additional analysis may find that water can be released through the hydropower units when Lake Powell is at slightly lower levels, at this time, 3,490 feet is the cutoff for routine operations. Below this elevation, all water could only be released through Glen Canyon Dam's four river outlet works (reducing operational redundancy and, thus, increasing operational risk for downstream releases). This would create a risk of water supply interruptions to water users that rely on Lake Powell for drinking water supplies; hydropower interruptions to users that rely on Glen Canyon Dam for power supplies; and increased uncertainty regarding downstream releases should Lake Powell continue to decline. As discussed herein, if strategies are adopted to reduce Glen Canyon Dam releases to protect the reliability of routine operations, Lake Mead's water levels will decline at an accelerated rate, increasing risk of Lake Mead declining to critically low levels and threatening water deliveries to those that rely on Lake Mead for water supplies.	Grand Canyon Trust	Jen Pelz

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20700	51	SUSMANAGE - Sustainable, reliable, and adaptive management	We believe that this type of climate resilience planning at Glen Canyon and Hoover Dams is critical and should occur alongside the development of the post-2026 guidelines. This planning should be public and inclusive and should look not only at the immediate problem, but incorporate other related concerns such as passing of non-native fish through the dam, operations to prevent the establishment of non-natives in the canyon, lack of sediment passage through the dam, water temperature, inability to conduct high flow experiments at low reservoir levels at sufficient magnitude, inability to generate hydropower, vegetation encroachment, etc. Schmidt and Kuhn (2023) at 6. This is the type of integrated planning that is likely required in a drier and more uncertain future. We understand that Reclamation has presented some initial summary of its investigations in a presentation titled Glen Canyon Dam Low-Head Hydropower Modifications. It is unclear, however, the status of these investigations and if and when this process becomes more public. This process could benefit from public scooping or informal pre-scoping to identify the issues and investigations that are most important and relevant to stakeholders and the public.	Grand Canyon Trust	Jen Pelz
20738	4	SUSMANAGE - Sustainable, reliable, and adaptive management	This sort of genuinely inclusive consultation is particularly important because it is almost inevitable that adaptation will be necessary. As a society and a species, humans have created climatic conditions that constrain our ability to predict future hydrology with reasonable certainty. Thus, while the next management framework needs to be robust enough to address a range of potential future (and poorer) water supply conditions, it must also build in process steps to allow ample room for adaptative management if and when hydrologic conditions or other circumstances arise that were not fully contemplated in the post-2026 EIS and ROD. Meaningful consultation with Basin tribes - along with Basin states and other stakeholders - must be a component of that effort.	Quechan Indian Tribe	Jordan Joaquin
20738	6	SUSMANAGE - Sustainable, reliable, and adaptive management	The hydrology confronting the Basin has become less predictable and less stable than previously considered, and a management framework that focuses primarily on the coordinated allocation of water between Lake Mead and Lake Powell has already proven insufficient to avoid seemingly constant crisis management. Going forward, the Basin must do a better job by building a management framework that can provide predictability in shortage allocations as well as adaptive pathways that allow for better planning by entitlement holders and contractors. This requires making management decisions by looking at whole system conditions rather than only at the elevations of Lake Mead and Lake Powell at specific moments in time. It also puts a premium on modeling any proposed alternative to assess its performance under a wide range of conditions, including hydrologies that are materially poorer and more dynamic than those seen in prior periods of record.	Quechan Indian Tribe	Jordan Joaquin
20817	9	SUSMANAGE - Sustainable, reliable, and adaptive management	In order to assure stability into the future, the Post-2026 Operations must address the imbalance between available supply and demand, considering increased hydrologic variability exacerbated by climate change. The Colorado River supports multiple uses of water. To protect these varied water uses, Reclamation must develop Post-2026 Operations for Lake Powell and Lake Mead that provide the greatest possible degree of operational certainty for water users and managers while providing sufficient flexibility to respond to changing conditions.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	22	SUSMANAGE - Sustainable, reliable, and adaptive management	3. Assess and disclose the costs for full implementation of mitigation and adaptive management programs along with operations. Reclamation will need to ask Congress for consistent funding to implement post-2026 programs necessary to fulfill management responsibilities outlined in the Record of Decision.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	2	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post-2026 NOI states that the new guidelines, "must be capable of both withstanding a broad range of future hydrologic and operating conditions and minimizing system vulnerability." This requires all parties to look at both hydrologic and operational risk and to develop operational guidelines that provide both flexibility and a balancing of all demands on the system. No one-size-fits-all approach will work. What is needed is leadership in structuring an array of options that reflect the variability of hydrology and the abilities of the states and federal government to step forward with realistic approaches. The range of future hydrologic conditions should anticipate and plan for the worst-case scenario, i.e. the 40-50% reduction alluded to by Dr. Overpeck. But without structural modifications to river infrastructure, namely Glen Canyon Dam, the system will not be equipped to handle these scenarios.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	25	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post-2026 Operations should identify a durable source of funding to assist in paying for conservation. Given the reduced inflow into the reservoirs and ongoing drought conditions exacerbated by climate change, the need for conservation will be higher than ever. Current sources of federal funding like the Inflation Reduction Act of 2022 will not be available for new programs started after 2026. As such, identifying a long-term source of funding to support the conservation needed to respond to climate change will be an important part of success.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman

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20923	8	SUSMANAGE - Sustainable, reliable, and adaptive management	By way of background, the Colorado River District is a political subdivision of the State of Colorado formed by the Colorado Legislature (see, C.R.S. SS 37-46-101, et seq.) in 1937 for the purpose of safeguarding that portion of the waters of the Colorado River apportioned to the state by interstate compact and for promoting the welfare of the inhabitants of the River District. Geographically, the Colorado River District encompasses an area of approximately 29,000 square miles, including all of twelve and parts of three western Colorado counties (approximately 28% of the State of Colorado). Included in that area are the headwaters and tributaries of the Colorado River mainstem and its principal tributaries, the Gunnison, the White, and the Yampa Rivers. The Colorado River District includes municipal, industrial, agricultural, commercial, and recreational water users. Our water users depend upon the wise and proper development and implementation of policies to assure the continued availability of reliable water resources in the Colorado River Basin. We offer the comments and input in this letter for Reclamation's consideration in its analysis and development of post-2026 operational guidelines. The 2007 Interim Operating Guidelines (the 2007 IGs) and the adaptive and emergency management actions implemented following adoption of the 2007 IGs have failed to provide the operational certainty and system stability that the 2007 IGs intended to achieve. The impacts of climate change, drought, and the institutional system imbalance in river operations have made clear that substantial changes must be adopted for the post-2026 guidelines.	Colorado River District	Peter Fleming
20925	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The San Diego County Water Authority (Water Authority) appreciates the opportunity to respond to the Bureau of Reclamation's (Reclamation) published June 16, 2023, Federal Register Notice (notice) announcing the intent to prepare an environmental impact statement (EIS) for the post-2026 Colorado River Reservoir Operational Strategies for Lake Powell and Lake Mead. Specifically, the notice seeks input "on how the purpose and elements of the 2007 Interim Guidelines (Interim Guidelines) should be retained, modified, or eliminated to provide greater stability to water users and the public through more robust and adaptive operational guidelines." The Water Authority is pleased to participate in this process of developing strategies that can promote meaningful dialogue and incorporate substantive input on elements that should be included in the EIS process. As the notice highlights, conditions on the river have changed since the development of the Interim Guidelines. Reduced flows on the river and historically low levels in its two critical reservoirs, Lake Mead and Lake Powell, have led to shortage reductions in the Lower Basin under the Interim Guidelines and the 2019 Drought Contingency Plan. In recent years, reduced flows also necessitated the implementation of emergency Drought Response Operations Agreement releases in the Upper Basin. In addition, Reclamation expects to publish an updated supplemental EIS to the Interim Guidelines that considers alternative near-term actions to bolster the river in consideration of the ongoing effects of drought brought about by climate change. While near-record snow levels this year have brought about a temporary reprieve to the declining conditions in Lakes Mead and Powell and provided more time to develop collaborative approaches to the river's management, it is clear that actions are needed to ensure the sustainability of the river for all users. We support Reclamation's desire for a transparent and inclusive process focused on collaboration and cooperation as we work to develop the post-2026 guidelines. The Water Authority was an engaged partner in developing the Interim Guidelines and supports the actions that have been taken to date. We continue to work collaboratively with our diverse Basin partners to develop near-term and long-term solutions on the river.	San Diego County Water Authority	Dan Denham
20925	5	SUSMANAGE - Sustainable, reliable, and adaptive management	Any additional conservation prescribed through the new set of guidelines must include adequate federal funding to ensure long-term supply reliability and that communities and economies are sustained. * There need to be opportunities for inter-Basin transfers, exchanges, and marketing of supplies as flexible tools for the sustainability on the river.	San Diego County Water Authority	Dan Denham
20927	3	SUSMANAGE - Sustainable, reliable, and adaptive management	Future Lake Powell releases must be consistent with Section 602(a) of the 1968 Colorado River Basin Project Act. Operations should proactively improve system stability and resiliency and seek to avoid allowing federal-managed facilities to fall to crisis levels. To achieve this, operational guidelines and strategies should consider and be adaptable to a broad range of future hydrologic and operating conditions that factor in climate change to minimize system vulnerability with rapidly warming climate conditions. The alternatives should consider a permanent reduction in use in the Lower Basin that corresponds to evaporation and system losses in the Lower Basin and greater flexibility to impose shortages in the Lower Basin in response to changing hydrology. The alternatives should also include the recovery of storage in Lake Powell and Lake Mead so as to allow the reservoirs to function as intended and in response to greater fluctuations in hydrology.	Front Range Water Council	Alan Salazar
20936	4	SUSMANAGE - Sustainable, reliable, and adaptive management	To begin, Lake Powell and Lake Mead operations should be managed in a manner that will minimize the risk of reaching critical elevations in either reservoir. The EIS must incorporate predictable and comprehensible criteria for releases from Lake Powell to Lake Mead. The criteria should further include provisions that will allow for adapting to unexpected changes in hydrology, as well as updated science and accurate modeling. Achieving this balance will reduce the risk of reaching critical elevations in Lake Powell and Lake Mead, while simultaneously providing Colorado River water users with the certainty required to manage water supplies in the long term.	Gila River Indian Community	Stephen Lewis

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20938	10	SUSMANAGE - Sustainable, reliable, and adaptive management	Post-2026 Operations Policy The 2007 Interim Guidelines, the 2019 DCPs and subsequent emergent operations including the 2022 Coordinated Operation, have failed to adequately protect the Colorado River system. Utah will not support the continuation of the current operational framework beyond the Interim Period (2026). Rather, Utah will insist on Post-2026 operations that are resilient, will adapt to changing conditions, can be implemented in a fair and transparent manner and will be sustainable over time. Specifically, Post- 2026 operations must: a. Respond early and appropriately to changing system conditions and recover the system to a desirable state; b. Are effective across a full range of possible future conditions (e.g. both wet and dry hydrology); c. Are clearly defined; d. Are transparent and easy to implement; e. Provide operational longevity under any hydrologic or system condition and do not require reactive intervention; f. Bring certainty and predictability to the operations of the river; and g. Do not favor one basin over another.	Colorado River Authority of Utah	Betsy Coleman
20948	1	SUSMANAGE - Sustainable, reliable, and adaptive management	I would urge you to reflect and focus on the words of the Grand Canyon Protection Act of 1992 and use this as your guiding point in all decisions regarding the future use of this land: 'The Secretary shall operate Glen Canyon DamÂ… in such a manner as to protect, mitigate adverse impacts to, and improve the values for which Grand Canyon National Park and Glen Canyon National Recreation Area were established, including, but not limited to natural and cultural resources and visitor use.Â" (Section 1802, GCPA). The low water levels are more than enough evidence that we are experiencing human caused global warming at a rapid rate, along with severe drought conditions. We must act responsibly for future generations NOW. We must protect this environment, to manage it responsibly, to make sure that all future uses of this land are focused on sustainability while protecting the lands for wildlife habitats, recreational use, and indigenous people's rights, to name a few. It's a big responsibility and your decisions will affect future generations for years to come.		AMY ARNTZEN
20950	1	SUSMANAGE - Sustainable, reliable, and adaptive management	1. The Post-2026 Guidelines should plan for the River we have and not expect the River we want: Successful operational and management strategies must plan for full range of plausible hydrologic extremes brought on by climate change. Plans must provide for and accommodate the flexibility required to deliver predictable and reliable water supplies under diverse circumstances and scenarios. 2. The Post-2026 Guidelines must move beyond managing from year to year--or crisis by crisis: The long-term stability and predictability of Colorado River water supply is the goal, and the Bureau's metrics for the Colorado River water supply should prioritize managing the system to achieve reliability, predictability, and stability over the long-term.	Gadsden Company, Sonoran Wines, Cruz Farm, Greater Area Kingman Chamber of Commerce, Bullhead City Chamber of Commerce; Greater Flagstaff Area Chamber of Commerce	Harold Thomas
20953	1	SUSMANAGE - Sustainable, reliable, and adaptive management	As we look forward into the future and consider what options are available for Glen Canyon Dam, it is imperative that we look at what is best for future generations, for the earth that sustains us, and not the wallets of capitalist greed. The pressures of drought and population are straining the Colorado River, which is a lifeline to the human communities and natural ecosystems of the southwest United States. As stewards of nature, we should take our duty of preserving healthy ecosystems for future generations to be of the utmost importance.		Jessica Shoeneman
20953	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Without these "miracle snowfall" years we've had here and there, it is likely that the Colorado River system of dams and reservoirs would already be defunct. Action must be taken to integrate a plan that will provide the most flexibility over time.		Jessica Shoeneman
20955	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Post-2026 Operations Should Increase Reliability for Water Users- Municipal water providers need increased clarity from Post-2026 Operations on water supply availability. The system should be managed for increased reliability (instead of maximizing diversions and releases), to provide more stability for water users reliant on Colorado River supplies.	Gilbert Arizona Public Works	Lauren Hixson
20963	1	SUSMANAGE - Sustainable, reliable, and adaptive management	Additionally, Sonoran Institute recognizes that, given the enormity and complexity of the challenges facing the Colorado River and implementation of a new management framework, there is a potential for Congressional action to provide the necessary authority and resources toward implementation. The implication here is that the NEPA Process should not be constrained to simply looking at management of Lake Mead and Powell and should encourage dialogue and innovative ideas that ensure the river's resilience and sustainability of the Basin's population and natural environment in the face of unprecedented drought.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	12	SUSMANAGE - Sustainable, reliable, and adaptive management	Develop, implement, and support an adaptive management framework that includes: 1. Short-term adaptive actions in response to more immediate changing hydrologic conditions and longer-term mitigative measures that could be implemented to reduce the overall risk exposure and impacts to the public and the environment.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20963	13	SUSMANAGE - Sustainable, reliable, and adaptive management	Develop, implement, and support an adaptive management framework that includes: Ecological and ecosystem critical aspects, specifically ESA driven issues, and ecosystem integrity thresholds that can be brought into the assessment and decision process, including all the major ESA focused adaptive management, mitigation and recovery programs that today are spread throughout the Basin.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner

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20972	11	SUSMANAGE - Sustainable, reliable, and adaptive management	Overall, one of the most important considerations in the post-2026 process should be how we create certainty, clarity and predictability to the greatest extent possible for all users within the Basin.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	12	SUSMANAGE - Sustainable, reliable, and adaptive management	In setting annual policy, the Bureau must balance its response to the fluctuation of natural systems with the users' need for predictability. Currently, the Bureau's process for establishing its Annual Operating Plans and approving water orders, though not perfect, works to provide stability to water users, particularly in the Lower Basin. Users have adequate time to respond and adjust water use in the following year based on the timing of those operational decisions.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20972	13	SUSMANAGE - Sustainable, reliable, and adaptive management	The Bureau should also implement ways to flexibly account for current hydrology and the actual flow of the River in any given year rather than on a set, perceived annual volume of water. Should these processes and/or methods need to change post-2026 as a result, the District urges the Bureau to insure any new processes provide the same level of stability and certainty and allow sufficient time for water users to react and adjust. Mid year changes in operating plans or approved water orders would be particularly devastating to agricultural water users and their communities given their growing seasons and corresponding contracts.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20976	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Post-2026 Operational Guidelines Should Provide for Increased Flexibility The 2007 Interim Guidelines, DCP, and more have demonstrated that significant operational flexibility is necessary to curb reservoir declines. As climate change continues to impact the availability of Colorado River supplies, water users will need increased flexibility to mitigate shortages and adapt. The Post-2026 operations should continue to evaluate adaptive management strategies that provide flexibility to water users. This flexibility is necessary to enable sustainable management of the river for decades to come by ensuring the new guidelines have all the necessary tools rather than defaulting to the haphazard struggle to mitigate a shortage crisis every year or two.	Amwua One for Water	Warren Tenney
20986	4	SUSMANAGE - Sustainable, reliable, and adaptive management	2. New Mexico believes that Reclamation must continue its efforts to shift management to a sustainable balance. For instance, it is imperative that Reclamation find a way to account for evaporation and system losses in the Lower Basin. Those are estimated to deplete more than a million acre-feet of water each year and are currently unaccounted for. Achieving a sustainable balance is a matter of reconciling demand with available supply. With respect to supply, the EIS must consider drought sequences that are longer and more severe than those observed in the historical record. Conversely, the EIS must also consider the possibility of large quantities of rain and snow coming into the system all at once, in a single year, as occurred in the spring of 2023, or in a series of wet years. With respect to demand, the EIS must consider climate change and its hydrologic consequences, as well as continuing changes in population distribution in the Colorado River Basin.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20986	6	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post-2026 Operations will require flexibility and the ability to rapidly shift between different management options. Therefore, in this EIS, within its narrow consideration of coordinated operations of Lake Powell and Lake Mead, it is important that Reclamation study a large array of hydrologies and tools, in order to have maximum flexibility for rapidly adapting to changing circumstances as necessary after 2026.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20986	10	SUSMANAGE - Sustainable, reliable, and adaptive management	New Mexico also supports projects that increase water efficiency to make better use of the available supply. In addition, New Mexico is supportive of projects that increase the available water supply.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20986	12	SUSMANAGE - Sustainable, reliable, and adaptive management	The Secretary has directed Reclamation to develop post-2026 Colorado River reservoir operational guidelines and strategies for Lake Powell and Lake Mead because the 2007 Guidelines expire at the end of 2025. Post-2026 Operations need to improve the stability of the Colorado River system and ensure that stability into the future. This has to include consideration of the potential for increased hydrologic variability exacerbated by climate change in the Basin. In this context, stability means that some amount of water continues to be available to water users in the Basin in accordance with the spirit of the 1922 Compact. Taking into account current and anticipated natural supply conditions, consumptive uses and losses cannot exceed the natural water supply provided by the watershed. Reclamation data shows that Lower Basin and Mexico depletions are currently double the total depletions in the Upper Basin. Post-2026 Operations must reduce that imbalance. This requires, among other things, effective and flexible mechanisms to protect storage. Increasingly unpredictable hydrology requires protecting higher elevations at Lake Powell and Lake Mead in order to create a buffer to sustain supplies, so that we can withstand consecutive dry years as well as intermittent wet years. Through this EIS, Reclamation needs to develop procedures for Post-2026 Operations that better adapt and respond to actual hydrology and available water supplies in the Colorado River Basin. These supplies support multiple uses of water, including, among others, municipal, tribal, industrial, and agricultural uses, as well as power production. In the Post-2026 Operations, Reclamation will need to place more emphasis on the effects of actual hydrology on Lake Powell and Lake Mead, while using forecast modeling on a more limited basis.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez

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20993	8	SUSMANAGE - Sustainable, reliable, and adaptive management	And beyond 2026, operating principles implemented for the Colorado River System must be sustainable, fair, and equitable.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21001	1	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post-2026 Guidelines should plan for the River we have and not expect the River we want: Successful operational and management strategies must plan for full range of plausible hydrologic extremes brought on by climate change. Plans must provide for and accommodate the flexibility required to deliver predictable and reliable water supplies under very diverse circumstances and scenarios.	Bonneville Environmental Foundation	Todd Reeve
21001	2	SUSMANAGE - Sustainable, reliable, and adaptive management	The long-term stability and predictability of Colorado River water supply is the goal, and the Bureau's metrics for Colorado River water supply should prioritize managing the system to achieve reliability, predictability, and stability over the long-term.	Bonneville Environmental Foundation	Todd Reeve
21001	6	SUSMANAGE - Sustainable, reliable, and adaptive management	The term of the Guidelines must be adequate and flexible enough to incentivize investment and practices that will build real resilience with lasting benefits for the Basin. Durable change in systems and practices across the basin cannot happen quickly. Timelines and signals to water users and basin partners must incentivize long-term and durable action in order to deliver the required system-level change.	Bonneville Environmental Foundation	Todd Reeve
21038	11	SUSMANAGE - Sustainable, reliable, and adaptive management	We hope Reclamation can prepare post-2026 Colorado River operating guidelines and develop a course of action to improve the stability and resilience of the Colorado River Basin in a manner that supports the chances that this binational partnership can continue.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21066	9	SUSMANAGE - Sustainable, reliable, and adaptive management	I have been a Lake Powell boater since 1984, and hope to continue to enjoy Lake Powell access into the future. Throughout the years I have seen it from full at 3700 to the low this spring at 3519. I am hopeful that a compromise can be reached for all user groups that will benefit the regional economy, recreationists, the preservation of natural and cultural resources, and satisfy water delivery consistent with USBR's mission.		Tiffany Mapel
21094	2	SUSMANAGE - Sustainable, reliable, and adaptive management	Last, measures must be included in the Post-2026 Guidelines that will protect the river itself, the fish, wildlife, and the plants that depend on the river.	Southern Ute Indian Tribe	Melvin Baker
21094	14	SUSMANAGE - Sustainable, reliable, and adaptive management	The Post-2026 Operating Guidelines should not only deal with management of Lake Mead and Lake Powell but should also consider the integrity and health of the Colorado River and its tributaries. Many tribes generally look 100 years into the future when making plans for their tribal members so that they account for future generations. The Post-2026 Operating Guidelines must account for future generations as well. The Post-2026 Guidelines must provide water security for the people in the Colorado River Basin; it should be flexible enough to address continuing drought and climate change; and it should allow for a variety of responses so that all sovereigns and water users are not managing a new crisis every few months. The NEPA process should be a comprehensive process used to identify all possible impacts to the Colorado River as a whole, which would include impacts to human uses, wildlife, fish, plants, social, and cultural uses.	Southern Ute Indian Tribe	Melvin Baker
21104	4	SUSMANAGE – Sustainable, reliable, and adaptive management	4. Balance preservation of natural systems (fisheries, public lands) with engineering needs (power pool elevations, water supply for agricultural use)		Lily Bosworth
21115	2	SUSMANAGE - Sustainable, reliable, and adaptive management	AMWA's member agencies in the Basin have diverse needs; therefore, we encourage the Bureau of Reclamation (Reclamation) to ensure that its development of the post-2026 guidelines and related federal actions on the Colorado River will: [...] * Provide robust federal support for demand reduction strategies. Robust federal support for demand reduction strategies should include adequate funding for reduction measures as well as federal research and organization of peer-to-peer information sharing. Reclamation should also consider supporting water agencies by developing criteria for managing facilities, reservoirs, and projects for human health and safety operations, ensuring that agencies have certainty and predictability even under the potential for further reservoir declines.	Association of Metropolitan Water Agencies	Thomas Dobbins
21302	17	SUSMANAGE - Sustainable, reliable, and adaptive management	Water Transactions. The EIS should include an analysis of the varying types of water transactions that Colorado River users could engage in to support mitigation and adaption, including forbearance agreements, intra-state transfers, leasing arrangements, water right sales, trades, and water exchanges. For example, Reclamation could analyze water leases and transfers between on-river users and CAP users. By including the analysis in the EIS, Reclamation can help to streamline the process for users to develop and engage in water transactions that can support water risk sharing and reduce dependence on the Colorado River.	City of Phoenix	Cynthia Campbell

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21302	30	SUSMANAGE - Sustainable, reliable, and adaptive management	As part of this NEPA analysis, Reclamation should (1) analyze the potential impacts and benefits that landscape level investments could have for management of reservoirs and the system as a whole and (2) consider how operational criteria for the reservoirs will or will not support these investments. Managing and com batting aridification and the impacts of climate change will require more than reservoir management. It will require broad investments in forest management and restoration of forest health, improvement of rangeland conditions, increasing the efficiency of agriculture, and the restoration of tributary streams and natural storage systems that can help insulate vulnerable natural systems from drought and climate risk. The potential value of these investments as a means of managing Colorado River system risk should be analyzed, including as a means of mitigating the risks that will be associated with any operational guidelines that are ultimately selected. For example, as part of its supportive analysis of desirable transactional behaviors, Reclamation could set goals in the new operating guidelines that would encourage better coordination of investment efforts among federal agencies, such as aligning other federal spending programs with broader system management goals (e.g., Farm Bill programs that promote investments on private lands that promote watershed health, natural storage, forest and rangeland conditions, or increase agricultural conservation) and increase its coordination with other federal and state agencies and public land managers to promote watershed health, natural storage, forest and rangeland conditions, reduce dust on snow, and combat landscape level aridification that is driving hydrologic decline.	City of Phoenix	Cynthia Campbell
1209	1	VEG - Vegetation	Please be sure that water from the Colorado River is shared with plants		Susan Fong
1295	1	VEG - Vegetation	Please insure that water from the Colorado River is shared with plants		Susan Fong
1957	5	VEG - Vegetation	improving forest health,		Kimberly Hall
20473	4	VEG - Vegetation	Utilizing IRA Funding to Restore Eco-System and Address Invasive Species Another major reason for losses is non-native vegetation along the riverbanks. Tamarisks were introduced to the Colorado River by the federal government during the 19th century. They have spread downstream (continue to be transported by HFEs) and are choking out native vegetation and consuming precious water resources. Eliminating tamarisks would help preserve the amount of water for consumptive use downstream. Part of the IRA includes funds for eco-system restoration. We are asking that the Bureau of Reclamation pursue the funds in the IRA for the following: * Removal of the tamarisks to restore riverine habitat. * Thinning the forests in the watershed to improve runoff, therefore, impacting ecosystem system restoration.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20490	44	VEG - Vegetation	Scenarios where Lake Powell drops below powerpool would preclude any future HFEs and create a less dynamic range of flows through Grand Canyon. This would likely increase the density of non-native riparian vegetation, promote non-native riparian monocultures, decrease diversity of native vegetation species, promote channel narrowing, and negatively impact riverine ecosystem functions.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20617	1	VEG - Vegetation	In the 16 years since the 2007 Interim Guidelines were established, climate and environmental conditions have changed and consequently the environmental resources impacted by Colorado River management have also changed. The most notable environmental resource not considered in the 2007 Interim Guidelines is the ecological resources above Glen Canyon Dam that have established below full-pool Lake Powell elevation since 1999. At Lake Powell's all-time low elevation in April 2023, over 100,000 acres of previously-inundated land was exposed and terrestrial ecosystems were re-establishing. Exposed areas of land include large relatively flat bays, rocky talus slopes and tributary canyons, both with and without perennial streams. Since 1999, ecosystems have established on landscapes that were once inundated by the reservoir. Many ecosystems, especially those near perennially flowing creeks or those that emerged more than 5-10 years ago, are comprised of mostly native plant species. When the Environmental Impact Statement (EIS) for the 2007 Interim Guidelines was developed, terrestrial ecological resources in the Lake Powell region were still developing and riparian ecosystems were in early stages of succession. As the EIS for Post-2026 Colorado River Operations is being considered, ecological resources in the Lake Powell region are now well- established in many locations. Landscapes in the Lake Powell region above 3,661 feet have had 22-25 years to undergo spontaneous ecological succession, locations above 3,636 feet have been exposed to terrestrial ecological succession since 2011 and locations above the 2023 high-water elevation of 3,585 feet have been exposed to successional processes for at least three years. The EIS for the 2007 Interim Guidelines did not consider emerging ecological resources in the Lake Powell region because they were not yet established. The upcoming EIS for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead must consider the impact of water storage in Lake Powell on ecological resources in the Lake Powell region that have established since 1999.	Western Water Assessment	Seth Arens
20617	2	VEG - Vegetation	The EIS for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead should include an effort to survey and evaluate ecological resources in the Lake Powell region. Landscapes previously inundated by Lake Powell have developed rich, thriving and diverse native ecosystems over the last 23 years of drought in the Colorado River Basin. Many of these landscapes are hot-spots of biodiversity in the arid landscape of the Colorado Plateau.	Western Water Assessment	Seth Arens

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20617	3	VEG - Vegetation	Considering basin water consumption, current climate and future climate projections, it is unlikely that Lake Powell and Lake Mead will again refill. Given this likely scenario, there are management decisions that could be made to maintain some of the ecosystems that have re- established in the Lake Powell region. However, the ecological resources in the Lake Powell region below 3,700 feet must first be acknowledged, surveyed and studied in order to make responsible management decisions regarding environmental impacts to these systems. I sincerely hope that the Bureau thoroughly considers the impacts to the ecosystems that have re-established since 1999 in the Lake Powell region in the EIS for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. The last 23 years of drought have caused tremendous disruption and uncertainty to water supply in the Colorado River Basin. The re-establishment of rich and diverse native ecosystems in previously inundated portions of Glen Canyon is one of the few positive impacts of the megadrought and I have optimism that effective planning and management by the Bureau of Reclamation can help maintain these vibrant ecosystems.	Western Water Assessment	Seth Arens
20899	12	VEG - Vegetation	Riparian and Aquatic Habitat Issues As part of the EIS review, direct, indirect and cumulative impacts to riparian and aquatic habitats from operations must also be fully considered. Changes in water flow and seasonal releases can have profound affects on riparian and aquatic habitats, the species that depend on them, water temperature, stream structure and other factors that must be fully considered in the EIS.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	31	VEG - Vegetation	17. Perform CRB vegetation assessments that highlight the status of invasive, non- native and native species on water quantity and quality.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	23	VEG - Vegetation	Reestablishing Vegetation As the reservoir levels have dropped, a large-scale ecological succession is taking place in Glen Canyon and its side canyons, tributary rivers, and streams. In Spring of 2023, with over 40 new miles of the Colorado River flowing once again in what used to be the northern reach of Lake Powell, 40 miles on the San Juan River, 13 miles flowing on the Escalante River, 10 Miles on the DIrty Devil River, and hundreds of linear miles of creeks and stream flowing in the 100-plus side canyons of Glen Canyon, the ecosystems surrounding Glen Canyon are rebounding. In many once-drowned tributary canyons of Glen Canyon, well-established groves of native species like Goodings Willow, Coyote Willow, and Fremont Cottonwoods are thriving54. These riparian forests are of great significance in many places throughout the Colorado River Basin, with resource managers going to great lengths to restore and protect them. Recent research has documented the return of plant life in the emerged canyons, which is many places has an abundance of native plant species such as globemallow, wirelettuce, scorpion weed, sacred datura, four wing salt bush, matted crinkle mat, wooly plantain, Jone's blue star, woody aster, desert trumpet, milkvetch, sticky brittle bush, purple three awn, common pepperweed, threadleaf sunflower, Indian rice grass, sand sage, and prickly pear cactus [see graphic in attachment] A new and ongoing vegetation survey57 led by researcher Seth Arens of Western Water Assessment is looking at the vegetation composition in emerged areas in Glen Canyon, and has found that areas that have been out of water for more than 2-3 years are generally dominated by native plant species like willow and cottonwoods58. As of summer 2023, the survey has established 89 transects in 20 locations throughout Glen Canyon. [see graphic in attachment] It should be noted that the findings of this vegetation survey are a stark contrast to the descriptions of emerging ecosystems in the 2023 DSEIS. The impact analysis of that EIS acknowledges on page 233 that the agencies lack any reliable data on new vegetation in Glen Canyon, stating,"Vegetation monitoring does occur in the upland areas of the recreation area, but no studies have been conducted on the riparian habitat along the lakeshore."60 Then it contradictingly claims,"currently, tamarisk and Russian thistle are the dominant vegetation type along the shores of Lake Powell. Dense stands of tamarisk displace native plants, degrade wildlife habitat, reduce livestock forage, limit human access, interfere with the natural fluvial process, and increase the risk of severe wildfires." This description of new vegetation and ecological succession in Glen Canyon is woefully inaccurate, and based on outdated, anecdotal, or non-existent data. In order for decision makers to accurately weigh the impacts of water operations on the ecosystems in Glen Canyon, a thorough study of its ecosystems must be incorporated into the decision making assessment and process.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	28	VEG - Vegetation	There has also been significant ecological succession on the mainstem Colorado River in Cataract Canyon below full pool elevation. Vegetation surveys by Seth Arens of Western Water Assessment70 have shown a snapshot of what those plant assemblages look like from survey work at several sites at tributary canyons within Cataract. A summary of the study states: "Across all sites and years, 44 vascular plant species were observed in belt transects. At sites above 3,700 feet and not flooded by Lake Powell, 41 plant species were observed; at sites below 3,700 feet, 28 plant species were observed. Plant species present in transects were generally typical to Colorado Plateau upland desert and riparian ecosystems. Several previously flooded sites were dominated by native shrub species (coyote willow and seep willow), had lower abundance of non-native plants and native shrubs were generally more abundant than the non-native tamarisk." [see graphs in attachment]	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20915	2	VEG - Vegetation	The following are some scoping questions that are relevant to the post-2026 Colorado River operations and the potential conservation benefits of healthy soils in the Colorado River watershed: 1) What are the potential impacts of different post-2026 Colorado River operations on healthy soils in the watershed? 2) What are the opportunities for conserving healthy soils in the Colorado River watershed, including through the application of compost on working lands? 3) What are the costs and benefits of different soil conservation strategies, including through the application of compost on working lands? 4) What are the potential trade-offs between soil conservation and other water management objectives? 5) What are the institutional and policy barriers to soil conservation in the Colorado River watershed? 6) How can we engage stakeholders in a dialogue about the future of soil conservation in the Colorado River watershed? 7) What are the specific definitions for what qualifies as saving water and what qualifies for receiving funding for saving water, and how can healthy soils be included as a goal? 8) For farmers, ranchers, tribal communities, and cities who receive water from the river, how can healthy soils be included as a requirement to help with water conservation, water quality, and carbon sequestration? 9) Can water quality be included as a requirement for consideration of valuing return credits? For example, if returned water is cleaner and of higher quality than received water, as by being filtrated through healthy soils, can that result in a higher price for return?		Andy Shrader
20943	2	VEG - Vegetation	I have been lucky enough to visit many of the well known and lesser known side cantons of Glen Canyon as it emerged from under Lake Powell over the last years. In that time, I have witnessed... Cottonwoods and willows in places tower 20 feet high Â— an incredible feet given just a dozen years of recovery. In other places, hanging gardens are rebuilding their delicate balconies of maidenhair fern and stream orchids. IÂ'd hate for us to lose all of this.		Max Lowe
20952	28	VEG - Vegetation	We recommend that the Draft EIS assess the potential direct, indirect, and cumulative effects upon existing aquatic resources which may include changes in surface and groundwater hydrology supporting streams and wetlands or functional conversion of wetland types. Describe how the project would comply with Executive Order 11990, Protection of Wetlands, including how wetlands would be identified and avoided. To the extent adverse effects to wetlands are unavoidable, discuss the loss or degradation of wetland functions and values, the assessment method used to make these determinations, and how such impacts would be minimized, offset, or mitigated. If wetlands on federal lands are going to be impacted, EPA recommends offsetting mitigation based on a functional replacement approach rather than acre-to-acre replacement to ensure that the specific wetland functions are replaced in an ecosystem. The EPA notes that conversion from one type of wetland to another will likely result in the loss or degradation of certain wetland functions, but that any assumptions regarding wetland quality and function should be field verified using an assessment method appropriate for the region. EPA further recommends post-2026 monitoring for potentially adverse effects to wetland functions.	Environmental Protection Agency Region IX	Robin Truitt
21157	2	VEG - Vegetation	The current management of Glen Canyon as a storage container is detriment to the needed riparian corridor across Arizona and Utah and Lake Powell is not a riparian corridor. Lake Powell creates a void of riparian habitat. Lake Powell is not healthy for the land scape, the river scape, the flora and fauna of these regions. The side effect of the recreation community at Powell and its financial contribution to the region is noted; the economy is not more important the healthy and functioning eco system of the Colorado River; a revised econ plan for a returned Glen Canyon will mimic the the current rec economy.		Sam Carter
21159	2	VEG - Vegetation	For example, it is well-researched that the native flora is much better acclimated to growing in the drying region, and I'm sure there are policies in place to dissuade exotic plant use, but making sure this is uniformly enforced throughout the basin seems necessary. The use of of a diversity of native plants solves so many issues at once: it is something I am incredibly passionate about. This rings especially true in the industrial agricultural sector in the Lower River Basin, as it has been shown for years now that their practices are mostly responsible for the drying of the river basin: infrastructural reform in agriculture is necessary.		Jack Dotzler
21168	1	VEG - Vegetation	I would like to see the EIS include consideration of these side canyons and their recovering riparian systems. These canyons that have been "drowned" by Lake Powell are National Park quality terrain in their own right. The lower Lake Powell gets, the better and more spectacular canyons emerge.		Steve Cole

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Form 6	-	WATDROUGHT - Water Conservation/Drought	The Colorado River Basin is a vital source of water for millions of people, but due to poor management and greedy agribusiness corporations, the water supply of over 40 million people is a risk. Climate change, extreme weather, and mega-droughts further endanger water access. That's why I ask that you prioritize households before big ag when developing plans to converse water in the Colorado River Basin. Food & Water Watch has issued a new report detailing the abuse factory farms, and agribusiness have to the region's water. It's time to stop this abuse of our water resources. Please prioritize households, communities, and wildlife over agribusiness greed.	Food and Water Action	
Form 7	-	WATDROUGHT - Water Conservation/Drought	Reduce water use across the Basin by 25%.	Western Resource Advocates	
30	2	WATDROUGHT - Water Conservation/Drought	Keep in mind that Imperial Valley and the Yuma area are the gardens of the United States. Imperial and others have been wasting water because they have feared (as all entities with water rights fear) that if they did not take it they could lose it.		
30	5	WATDROUGHT - Water Conservation/Drought	What right do some recipients of Colorado River water have to waste water when others' taps are dry? All recipients of Colorado River water must decrease use. Those who waste the most must decrease the most.		
50	1	WATDROUGHT - Water Conservation/Drought	Letâ€™s save water for drought seasons, even California would Benifit by being more conservative now and have more water later. Please be more consistent through good and bad water years.		Kurt Allen
123	2	WATDROUGHT - Water Conservation/Drought	Please make the laws so that when we are in a drought the states down stream canâ€™t take as much water. Itâ€™s usually a drought and that takes way too much water out of lake Powell. We have been recreating there for my whole life, it is a family tradition and together time. My extended family is close because of these lake Powell traditions and fun. Change the agriculture laws especially in drier states so they canâ€™t take the majority of water, conservation starts at the level that takes the most water and there needs to be laws against states that take the majority for agriculture that doesnâ€™t need to be grown in a dry state! Grow things that needs less water.		Lisa Webster
157	2	WATDROUGHT - Water Conservation/Drought	I would also like to point out that any recommendations to drain lake Powell are not plans of good stewardship. It is plan to see that draining lake Powell to prop up lake Mead is only a band aid to the much larger issue of water conservation in dessert states. With the effects of global warming increasing, reducing our storage capacity to one lake will only exacerbate issues for our children and grandchildren. It is beneficial to store as much water as possible in the form of two lakes, to save in times of need. The true solution can be taken from the simple economic principle of â€™spend less than you earnâ€™. It is important that we learn to better conserve our scarce and dwindling resources, instead of push the responsible to future generations, as so many have before us. There are no excuses to fail to act appropriately and seize the opportunity to learn to adapt to our landscape, and environment.		Todd Kartchner
173	1	WATDROUGHT - Water Conservation/Drought	Water preservation in Lake Powell is of paramount importance, especially in light of the years of over-releasing water during droughts. The announcement by the Bureau of Reclamation regarding the scoping period for updating the 2007 Interim Guidelines for the Colorado River Management Operations marks a crucial step in addressing the water management challenges faced by Lake Powell and Lake Mead. As water resources continue to face increasing pressures due to population growth, agricultural demands		Nick Wible
194	1	WATDROUGHT - Water Conservation/Drought	The westâ€™s resources are being raped to provide for other states needs. This is wrong on many levels. The water sent downstream needs to correspond to the snow pack each year.		Lynn Brothersen
196	1	WATDROUGHT - Water Conservation/Drought	I have watched the lake levels rise and fall. Slightly disturbing to me to see so much water being taken out when we are struggling in a drought in our area.		Heidi Rich
284	1	WATDROUGHT - Water Conservation/Drought	I would like to voice my concern and ask the bureau to reconsider releasing so much water. It seems wise to store more water especially where very recently weâ€™ve had record lows on the lake. Ever since I was a kid, a lake power with more water has been more of a novelty. Thank you for your consideration!		Drew Hunt
309	1	WATDROUGHT - Water Conservation/Drought	Donâ€™t release water from lake Powell until itâ€™s full or above full limits. We have a good chance to sustain this amazing lake for years to come and generations after if we ate smart. Letâ€™s take advantage of this record year and hope next year is good tooâ€¦ Iâ€™ve loved going to lake Powell for over a decade and itâ€™s been a huge part of the love I have for Utah going there with friends and family. Please preserve the water so we can continue to love it for years to come even if there are some drier winters ahead		Kenton Jones

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309	2	WATDROUGHT - Water Conservation/Drought	Donâ€™t release water from lake Powell until itâ€™s full or above full limits. We have a good chance to sustain this amazing lake for years to come and generations after if we ate smart. Letâ€™s take advantage of this record year and hope next year is good tooâ€¦ Iâ€™ve loved going to lake Powell for over a decade and itâ€™s been a huge part of the love I have for Utah going there with friends and family. Please preserve the water so we can continue to love it for years to come even if there are some drier winters ahead		Kenton Jones
346	1	WATDROUGHT - Water Conservation/Drought	The lake used to be so beautiful and fishing was good. Changing the water levels. Often distrusts the wildlife and fishing. The boating is harder and if we have a year of drought the water levels being lowered the drought is harder as we donâ€™t have any water saved.		Melissa Turner
361	1	WATDROUGHT - Water Conservation/Drought	It is important that we save Lake Powell as a water reservoir for potential future dry years. We have led this lake into a drought that threatens the future of this crucial water reservoir.		Mia ONeil
367	1	WATDROUGHT - Water Conservation/Drought	Lake Powell has been our family destination for the past 25 years! We need to responsibly manage growth and water usage.		Richard Wheeler
388	1	WATDROUGHT - Water Conservation/Drought	Obviously the planet is experiencing an unprecedented time of rising temperatures and mostly unseen dry conditions. In places where rain is scarce, itâ€™s imperative to conserve what water falls, when it does.		Danielle Steigerwald
401	1	WATDROUGHT - Water Conservation/Drought	The amount of water let out should depend on the inflows. The outflows should never be bigger then the inflow.		Carter Anderson
468	1	WATDROUGHT - Water Conservation/Drought	Keeping Lake Powell at high levels allows for emergency water and eletrical supply. This is critical for drought years. I think we need to be conservative in storage and usage.		Nick Nielsen
477	1	WATDROUGHT - Water Conservation/Drought	I say simply compare water conservation numbers. Utah when asked to conserve water will gladly do so during a drought and our golf courses go yellow and most everyoneâ€™s lawns dry up. However Californians and Nevada people are not the same they key wasting water in even hotter temperatures kind you water that they never see unless itâ€™s coming out of there sprinklers. They donâ€™t come to lake Powell they donâ€™t pay taxes in our state why should they get any of the water we conserve. Itâ€™s flawed we sacrifice to have great reservoirs and they steal our hard work. Imagine if Utahns decided to keep our courses and lawns always green then there would be no reservoirs theyâ€™d dry up as it is they are hanging by a thread. Use the billions of gallons of treated grey water that gets pumped into the ocean so what if it was grey water itâ€™s watering a lawn and it was treated donâ€™t waste it		Brad Haroldsen
528	2	WATDROUGHT - Water Conservation/Drought	allowing states that donâ€™t use their own resources to collect water hurts us and so many others please something has to be done. Like holding states like California accountable for relying on us to support them and not doing anything to catch their own runoff.		Colton Roberts
575	2	WATDROUGHT - Water Conservation/Drought	We love Lake Powell and pray that it can continue to stay at a sustainable level for recreational purposes as well as retaining water for use during impending serious droughts.		Shavonne Updike
613	1	WATDROUGHT - Water Conservation/Drought	Draining Lake Powell is not the solution to water shortages. Restricting unneeded water use is the solution. Stop allowing homeowners and businesses to plant grass in their front yards solely for looks when they are located in the Arizona dessert. Crack down on illegal and legal marijuana growing, an industry that uses an incredible amount of water in California and is not a necessity. Restrict the amount of water households can use per day. The answer is not to keep ignoring climate change.		Kelly ONeill
618	1	WATDROUGHT - Water Conservation/Drought	Fill powell raise the cost of water in the west. Itâ€™s a scarce resource and agriculture in arid land takes too much of a share. I xeriscaped my whole 3/4 acre lot in Utah because this is my problem too, not just the farmers.		Trevor McCleery
651	2	WATDROUGHT - Water Conservation/Drought	They need to step up to the table big time and participate in a reduction of their use. Granted, the majority of their usage is in the Imperial Valley for agriculture, but we need to look at growing different crops with different methods of more efficient irrigation. Arizona is currently foregoing large amounts of water from the River and I imagine will have to continue to do so in the future. Nevada is probably the state that is most active in water use reduction. All 7 states need to look at what Nevada has done and implement the same programs in their states. The reductions must come from all the states involved. The BOR asked the 7 states to come up with a plan to reduce consumption by 3maf per year. After missing the first 2 deadlines, the lower basin states came up with a plan to save 1 maf in 3 years. If the states can't do the job, the BOR is going to have to get tough and make the hard decisions necessary to keep the river alive.		Steve Davis
652	1	WATDROUGHT - Water Conservation/Drought	Conservation is the most affective way of cutting back water use (low flow toilets, appliances, landscape solutions, paying for removal of grass, recycled water, repurified water).	Helix Water District	Kathleen Coates Hedberg

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652	3	WATDROUGHT - Water Conservation/Drought	I also, would suggest you look at the State of Arizona and encourage them to do more with conservation and new water supplies, the City of Phoenix water bill is a mere $15 for over 7480 gallons (and this is there new rate increase s). That same amount costs us over $100 a month . There is room for the City of Phoenix to pay for conservation, improvements and reuse. Equity. We all need to have water, every drop is valuable from the Colorado River and we should ALL share, conserve and reuse.	Helix Water District	Kathleen Coates Hedberg
652	4	WATDROUGHT - Water Conservation/Drought	I just saw an article from the City of Lake Havasu, they are considering putting their effluent back into the Lake what a great start! Lets support this project! And others like it.	Helix Water District	Kathleen Coates Hedberg
663	1	WATDROUGHT - Water Conservation/Drought	Efforts to assure recycling of domestic water similar those in place in Nevada should require a commitment of 40% plus of all residential & commercial water use be recycled by 2036.		Neil Fischnaller
663	2	WATDROUGHT - Water Conservation/Drought	The historical prioritization of water allocated to agriculture needs to be re-evaluated. Significant conservation targets need to be put in place to reduce agricultural use by as much as 30% or more in the long term. Agriculture can move to crops which require less water, but this requires some lead time, so the targets put into place should graduate from an initial 10% reduction increasing to 20% or greater by 2034, and 30% by 2041. Arizona & California should not be growing crops such alfalfa, and almonds which require significant use of water. Production of many of these crops could be re-located to areas of Texas or other areas which receive much more natural rainfall. Moving these agricultural areas to water saving crops such as Agave will assure a growing industry.		Neil Fischnaller
836	1	WATDROUGHT - Water Conservation/Drought	Don't build houses that will depend on it for a source of water.		Peter Ayres
1073	1	WATDROUGHT - Water Conservation/Drought	Protecting it for future generations is essential.â€¯ And I am writing to ask you to please remember this. I live downriver of the Colorado and I wonder about the water wasted in golf courses, water displays and the like, enormous population growth, even here in New Mexico. Perhaps you should seriously consider limiting building in wster-stricken areas.		Mia Kalish
1957	1	WATDROUGHT - Water Conservation/Drought	Things that we can do to help the Colorado basin include reducing water use (I'm looking at you, Los Angeles),		Kimberly Hall
2001	1	WATDROUGHT - Water Conservation/Drought	I also believe that some things should be denied like the horrific toll that Las Vegas has on the water supply and other communities that don't take water considerations into their delelopment plans.		Linda Kroeger
2336	2	WATDROUGHT - Water Conservation/Drought	The choice of each town, city, and state to grow irresponsible with no regard for water security should no longer be encouraged. Our current water laws have not been updated, they are still based on supporting development and not sustainability. The days of â€œendlessâ€ supply are long gone, but local government, AMAs, etc. are riddled with conflicts if interest. Who has ever heard of developments sitting on water boards! We need federal help to take the foxes out of the henhouse. A perfect example is Prescott Valley, a town practically owned by one family who salts every council, every committee, etc. in order to support their build, build, BUILD agenda utiluzing effluent water credits and loopholes in Arizona State Water Law. MAKE AN EXAMPLE OF THIS TOWN, fifth largest in Arizona.		Patricia Betzhold
2670	1	WATDROUGHT - Water Conservation/Drought	There should be less use of agriculture for cattle feed.		Sarah Brown McClain
2676	2	WATDROUGHT - Water Conservation/Drought	â€¯FILLING SWIMMING POOLS IN DESERT STATES SHOULD NOT BE A REASON TO FURTHER DEPLETE THE COLORADO!		Carole G. Whitehead
2739	1	WATDROUGHT - Water Conservation/Drought	Future generations have to realize that Development and industry cannot be added to the already stretched resources of the Colorado river. I feel there should be a moratorium on future development.		Mary Caruso-Albert
2795	1	WATDROUGHT - Water Conservation/Drought	We need to suspend new residential and commercial development in the states bordering the Colorado River. we also need to limit and reduce farming in those states as well. We have not properly managed the water resources in these states and are now facing an environmental disaster of enormous proportions.		Jeanne Grifo

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2824	1	WATDROUGHT - Water Conservation/Drought	In the decade that followed, it became clear that the drought-which had initially been seen as part of the cyclical pattern of wetter and drier periods observed as alternating throughout the prior century-is actually a more permanent, structural phenomenon resulting in large part from worldwide climate change. This structural change largely accounts for the deep shortages in Colorado River flows in the past several years that have led to the present necessity for the Department of the Interior to impose drastic reduction of water deliveries in the Lower Basin in order to preserve long term system operations.	Hualapai Indian Tribe	Hannah Waldrop
2908	2	WATDROUGHT - Water Conservation/Drought	Humans caused the low water issues. Humans must solve the problem by lowering their water use.		Kathryn Hiestand
3150	1	WATDROUGHT - Water Conservation/Drought	We as people need to drastically reduce our uses of water - we waste too much. I support efforts to encourage less usage.		John and Linda Peck
3180	1	WATDROUGHT - Water Conservation/Drought	Water is always going to be scarce in the Southwest. Human populations need to adjust in demand or choice of location.		Jeffrey Tischler
3503	1	WATDROUGHT - Water Conservation/Drought	The political football of "climate change" actually deflects us from facing up to humanity's more direct impact on the Colorado river system, most notably population centers such as Phoenix AZ which drain the river of millions of gallons every year.		Carl McKenzie
3853	1	WATDROUGHT - Water Conservation/Drought	Protecting it for future generations is essential.â€¯ And the only answer is to basically halt development.		Wayne Goin
4426	1	WATDROUGHT - Water Conservation/Drought	Because desert states like Arizona donâ€™t have their own water sources, there needs to be regulations regarding how water is used. Things such as irrigated grass lawns and golf courses should not be allowed. Homeowners should have desert yards and no swimming pools. Golf courses can convert to artificial grass and no irrigation to save water.		Suzanne Ramthun
4983	1	WATDROUGHT - Water Conservation/Drought	The Colorado River is a vital lifeline and we must reduce human use of the waters therein.		Bruce Moehlman
5209	1	WATDROUGHT - Water Conservation/Drought	The massive exploitation of this river must be reigned in before it is ruined. Completely wasteful uses of it's water must be stopped such as for watering lawns, being diverted to the Front Range cities and unnecessary agricultural use.		Marc LeMaire
5479	1	WATDROUGHT - Water Conservation/Drought	I support actions to PREVENT Colorado River water being used for high water use agriculture. There are crops now supported that should NOT be grown in desert areas. Agricultural should be limited to crops that use minimal water and have a secure water supply without taking water from other essential uses.		Susan Selbin
5579	2	WATDROUGHT - Water Conservation/Drought	We humans can do without green in naturally brown landscapes, long showers when we have to dam rivers to achieve them, swimming pools in our yards just because we can, and fountains with no purpose but an exaggerated display of privilege.		Anne Wallace
5706	1	WATDROUGHT - Water Conservation/Drought	Please reduce allocations for golf courses and farming water thirsty crops in desert lands. Therre is not enough water to wisely continue such uses.		Martha Martin
5989	1	WATDROUGHT - Water Conservation/Drought	The several plans to drain even more water from the Colorado to enable even more unsustainable growth must not be allowed.		Joel Vignere
5995	2	WATDROUGHT - Water Conservation/Drought	Another is to lower the usage of each person of the resource. That is stopgap at best if the population continues to grow.		Eric Thompson
6107	1	WATDROUGHT - Water Conservation/Drought	It's completely unacceptable that the Colorado dries up before it reaches the Pacific Ocean. Water uses like irrigation of desert land in Arizona for agriculture fly in the face of common sense and are unsustainable. The overuse of water in Nevada for water features in Las Vegas, which is a desert, is ridiculous. The development surrounding Vegas is replacing native desert species with palm trees and grass that require a lot of water. This should not be supported. Waste needs to be addressed.		Leslie Edwards
6256	1	WATDROUGHT - Water Conservation/Drought	ANIMAL AG IS TAKING THE wATER. ANIMAL AG IS DESTROYING MOTHER EARTH AND HER ABILITY TO SUSTAIN LIFE AND LIFE SYSTEMS. REPLACE ANIMAL AG W PLANT-BASED FOOD PRODUCTION, FORESTS, WILD LIFE ROAMING FREEDOMS & HABITAT RESTORATION, RANCHING W MAnaGEMENT AND STEWARDSHIP, GREEN ENERGY PRODUCTION, COMPOSTABLE & BIODEGRADABLE ALTERNATIVES TO PLASTICS ETC.		Yvette Tapp

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6288	1	WATDROUGHT - Water Conservation/Drought	The river is over- prescribed yet those who believe they have not had their fair share are planning to stake their claim and threaten its further existence. Growth of cities and towns demanding more water is not sustainable. Water intensive farming methodologies must be revised. I urge you to think of the needs of wildlife equally along side human needs.		Rae Deane Leatham
6698	1	WATDROUGHT - Water Conservation/Drought	Water is the life blood for all creatures living on the Earth. All life forms must be supported, and the Colorado river must be protected to perform this essential function.		Cathy Popp
6762	1	WATDROUGHT - Water Conservation/Drought	I support better ways to reduce the amount of Colorado River water used to keep reservoir levels higher and flows stronger for the long-term.		Bruce Hlodnicki
7827	2	WATDROUGHT - Water Conservation/Drought	In order to preserve the biodiversity and the ability of humans to live there we cannot continue operating unsustainable industries in the region that require large quantities of water to sustain them. Growing water intensive crops or running large dairy operations make no sense. If we fail to address these issues the consequence will undoubtedly be serious.		Richard Van Aken
8895	1	WATDROUGHT - Water Conservation/Drought	Giving so much water to more golf courses and fountains will destroy this cherished river.		Melissa A Riparetti-Stepien
8934	1	WATDROUGHT - Water Conservation/Drought	Colorado River water must no longer overused by agriculture, urban communities and forest management. Agriculture must no longer rely so heavily on the Colorado for irrigation by eliminating bad industrial practices in favor of regenerative methods that preserve and enhance local water resources. Urban communities and forestry must enact similar reforms.		David Newman
9184	2	WATDROUGHT - Water Conservation/Drought	I see a lot of the use of water wasted to lawns, down the drain, sending water to Phoenix when Flagstaff needs it for our aquifer, and full plastic water bottles on the ground.		Randie Holloway
9219	1	WATDROUGHT - Water Conservation/Drought	All sources of FRESH WATER needs to be conserved & preserved.		Nancy Kassim Farran
9269	1	WATDROUGHT - Water Conservation/Drought	Recycling of used water from the Colorado as well as from all water sources throughout the Southwest must be a Priority. Reduced use and Recycling of used water must be the Standard for All Communities in this Region.		Thomas Kessler
9405	1	WATDROUGHT - Water Conservation/Drought	With the advancement of city growth, agricultural demands and extreme drought , everything that we do must be done to protect our waterways and watersheds!		Julie Kiley
10549	1	WATDROUGHT - Water Conservation/Drought	I would also advocate for less water be directed to California: they have exceeded the portion of water allocated to them year over year. This is a state that advocates for air pollution and road management but does nothing to reduce/modify consumption of water.		Dee Olson
10698	2	WATDROUGHT - Water Conservation/Drought	CONTINUED HOUSING DEVELOPMENTS IN THIS ARID PART OF OUR COUNTRY MUST STOP. GOVERNMENT SHOULD BE WORKING WITH CORPORATIONS THAT CONTINUE TO MOVE MANUFACTURING AND SERVICES JOBS TO THE DESERT.		Patricia Reynolds
11309	1	WATDROUGHT - Water Conservation/Drought	Allowing Colorado River water to be used to grow food sold to China et al or for other environmentally destructive agriculture and animal husbandry (eg ranching) is a type of use for profit that should be eliminated. Humans need new habits, and condoning anything for profit as a "success" in our culture is one pattern that must be changed.		go Clemson
11330	1	WATDROUGHT - Water Conservation/Drought	In my 24 years as a Coloradan, Iâ€™ve watched as the Colorado River flow has diminished due to the 7 basin states diverting more of its water than is feasible. The appropriate use of this river is important to me and to the wildlife that depend on it.		Linda Hodges
11468	1	WATDROUGHT - Water Conservation/Drought	Water is life it is vital to all life here. We must shift and change our mindset and treat it as our valuable resource for all life.		Jd Malonson
11642	2	WATDROUGHT - Water Conservation/Drought	Water is essential and you are wasting trillions of gallons in storage and providing water for massive housing developments in the desert that waste billions more. Change your policies, regulations and priorities.		Teresa Seamster
11684	1	WATDROUGHT - Water Conservation/Drought	we have reached the crisis point. Too many users, not enough water. Difficult decisions have to be made.		Kris Brown
11840	1	WATDROUGHT - Water Conservation/Drought	Where much of this country has plenty of water, most of the land bordering the river is in dire need of water to support all the life around it.		Leilani Rothrock

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12115	1	WATDROUGHT - Water Conservation/Drought	I worry about what will happen to the residents of the 7 states that depend on the River and all the other creatures that depend on it too.		Marian Reisman
13697	1	WATDROUGHT - Water Conservation/Drought	We must act responsibly and safety secure water from this declining river and save/restore water sources for habitat.		Joyce Christy
14151	1	WATDROUGHT - Water Conservation/Drought	The need for water should have been evaluated prior to our current emergency. The need for water should have been examined when the various types of vegetation and trees were determined to be acceptable for planting. Trees and vegetables that were identified as acceptable should have been examined to be use that they were not those that required enormous amounts of water for proper growth.		Carolyn Dejonge
14297	2	WATDROUGHT - Water Conservation/Drought	The, current, river management does NOT guarantee water for the habitats that support tens of millions of birds. Essential refuges and, migration, stopovers that depend on water from the Colorado River, like the Salton Sea in California and the Cienega de Santa Clara in Mexico, as well as, global, treasures like the Grand Canyon, could go dry within our lifetime. How we manage the river, not only, impacts, countless birds, but, people as well. Communities that, already, struggle to access, clean, drinking water will be put at, further, risk if we do not change the status quo!		Diane Kastel
14384	1	WATDROUGHT - Water Conservation/Drought	This points out that we need to be much more aware of water budgets and ensure the southwest does not become an unlivable desert! Please		Lin Chambers
14516	2	WATDROUGHT - Water Conservation/Drought	I support more action to reduce the amount of water used on the Colorado River in order to protect reservoir levels and flows over the long-term [...] As you strive to find the best solutions, please identify the ways in which important environmental resources will change in future years and embrace solutions--including federal funding--to ensure that these important habitats will continue to support birds and other wildlife.		Cressida Wasserman
14545	1	WATDROUGHT - Water Conservation/Drought	No more pools in high desert country! Phoenix and Las Vegas, looking at you! No more water-intensive crops in high desert country! Alfalfa, greens.		Ka Lemon
14548	2	WATDROUGHT - Water Conservation/Drought	Cut back the cow food growing, which is a ridiculous waste of water everywhere, especially in the overheated Southwest.		Hugh McFadden
15193	1	WATDROUGHT - Water Conservation/Drought	Also please do whatever is in your power to stop factory farms and corporations from taking the water without paying significant amounts for it.		James Westbrook
15812	1	WATDROUGHT - Water Conservation/Drought	Squandering water to grow alfalfa in the desert cannot continue.		Fred Perkins
16553	1	WATDROUGHT - Water Conservation/Drought	And the encouragement of development and population growth in the desert must stop. No matter that lawns are removed and other conservation efforts are done, people still use water for cooking, cleaning, laundry, showers, etc. Phoenix and Las Vegas should not be the fastest growing cities in the country.		Gregg Oelker
17236	6	WATDROUGHT - Water Conservation/Drought	I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long term.		Erin Peffley
17384	2	WATDROUGHT - Water Conservation/Drought	we have to decide where our priorities lie and it canâ€™t be lush green lawns in arid areas. I strongly support farm irrigation for critical food crops but we do have to critically evaluate less necessary uses.		Marian Argentino
18199	2	WATDROUGHT - Water Conservation/Drought	Commercial agriculture uses huge amounts of water, much of which is lost to evaporation. Perhaps more water-retentive irrigation methods could be investigated and required of agriculture using Colorado River water.		Theresa Kardos
18314	1	WATDROUGHT - Water Conservation/Drought	We are watering golf courses in Arizona. There are many opportunities to limit waste and protect the environment.		Debra Barnhardt
18452	1	WATDROUGHT - Water Conservation/Drought	The most important action to save the river is to drastically reduce animal agriculture because the amount of water used to grow livestock feed and water the animals directly is completely unsustainable.		Samantha Miller
18777	1	WATDROUGHT - Water Conservation/Drought	We have abused and overused this river for too many decades. Most of the damage can not be undone; however we can go forward with real protections. Listen to the scientists who have studied this precious waterway.		Sherry Pennell

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19880	1	WATDROUGHT - Water Conservation/Drought	I operate under the knowledge that we are part of our natural world. What we do, impacts nature which in turn impacts us. The more we can conserve, the more we can protect the natural systems that we rely on and allow us to continue our day to day activities. Once we stop conserving important areas in nature, we screw ourselves for the long run. Our natural resource capital is negatively impacted and therefore our economic sustainability.		Sarah Meade
20172	1	WATDROUGHT - Water Conservation/Drought	That water should not be used for frivolous swimming pools but for conserving our birds and animals		Rose Herrmann
20221	3	WATDROUGHT - Water Conservation/Drought	First, the continued buildout of homes, golf courses, and general population growth shouldn't be born by sacrificing upstream water rights. Las Vegas, Phoenix, and other metropolitan areas on the lower Colorado have experienced tremendous growth, seemingly under the assumption that water is plentiful and conservation and planning is un-necessary, so someone else' problem.		Ken Jensen
20310	2	WATDROUGHT - Water Conservation/Drought	To fully incen,vize water saving efforts, there must be recogni,on and credit for as-of-yet unrecognized, on-farm conserva,on efforts. Progressive policy changes should allow for flexible management of water generated through efficiency-based conserva,on measures. To this end, IID should pursue Basin recogni,on of known, verifiable, inten,onally created conserved water, such as, but not limited to, cascading, well pod seepage recovery, crop rota,on, organic cropping, cultural prac,ces such as but not limited to drip irriga,on, on-farm seepage recovery, solid set sprinklers, overhead sprinklers, center pivots, etc. ICFB does not support fallowing as a considerable method of conserva,on due to its social, economic, and environmental impacts.	Imperial County Farm Bureau	Rachel Magos
20310	4	WATDROUGHT - Water Conservation/Drought	Over the last 20 years, California's urban/rural partnerships in on-farm water conserva,on, known as the Quan,fica,on SeVlement Agreement, has become a model of success in crea,ng dependable domes,c water supplies while enhancing the efficient produc,on of fruit, vegetable, and forage products that feed America. Because of these efforts, the Imperial Irriga,on District now conserves over 500,000 acre-feet of water every year, totaling over 7 million acre-feet since 2003. The water savings represent a 28 percent reduc,on in IID's annual usage and transfer to urban users within California. The QSA illustrates how on-farm conserva,on in California's Imperial Valley is already helping to provide dependable water supplies for California ci,es and we've pledged even more to protect Colorado River reservoirs. U,lizing California's experience, other states need to implement aggressive intra-state conserva,on partnerships. Urban/rural partnerships which invest in on-farm conserva,on free up water supplies that should have been developed to meet the increased demands from popula,on growth. Solving the Colorado River's looming shortage with urban-funded on-farm water conserva,on in the seven Basin States will be smarter, faster and more predictable than a chao,c effort to change priority rights da,ng back more than 100 years.	Imperial County Farm Bureau	Rachel Magos
20355	6	WATDROUGHT - Water Conservation/Drought	Improved water efficiency in the agricultural sector has many practitioners and offers enormous additional potential through more widespread application of recognized practices, such as the elimination of flood irrigation, lining open ditch distribution systems, converting to pressurized pipe distribution and precision irrigation, delivery on demand, evaporation suppression through solar installation or other coverings, soil sensors for irrigation timing, improved moisture retention through soil health, more use of recycled water for irrigation, and requiring agricultural water deliveries to be metered and priced at least in part by volume.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20385	6	WATDROUGHT - Water Conservation/Drought	Furthermore, elements that BOR should consider in the upcoming NEPA process include further encouragement of conservation and efficiency measures by all users,	Arizona Farm Bureau Federation	Ana Kennedy Otto
20407	3	WATDROUGHT - Water Conservation/Drought	C. Review of Beneficial Use Given the impacts of climate change and the ongoing megadrought, the Post-2026 Operational Guidelines must also ensure that water use practices are updated throughout the Basin to minimize waste. In the Lower Basin, Reclamation should implement beneficial use standards for all contractors with respect to efficiency determinations as set forth in 43 CFR Part 417. Reclamation should also ensure similar efficiency standards are implemented in the Upper Basin.	Arizona Department of Water Resources	Tom Buschatzke
20417	6	WATDROUGHT - Water Conservation/Drought	We must use less water from the Colorado River. Cities, farms, ranches, and businesses must take steps to cut water consumption by at least 25%, and we should take new, non-Tribal water development (activities that take more water out of rivers) off the table until a sustainable path has been identified. Everyone has a role in resolving our over-dependence on the River.	Western Resource Advocates	Bart Miller
20465	12	WATDROUGHT - Water Conservation/Drought	promoting water use efficiency of Colorado River supplies.	California Department of Water Resources	Karla Nemeth

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20471	18	WATDROUGHT - Water Conservation/Drought	C. Reductions in water usage can be painful or devastating for communities that rely on Colorado River water. One way for the Bureau to reduce this impact is to prioritize compensated, voluntary reductions where possible. Thus, the Bureau should include within the scope of its post-2026 process assessing efficient systems to allocate and compensate for reductions in water usage. Reductions work best where they are voluntary--and voluntary reductions happen most often when they are compensated. Growers within irrigation districts can best determine when foregoing their contractual entitlement in favor of compensation is advisable, as well as which crops to grow when and where. Local growers will be the first to understand the value of their crops and the market preference for conservation or vegetables. Conservation fiats lack the flexibility to achieve this efficient allocation. Existing programs demonstrate that this conservation format is practicable and can secure strong participation from entitlement holders. The "500+ Plan" and the "1a" and "1b" and "2" plans of the Lower Colorado River Basin System Conservation and Efficiency Program funded by the Inflation Reduction Act offer a roadmap for incentivized, voluntary compensation programs. These programs are also fundamentally fair. Where users in the Lower Basin bear the burden of conservation to stabilize the Colorado River system, compensation is both just and necessary. Compensation is fairly offered where entitlement holders forgo their contractual right to divert Colorado River water and conserve voluntarily. Compensation for these voluntary reductions encourages conservation and spurs efficient allocation of water usage in agricultural regions and beyond. More broadly, expanded market-based systems for reallocating water within the Lower Basin have significant potential to improve outcomes. After all, when one person has something valuable that another person wants, the accepted solution is a purchase and sale in a free market--not an involuntary transfer without compensation. Such markets for Colorado River water exist in limited form today, including established programs for transfers between certain agricultural and urban users within California. The Bureau has recently entertained such a transfer within Arizona in the Queen Creek matter. Although such transfers can raise policy issues, they may be a promising avenue for reallocating water use in ways that the participants find advantageous, yet which the Bureau would otherwise have no insight into or authority to impose on its own. The Bureau could play a valuable role in facilitating such markets--for example, by ensuring that market forces set prices that will maximize participation in voluntary arrangements.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	19	WATDROUGHT - Water Conservation/Drought	E. In seeking to maximize available water, the Bureau should consider whether resources exist to recycle or reclaim water. For example, graywater programs in urban areas can be useful tools for dramatically reducing the usage of Colorado River water on non-functional turf. And the Yuma Desalting Plant offers an enormous opportunity to reclaim water--perhaps even in a carbon-neutral way, given the availability of renewable energy in the desert Southwest. The Districts should be included in any conversation about providing reclamation or recycling credits to users.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	10	WATDROUGHT - Water Conservation/Drought	As mentioned earlier, uncontrolled system losses should be penalized. This would force certain parties to invest in their systems and not waste the precious water that others would love to have available to them. Multiple joint projects have occurred in the past where participating members received some of the benefits of water savings. We encourage these types of projects to continue in the future.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20478	2	WATDROUGHT - Water Conservation/Drought	The post- 2026 strategies should highlight supporting conservation efforts for all users.	Lake Havasu City	Cal Sheehy
20478	7	WATDROUGHT - Water Conservation/Drought	Conservation Opportunities and Incentives for All To capture all possible water conservation savings in the Lower Colorado River system, the 2026 Operational Guidelines could include various incentives to water contracts to reduce uses, regardless of entitlement size. Currently, there are many local water conservation projects among financially challenged, small entitlement holders that could help reduce diversions from the river. These water saving volumes are relatively small compared to much larger entitlement proposed projects and are rejected from federal funding opportunities.	Lake Havasu City	Cal Sheehy
20478	9	WATDROUGHT - Water Conservation/Drought	Shortage sharing should not be burdened on one priority group that could lead to its elimination, but spread among all users. All users of the Colorado River contributed in some way to conserve water and improve water use efficiency. In addition, many cooperative efforts among water contract holders over the past several decades have been developed and implemented to accomplish conservation efforts. Increased conservation measures can be implemented throughout the system with federal support focused on conservation methods. Federal support would be helpful to assist system users in infrastructure and technology. A multi-pronged approach is needed that includes municipal users, agricultural users, industrial users, and others.	Lake Havasu City	Cal Sheehy

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20481	3	WATDROUGHT - Water Conservation/Drought	Since adoption of the 2007 Guidelines, the Lower Division States and water users have continued to take action to reduce demands and manage Lake Mead reservoir elevations. By developing partnerships and investing billions of dollars, Lower Division States and waters users conserved and contributed an additional 5.1 million acre-feet of water in Lake Mead through various activities including Intentionally Created Surplus (ICS), system conservation, partnerships with Mexico, and domestic programs. Together these actions have raised the elevation of Lake Mead by 72 feet. The Lower Division States also worked cooperatively with other river partners including the Upper Division States of Colorado, Wyoming, New Mexico and Utah, Reclamation, Mexico, Tribes, and NGOs. Those efforts include the Lower Basin Memorandum of Understanding, the Pilot System Conservation Program, the 500+ plan, projects enabled under Minute 319 and 323 to the Mexican Treaty, and system efficiency projects. The releases from Lake Mead in 2023 are anticipated to be only about 7.7 million acre-feet (maf), the lowest on record, demonstrating the success of the Lower Division States and water user efforts to reduce demands.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	19	WATDROUGHT - Water Conservation/Drought	Additionally, we have had success with voluntary conservation efforts for the benefit of the system, including the historical volumes proposed in the Lower Basin Plan. We must identify programs that can incentivize voluntary conservation and maximize water efficiencies and technologies across all sectors throughout the Basin. To the extent that financial incentives are included, we must identify a durable funding source. Similarly, the Post-2026 EIS should evaluate various voluntary conservation activities and conserved water volumes within the Upper Division States, together with storage of such water in Lake Powell and recovery when appropriate.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20486	10	WATDROUGHT - Water Conservation/Drought	Wyoming supports projects that increase the available water supply through augmentation. While the Post-2026 Operations NEPA process might account for Lower Basin augmentation if appropriate and reasonably certain, Wyoming does not believe that this NEPA process is the proper forum to analyze specific augmentation projects.	State of Wyoming	Brandon Gebhart
20497	4	WATDROUGHT - Water Conservation/Drought	The dispute that ai*ose over a century ago and resulted in a 50-year court battle and Congressional actions has been resolved. The Parties to the Settlement have entered a new phase, working together as implementing partners. Supplemental Water - made possible by Canal Lining Projects that were a major conservation measure to reduce California's use of Colorado River Water- is a critical component of the Settlement's successful implementation. The San Luis Rey Settlement is a good example of local and tribal governments working with the federal government to make water available through infrastructure improvement and conservation measures. Such examples are needed and consistent with the Bureau of Reclamation's efforts to promote multi-party cooperation and conservation measures. Water users need to be able to rely on the benefits of their investment in conserved water infrastructure projects to continue investing in them.	City of Escondido; Vista Irrigation District	Dana White; Jo MacKenzie
20733	1	WATDROUGHT - Water Conservation/Drought	Its time to recognize that farming in a desert is not sustainable		Jake Schoppe
20873	3	WATDROUGHT - Water Conservation/Drought	The EIS should evaluate the distribution and non-essential usage of water in the greater watershed. Communities surrounding the reservoirs of Mead and Powell currently contribute to non-essential water usage such as feeding golf courses and lawns, washing vehicles, showcasing ornamental fountains, and maintaining swimming pools. A clear amount needs to be evaluated, and ideally capped, for such activities so that the river continues to flow for life support.		Kael Van Buskirk
20899	1	WATDROUGHT - Water Conservation/Drought	Water scarcity is the prevailing need and purpose for this Post-2026 EIS in both the Upper and Lower Basins. Water scarcity in the Colorado River Basin (CRB) was the motivation for Lower Basin development in 1928 (Boulder Canyon Project Act) and Upper Basin development in 1956 (Colorado Rivers Storage Project Act), time has shown that building more dams did not solve the water scarcity problem. We note there is growing imbalance between human demands and the natural supply, which is stressed by the acceleration of climate disruptions. There is a real risk of catastrophic collapse and system failure in the CRB in the near-future.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	25	WATDROUGHT - Water Conservation/Drought	8. Outline schedules of Lower Basin and Upper Basin curtailments. 9. Prepare for curtailments caused by climate extremes that may be required to favor senior water rights in the Lower Basin and analyze those potential effects on the environment. See U.S. Supreme Court's 2006 decree in Arizona v California.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20912	4	WATDROUGHT - Water Conservation/Drought	Over the last 20 years, California's urban/rural partnerships in on-farm water conservation, known as the Quantification Settlement Agreement, has become a model of success in creating dependable domestic water supplies while enhancing the efficient production of fruit, vegetable, and forage products that feed America. Because of these efforts, the Imperial Irrigation District now conserves over 500,000 acre-feet of water every year, totaling over 7 million acre-feet since 2003. The water savings represent a 28 percent reduction in IID's annual usage and transfer to urban users within California. The QSA illustrates how on-farm conservation in California's Imperial Valley is already helping to provide dependable water supplies for California cities and we've pledged even more to protect Colorado River reservoirs. Utilizing California's experience, other states need to implement aggressive intra-state conservation partnerships. Urban/rural partnerships which invest in on-farm conservation free up water supplies that should have been developed to meet the increased demands from population growth. Solving the Colorado River's looming shortage with urban-funded on-farm water conservation in the seven Basin States will be smarter, faster and more predictable than a chaotic effort to change priority rights dating back more than 100 years.	Imperial Valley Water (IVH20)	Stephen Benson
20913	1	WATDROUGHT - Water Conservation/Drought	The fate of the entire Colorado River system is in a drastic state of uncertainty. While the circumstances we face as a basin are unprecedented, they are not unpredicted. The scientific and water user community has long acknowledged that the Colorado River is over allocated, and that consumption/demand has outstripped supply for most of the past two decades1. Furthermore, the deleterious effects of climate change have compounded this supply/demand imbalance, with numerous studies expounding the impacts of a warming basin and modeling future scenarios2. Every climate study that has been done on the Colorado River Basin predicts there will be less runoff in the years to come. Leading climate scientists Jonathan Overpeck and Brad Udall have stated that "Half of the flow of the Colorado River may be lost due to climate change by mid-century." Even after the biggest snowpack and runoff in over a decade, which yielded 170% average runoff into Lake Powell, the reservoir stands at a mere 40% full3. The combined storage of Powell and Mead this summer was 36% full or 17.5 million acre feet4--which isn't even enough to fill Lake Mead to 70% full. It's clear that even after a historically wet year, the system's decline is far from averted. Now is the time for actively addressing alternatives that can provide options for water managers while protecting environmental resources. Figure from Colorado River Post-2026 Webinar, BOR 2023 In 2022, the prospect of Lake Powell dropping below minimum power pool within 1-2 years entered the realm of possibility, based on Reclamation's August 24-month study5, even with the extensive efforts to prop up the reservoir in 2021 and 20226. While the tremendous water year of 2023 has boosted water storage at Powell by approximately 4.3 million acre feet7, we must not forget how close we came to reaching that threshold, and how likely it is to happen again given long-term climate models. The Post 2026 Operational Guidelines process provides an opportunity for Reclamation to lead the States forward with options that are based on science-based risk assessments.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20915	1	WATDROUGHT - Water Conservation/Drought	The Colorado River watershed is one of the most important agricultural regions in the United States, providing water for irrigation to over 5 million acres of farmland. Agriculture uses approximately 80% of the Colorado River's water, using it to irrigate 15% of the nation's farmland, and produce 90% of the winter vegetables (feedingourselvesthirsty.ceres.org). As part of the scoping process for the post-2026 Colorado River operations, it is important to consider a "healthy soils approach" to the watershed's future management due to its substantial potential for water conservation and water quality benefits, as well as related co-benefits. A summary of the overall benefits of a "healthy soils approach" (SOM) include: "Increase ecosystem water storage - through enhancing soil structure and increasing soils' effective surface area, SOM increases the amount of water that can be retained in the soil for plant and downstream use, reducing evaporative and runoff issues." "Purify drinking water - the effects of SOM on water holding capacity and soil structure help to enhance soil's resilience to erosion. Soil organic matter also plays a role in reducing the bioavailability of pollutants. These functions contribute to SOM's strong role in purifying water for human uses." "Enhance plant carbon sequestration - by increasing nutrient and water availability, soils with high soil C and organic matter support increased growth of forests, rangelands, and wildlands, leading to increased uptake of atmospheric CO2 ("Soil Carbon" by Erin Berryman, Jeffrey Hattan, et al, Sept. 2020). Studies referenced by the Natural Resources Conservation Service (NRCS - soil health) of the United States Department of Agriculture have found that every 1% increase in soil organic matter can increase the water-holding capacity of soil by 27,000 gallons per acre and help mitigate drought (USDA - helps buffer drought impacts). This can lead to significant water savings, as farmers may be able to irrigate their crops less frequently. Healthy soils are more productive and promote the growth of deep-rooted plants. As a result, farmers may be able to produce the same amount of crops using less water. Studies by the Nature Conservancy found that healthy soil practices, such as cover cropping, no-till farming, and rotational livestock grazing, could conserve up to 30% of water used for irrigation in the Colorado River watershed. This would free up more water for other uses, such as drinking water and environmental flows. Specifically, healthy soils legislation has been approved in the Colorado River Compact states of Utah, Colorado, Arizona, New Mexico, Nevada, and California, as well as 24 other U.S. states. Healthy soils practices are, in fact, already being used to conserve water in the Colorado River watershed. In Colorado, the Natural Resources Conservation Service (NRCS) is working with farmers to adopt cover cropping, no-till farming, and other practices that improve soil health. These practices have helped to conserve millions of gallons of water in the state.		Andy Shrader

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20916	1	WATDROUGHT - Water Conservation/Drought	The solution here is not one of either/or, but one of both/and. We can make choices, now, to allow Glen Canyon to return, and to protect water and ecological resources. We can fix our mistakes and emerge more resilient to a hotter and drier future. There is mounting evidence that the water levels we are seeing are not temporary in nature, but long-term trends. We are experiencing the aridification of the west. Accepting the science and observations can allow us the space to make better decisions.		Travis Custer
20919	22	WATDROUGHT - Water Conservation/Drought	CAWCD recommends that alternatives considered under the Post 2026 EIS incorporate the following four elements: System Efficiency Significant developments have been made in the Colorado River Basin toward developing innovative conservation programs and policies to sustain current and future supplies. With extended drought conditions expected to continue into the foreseeable future, demand management and efficient use of water will play a key role in the Colorado River Basin. To that end, the Post-2026 Operations should also consider promulgating basin-wide efficiency standards and programs for agricultural, and municipal and industrial water users.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20925	2	WATDROUGHT - Water Conservation/Drought	As you are aware, the Water Authority has a history of collaboration with a focus on conservation under its conserved water transfer agreement with the Imperial Irrigation District (IID), which has become a cornerstone of the 2003 Quantification Settlement Agreement (QSA). Another key piece of the QSA is the Water Authority's investment in the lining of the All-American and Coachella Canals (Canal Lining Projects) in the Imperial Valley, which have conserved water once lost to seepage. The QSA has proven critical in ensuring California lives within its 4.4-million-acre-foot apportionment of Colorado River water, which is critical to managing river supplies. Locally, the San Diego region has placed great focus on conservation, reducing per capita water use by more than 40 percent since 1991. The Water Authority and its member agencies have invested heavily in local projects and infrastructure to generate and store water, such as the Claude "Bud" Lewis Carlsbad Desalination Plant (desalination plant) and our $3.1 billion Emergency Storage and Carryover Project. The Water Authority's strategic investments in water resiliency, along with the efforts of our member agencies to develop local supplies, are easing pressure on the river and the California State Water Project. Today, under the current challenges created by this ongoing drought, the Water Authority has called upon the San Diego region to do even more to conserve water in support of the river. Conservation will continue to be critical going forward for the river's long-term management.	San Diego County Water Authority	Dan Denham
20925	8	WATDROUGHT - Water Conservation/Drought	The importance of the QSA needs to be considered in the analysis of future river operations. The QSA serves as a model for the entire Basin through a collaborative approach to conservation and water management. Through the conserved water transfer agreement, the Water Authority has funded conservation implemented by IID in a mutually beneficial program that has provided conserved water supplies to the San Diego County region while protecting agriculture and the environment. In total, the Water Authority's QSA supplies include 200,000 acre-feet annually of conserved transfer water and 77,700 acre-feet annually of water conserved through the Canal Lining Projects, which the Water Authority funded along with help from the state. Along with serving as a model for collaboration and conservation, and helping to manage California's river usage, these conserved QSA supplies facilitated, in large part, the Interim Guidelines. Specifically, by quantifying water rights within California through capping annual entitlements, the QSA allowed for the development of future conservation, forbearance, and storage programs.	San Diego County Water Authority	Dan Denham
20926	1	WATDROUGHT - Water Conservation/Drought	Our population is very divided and a significant portion of that population does not accept the fact of climate change. Without the will of the people to adapt/compromise in order to slow down global warming, the impacts will only become more dramatic. To encourage conservation, there needs to be both incentives and penalties for individuals, cities, counties, farmers, ranchers and businesses to conserve. It has to be quantified and verified.		Mary Ann Garner
20926	4	WATDROUGHT - Water Conservation/Drought	There are ways to improve agricultural practices to use water more efficiently. Farmers need further encouragement to change crops and/or invest in more efficient irrigation systems etc.		Mary Ann Garner
20940	4	WATDROUGHT - Water Conservation/Drought	Finally, conservation efforts by the upper basin state, such as the Conserved Consumptive Pilot Program and Demand Management must be administered and stored in Lake Powell as a separate bucket of water. I am not in support of using bureau of reclamation funds from the Infrastructure and Inflation Reduction Acts to pay the lower basin to abide by the CRC language. Those funds would be much better spent collecting data for forecasting water supply and improving water storage and delivery infrastructure. Such payments fly in the face of the concept 'Live Within Our Means!'		Ken Brenner
20942	3	WATDROUGHT - Water Conservation/Drought	It has become apparent that the existing 2007 interim guidelines have had the effect of driving Lake Powell water levels to dangerous lows while the lower basin has continued to engage in brinksmanship with balancing tiers and habitual overuse of its long-term Colorado River Compact entitlements. DWCD is concerned that Reclamation operations of Lake Powell and Lake Mead not continue to contribute to the challenges of drought by artificially driving Lake Powell to dangerously low levels, potentially fueling curtailment of Upper Basin water users including the District.	Dolores Water Conservancy District	Ken Curtis

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20946	7	WATDROUGHT - Water Conservation/Drought	Any post-2026 strategies should also recognize Colorado River users' water efficiency and any modifications to allocations should reward, rather than penalize, efficiency. Doing otherwise, and penalizing users for having made substantial prior investments in water efficiency, would disincentivize conservation and lead to further strain on the river's limited supply.	Yuma County Water Users' Association	James Auza
20946	8	WATDROUGHT - Water Conservation/Drought	Yuma's Colorado River water usage is currently at a 50-year low, and Yuma farmers have made significant investments in improving their efficiency of water use. Yuma farmers have improved their efficiency through a combination of multi-crop production systems, improvements to on-farm infrastructure, and district-wide modifications. In contrast to may other agricultural users of Colorado River water. Yuma rotates its crops twice per year, which enables it to use substantially less water in July through September. In the fall and winter, Yuma farmers grow vegetables such as lettuce, spinach, kale, and cabbage; then, in the spring and summer, they switch out the winter vegetables for other crops, such as melons, wheat, and sudan grass. Because the spring/summer crop matures in the late spring or early summer, irrigation is not needed during the latter half of the summer, when high temperatures cause high evaporative demand. Yuma's farmers have also invested substantially in on-farm infrastructure to obtain improvements in efficiency, including adopting alternative water delivery systems, such as sprinkler and drip irrigation. They have also shortened their irrigation runsto increase efficiency and modified conveyance systems and turnouts to allow for high-volume water deliveries, which lower the opportunity time for water to infiltrate below the root zone. Yuma's farms also utilize furrow geometry-Le., the furrows are pressed into a right trapezoidal configuration using a press wheel, which reduces friction and enables rapid movement of the water. Finally, Yuma's fields benefit from widespread adoption of clean cultivation as well as precision field leveling lasers, which together result in improved water distribution and increased water conservation. As technology improves and/or funding becomes available, Yuma farmers will continue to take measures to improve efficient water use. The post-2026 EIS should recommend the allocation 4 of federal and state monies throughout the basin to line or pipe irrigation canals, foster innovation in water delivery systems,	Yuma County Water Users' Association	James Auza
20946	10	WATDROUGHT - Water Conservation/Drought	Yuma is not alone in its efforts to maximize efficiencies. And, given the federal government's recent funding of infrastructure projects throughout the Colorado River Basin, we anticipate additional efficiencies will be gained by numerous users. When considering any adjustments to allocations as part of its analysis or post-2026 operations, Reclamation should not penalize users like the Association and other Yuma farmers who are maximizing water efficiency and making extraordinary efforts to conserve this scarce resource.	Yuma County Water Users' Association	James Auza
20950	5	WATDROUGHT - Water Conservation/Drought	It's clear that we need to rethink how we manage the Colorado River in order for it to continue to provide for the 40 million people who depend on it. Hotter and drier conditions are the new normal in the Colorado River Basin. A wet winter, along with short-term agreements to reduce water use, have kept the river from the brink of collapse. But we cannot continue to do only enough to bridge from one crisis to the next. The effects of drought and increasing temperatures due to climate change over the past two decades continue to impact river flows, affect storage supplies and impose additional uncertainty for communities of the Colorado River Basin. This means there is even greater urgency to develop and implement solutions as soon as possible.	Gadsden Company, Sonoran Wines, Cruz Farm, Greater Area Kingman Chamber of Commerce, Bullhead City Chamber of Commerce; Greater Flagstaff Area Chamber of Commerce	Harold Thomas
20952	14	WATDROUGHT - Water Conservation/Drought	The EPA notes that there are a number of current and planned efficiency projects in the Lower Basin and recommends that the new guidelines incorporate these activities and projects that fulfill Reclamation's commitments or otherwise assist in drought response actions. As part of demand management, the EPA recommends identifying and analyzing the effectiveness of conservation measures in both the Upper and Lower Basin states as commitments to increase efficiencies or otherwise reduce demand (e.g., covering canals with solar panels), even if such measures are beyond Reclamation's control, already underway, or still in development (e.g., Reclamation's initial funding of Colorado River Basin projects9).	Environmental Protection Agency Region IX	Robin Truitt
20952	15	WATDROUGHT - Water Conservation/Drought	Highlight conservation as a tool to reduce demand as a stated need, as well as a purpose of the project to ensure that conservation is incorporated into all action alternatives. Consider more advanced or aggressive levels of conservation or reallocations (e.g., those associated with smart growth principles or prioritizing municipal uses) within the alternatives analysis.	Environmental Protection Agency Region IX	Robin Truitt
20955	6	WATDROUGHT - Water Conservation/Drought	Gilbert holds multiple subcontracts and leases for Colorado River water delivery through the Central Arizona Project (CAP) system. The Colorado River is a critical water supply for the community, making up approximately 50% of our annual water deliveries. The historically low reservoir conditions on the Colorado River have caused a large degree of uncertainty that is unacceptable to Gilbert given that our existing residents and businesses rely on the Colorado River supply. We work hard to provide reliability to our customers and the uncertainty regarding the future of Colorado River supply availability makes it difficult to plan for and invest in the necessary infrastructure, alternative supplies, and conservation programs to overcome reductions. These efforts require a great deal of financing, time, and in many instances, Town Council approval. Our infrastructure and community cannot turn on a dime to adjust to drastic shortages and we need advanced notice to make the necessary adjustments to system operations and water usage. To ensure our long-term ability to provide water to residents and businesses, and sustain our economy, we need increased clarity and reliability with regards to the future of our Colorado River supplies. The Post-2026 operations are critical to that outcome.	Gilbert Arizona Public Works	Lauren Hixson

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20963	19	WATDROUGHT - Water Conservation/Drought	Allow for greater flexibility: A key element of the next Colorado River management framework must also be flexibility--the framework must be able to quickly adjust to and account for changing hydrological conditions without requiring complete system overhaul in parts of, or throughout, the Basin. For the framework to provide flexible water management strategies that contribute to Basin-wide water security for all water users, including the environment, it must be based on a range of modeling scenarios. Flexibility requires real time data and information. The present management of the Colorado River system is based on 24-month studies and restricted shifting from historical protocols. That worked fine when there was excess water in the system. With the structural water deficit that now exists in the Basin and shifting demands, a real-time approach that allows for daily and hourly fine tuning of water deliveries and reservoir management is required.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20968	1	WATDROUGHT - Water Conservation/Drought	The Rio Blanco Water Conservancy District (RBWCD) is pleased to provide comments to the Bureau of Reclamation for the Post - 2026 Operational Guidelines and Strategies for Lake Power and Lake Mead. The RBWCD is a statutorily created special district of the state for the purposes of developing land and water resources for the benefit of the district constituents within the White River Basin in Colorado. The district has considerable concerns with the overuse of water within the Lower Basin states not matching the hydrology, supplementing supply from storage exceeding the ability of storage within Powell and Mead to recover, and exceeding want is agreed upon with the Colorado River Compact 1922. This dependency on overuse has increased risks of water shortages and damage to the upper basins include the RBWCD. The RWBCD being in the White River basin is dependent upon natural flows from precipitation and agricultural return flows since the White River Basin in Rio Blanco County Colorado has limited to no reservoir storage. While the RBWCD continues to advance solutions to meet a portion of our water needs, recent hydrology with the extended drought has exacerbated shortages in our basin where current water shortages have become even more detrimental. Operating with a water deficit has become the norm.	Rio Blanco Water Conservancy District	Alden Vanden Brink
20968	4	WATDROUGHT - Water Conservation/Drought	With that said, we must also reiterate that along with our RBWCD, Basin's, State's, and the Upper Basin's efforts, there must be focused, concerted conservation in the Lower Basin, resulting in realistic and sustainable usage within the limits of its intended Compact appropriation, including evaporation, and accounting for reduced hydrology. Beyond 2026, operating principles implemented for the Colorado River System must be sustainable, fair, and equitable. And the addition of new storage in the upper basin for the greatest benefit of all Colorado River basin water users.	Rio Blanco Water Conservancy District	Alden Vanden Brink
20973	12	WATDROUGHT - Water Conservation/Drought	Updated accounting of all impacts associated with the various ways water will be conserved through the lifetime of the interim guidelines. This should include voluntary water conservation agreements from basin states as well as any other water conservation actions and associated reduced river flows (i.e., Minute 323; Intentionally Created Storage).	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	13	WATDROUGHT - Water Conservation/Drought	Evaluation of the effectiveness, efficacy and long-term benefit of various conservation measures put in place associated with the 2007 Interim Guidelines or other related consultations. Some conservation measures may not be meeting conservation goals and should be re-evaluated to determine if they can be improved or if those measures should be discontinued or replaced with different options.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20979	1	WATDROUGHT - Water Conservation/Drought	We understand that modified operating criteria are necessary to address the potential catastrophic loss of water supply in the Colorado River Basin and damage to critical infrastructure. The health and safety of the millions who rely upon water delivered through the CAP canal are at risk if new operating criteria and supply reductions are not equitably applied across the Lower Basin States. Arizona water users have accepted significant supply reductions for multiple years, over and above agreed upon shortage reductions, to attempt to stabilize Lake Mead. But these reductions have not been enough. It is beyond the ability of the state of Arizona, even if it were to forego its entire 2.8 million acre-feet apportionment, to produce the volume of conservation savings that may be needed to stabilize Lake Mead. We have experienced almost two decades of extremely dry conditions in the Colorado River Basin due to the impacts of aridification. New, comprehensive measures are needed to address the problem and all Colorado River water users must participate in these measures.	Arizona Water Company; City of Buckeye; City of Surprise; EPCOR Inc. (EPCOR Water); Town of Marana; Town of Queen Creek; Water Utility of Greater Tonopah (Global Water Resources); City of Casa Grande; City of Maricopa; Pinal County; Town of Superior	Melinda Whittington; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Not Provided; Todd Pryor
20982	8	WATDROUGHT - Water Conservation/Drought	Most importantly, as the Colorado River Basin continues to be subject to the effects of climate change and provides much less certainty in local water supplies, solutions must be locally driven. We recognize that with the diminishing water availability in the West due to drought, aridification, and growing populations, there is an ongoing need to conserve water while maintaining the economic viability of our communities. The only way to be successful in this endeavor is to work at the local level where solutions can be tailored to local needs. We urge Reclamation to continue working to secure federal funding to be utilized by local entities for these local projects as part of a parallel, but distinct, process from other basin-wide efforts.	Southwestern Water Conservation District	Steve Wolff

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20985	6	WATDROUGHT - Water Conservation/Drought	THE BUREAU SHOULD PRIORITIZE VOLUNTARY, COMPENSATED CONSERVATION. Mandatory, involuntary reductions in water use will be painful and devastating for most users and communities that rely on Colorado River water. The District and its growers and landowners are among those that would suffer significant impacts from uncompensated, mandatory cuts. In the last several years, impacts from such reductions have been lessened across the Basin with the development of voluntary, compensated conservation programs. These types of voluntary, compensated conservation programs and others should be prioritized and fully analyzed in the post-2026 process. Existing programs show that compensated conservation is practical and effective and such programs are fundamentally fair and equitable. The District understands that this may require additional and ongoing federal funding - Bard Water District stands ready to support the Bureau in this effort.	Bard Water District	meghan noblelaw.com; Ray Face
20986	2	WATDROUGHT - Water Conservation/Drought	In considering potential future operations in the Colorado River Basin, New Mexico recommends applying lessons learned from the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and the Coordinated Operations for Lake Powell and Lake Mead ("2007 Guidelines"). The 2007 Guidelines have been in place since December 2007 and currently 1 govern management of the two reservoirs, along with the 2019 Drought Contingency Plans ("DCPs"). The 2007 Guidelines have proven insufficient to adequately manage Lake Powell and Lake Mead, particularly in drier hydrology. This insufficiency required negotiating and implementing several other actions during the lifetime of the 2007 Guidelines. This included the DCPs and, in 2022, the Supplemental Environmental Impact Statement to the 2007 Guidelines. Over the life of the 2007 Guidelines, releases of water from Lake Powell have, at times, outpaced the inflows into the reservoir that we have experienced in the 21st century. Historically, the abrupt jumps in Lake Powell releases at tier interfaces have been problematic because forecast errors and small changes in hydrology have been sufficient to shift from one tier to another. This has sometimes led to a perverse outcome in which slightly better hydrology resulted in a release of large amounts water from Powell storage compared to what would have been released under slightly different hydrology. In some instances, operations at Lake Mead have negatively impacted Lake Powell elevations. Lessons learned from the 2007 Guidelines can help avoid the mistakes of the past and provide helpful insight on how to proceed differently in the future. The 1922 Compact was signed to protect the interests of all seven states in the Colorado River Basin. New Mexico understands that the Lower Basin wants to protect the robust economy made possible because it has had a secure and dependable water supply. However, that must not be accomplished at the expense of the Upper Basin not being able to more fully develop its economy.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20993	9	WATDROUGHT - Water Conservation/Drought	there must be focused, concerted conservation in the Lower Basin,	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21001	7	WATDROUGHT - Water Conservation/Drought	The effects of drought and increasing temperatures due to climate change over the past two decades continue to impact river flows, affect storage supplies, and impose additional uncertainty for businesses and companies that operate in and rely on water from the Colorado River Basin.	Bonneville Environmental Foundation	Todd Reeve
21081	5	WATDROUGHT - Water Conservation/Drought	It has been argued that the Colorado River was over-allocated as early as the 20th century (Fleck and Castle, 2022.) Since the mega-drought started in 2000, the system has been clearly over-drawn and not sustainable. To this end, it is critical that the BoR considers permanent cuts to water use, particularly in the Lower Basin states.	Dolores River Boating Advocates	Rica Fulton
21081	10	WATDROUGHT - Water Conservation/Drought	BOR and Wheeler et al (2022) have both found that additional Upper Basin development would add continued pressure to the Colorado River System. No additional development should be allowed, unless water savings are made up for elsewhere in the same watershed. In other words, consider the current level of stored water in each state and watershed the maximum allowable amount, and if alternative storage is found to be a better use of water, than previously stored water would be sent downstream.	Dolores River Boating Advocates	Rica Fulton
21094	12	WATDROUGHT - Water Conservation/Drought	2. Fund new opportunities for tribes to participate in water conservation programs.	Southern Ute Indian Tribe	Melvin Baker
21115	1	WATDROUGHT - Water Conservation/Drought	Our member agencies in the Basin have been leaders in reducing water consumption, and their efforts illustrate both a willingness to address necessary conservation measures and the enactment of leading practices to do so. Many AMWA members, along with other Basin agencies, acted in November 2022 to develop a Memorandum of Understanding to reduce demands on the Colorado River1 and again in May 20232 to agree to a consensus-based system of conservation.	Association of Metropolitan Water Agencies	Thomas Dobbins
21124	9	WATDROUGHT - Water Conservation/Drought	Climate change science indicates that future hydrological outcomes are more and more difficult to predict. Furthermore, current models show that the 12.6 maf/yr flowing through the System is not the result of a drought but rather the norm going forward. For this reason, we highly suggest shifting language in the Post-2026 Guidelines from using the word "drought" to using the word "aridification", which better reflects the current hydrological reality. Rather than treating the low annual System flows as an anomaly that will end in the future, it should be understood as a continuing (and potentially worsening) consequence of climate change. Consequently, the Post-2026 Guidelines must include flexibility and specific procedures to deal with even more severe challenges if the policies to reduce use and losses prove insufficient.	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck

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21150	2	WATDROUGHT - Water Conservation/Drought	The EIS should analyze the amount of reduced water use that could be achieved by agriculture transitioning to methods of irrigation that use less water such as drip irrigation, night watering, and growing water-intensive crops that arenÂ't destined for foreign markets. As agriculture is by far the largest user of Colorado River water, the greatest reductions in water use can be found there.		Cole Paffett
21150	3	WATDROUGHT - Water Conservation/Drought	Additionally, the EIS should include analysis of water savings that could be achieved through closing golf courses or transitioning golf courses to links-style (where the only irrigated areas are the tee box, fairway, and green) so water isnÂ't wasted irrigating areas of the course that arenÂ't in play. *		Cole Paffett
21158	2	WATDROUGHT - Water Conservation/Drought	-Get rid of the "use or lose it" policy for farmers in California. There is no legitimate reason why 80% of all water in the CRB goes to unsustainable agriculture practices in California, while the Navajo Nation is denied water that flows through their land. - Encourage farmers to use more sustainable agriculture practices including but not limited to - no tilling - no pesticides or insecticides - no more monoculture practices. -Use cover crops All of these practices have scientifically been shown to be unsustainable. Any farmer or corporation that refuses to switch to more sustainable practices should be charged 5 times the normal rate per gallon. Grasses - Any allocation of water to grasses grown in the desert should be abolished regardless of money offered. Including but not limited to: -gulf courses - office spaces - Individual homeowner's lawns. 95% of all grasses grown in North America are not native plants to North America. Encourage more ecosystem restoration projects.		Kyle Aldridge
21160	1	WATDROUGHT - Water Conservation/Drought	Help farmers convert to non flood irrigation. Close up golf courses in the impacted areas. Get big oil to pay for climate related relocations and infrastructure needs.		Jennifer High
21162	1	WATDROUGHT - Water Conservation/Drought	- Encourage Farmers to use cover crops which help retain moisture and reduce the temperature of the ground. -Encourage Farmers and agricultural companies to abandon the practice of Glyphosphates. (Pestcides and insecticides). By tripiling the price of water to the companies and farms that refuse to do so, citing the building and maintenance of filtration systems necessary to make sure those contaminated waters up and down the CRB don't destroy other eco systems. *Abolish water usage for non-native grass. 95% of all grass we grow in North America isn't Native plant life to North America. If we want a fighting chance against climate change, we need to restore Native plant life and eco systems. * Incentivise eco system restoration projects with the necessary amount of water to do so. -including but not limited to community composting projects. - Mass agricultural greenhouse projects that could help us grow more food with less water.		Kyle Aldridge
21164	1	WATDROUGHT - Water Conservation/Drought	I think whatever happens we need to be incentivizing the biggest users of water to reduce their water usage. It's absolutely insane and archaic that we have a system in place that currently rewards entities for using more water when they don't have to due to the asinine use it or lose policies that were put into place 100 years ago.		Mike Schinis
21164	3	WATDROUGHT - Water Conservation/Drought	We should be working on simple ways to reduce evaporation like placing solar panels over canals, only allowing watering at certain times of day, etc.		Mike Schinis
21165	1	WATDROUGHT - Water Conservation/Drought	lease examine and address the impacts climate change has on water supply.		Jessica Stone
21278	3	WATDROUGHT - Water Conservation/Drought	It is absurd to grow cotton and alfalfa in the desert, not to mention shipping those crops overseas. Stop those water allocations. The cities of the Southwest need to realize the limits to growth, especially water scarcity, and either stop growing or find other sustainable sources of water.		Bob Dorsett
21288	1	WATDROUGHT - Water Conservation/Drought	Achieving this objective will require more conservative reservoir operations and more proactive shortage sharing arrangements amongst all users. The new guidelines must focus on not only slowing the declines of Lake Mead and Lake Powell, but also building the reservoirs back up. Reclamation should continue to pursue implementation of assessments on evaporation, seepage and system losses. While this may lead to greater reductions, we believe in the long run this will help stabilize the systems and provide increased reliability for all users in the Basin.	City of Goodyear	Barbara Chappell
21301	9	WATDROUGHT - Water Conservation/Drought	Whether included as a part of a definition of Beneficial Use or otherwise imposed, opportunities for conservation across all sectors- without regard to priority- should be evaluated in this EIS process. Incentivized temporary conservation has played a significant role in the current shortage crisis by averting more draconian reductions in delivery. The role of temporary incentivized conservation moving forward will depend upon funding made available, in particular by the federal government. More sustainable savings from increased efficiencies should be emphasized over repeated temporary conservation measures.	Mohave County Water Authority	Jamie Kelley

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9	1	WATERRIGHT - Water Rights and Agreements	Everything I've read over the past couple of years California has truly not committed to any of this. When 6 of the States in the Basin got together for cuts over the past 2 years, California definitely made the grandstanding, in my opinion position, that they were not going to participate, nor comply with anything that was going on with everything that I had kind of read my question, I guess, posing it out there to the ether would be until all the States are either on board or forced to be on board pretty much as of this a moot point. They keep stating that they're going to push their grandfather water rights as priority and take what they need want desire and it seems to me that most people realize that water is not something that just shows up. There is no infinite supply of and until everyone's playing on the same page with the correct numbers, with the correct volume of water that's following with the correct breakdowns of everything that truly this is just a can that keeps getting kicked down the road.		Brett Simpson
30	4	WATERRIGHT - Water Rights and Agreements	California has a senior right, but to the best of my knowledge, does not have the sole senior right (which they want us to think) to the exclusion of the other Lower Basin states.		
651	3	WATERRIGHT - Water Rights and Agreements	California does not want to let go of their "senior" water rights from the original 1922 Colorado River Compact, but they are going to have to do so.		Steve Davis
655	9	WATERRIGHT - Water Rights and Agreements	No, or different, "senior water rights" A just rule would admit that Native Americans (including those in Mexico) have 100% of the senior water rights in the U.S. This based on many wrongs that need righting: 1) Colonizers, U.S. Federal, and State governments committed genocide while forcing natives to move. The genocide included biologic warfare (not often intentional) that killed 9 of 10 natives. Read Guns, Germs, and Steel (Jared Diamond) and others. 2) The 1862 Morrill Act "gave" unceded Native land, and mineral rights, to Union states. This theft of land was used to fund land grant colleges (such as the University of California). The theft included subsurface water and may have included surface water. 3) A 22 June 2023 Supreme Court decision denied a Navaho request for the U.S. Federal government to identify the water rights it holds for them. Even without the injustices, the late 1800's and early 1900's concept of "senior water rights" could be considered as mechanism to drive investment in water and water-using infrastructure in Western States. That is, the investors were assured of recovering their investment. Large investments, such as dams and canals, might be justified with a 50-year economic life. The investors have been overcompensated with over 100 years of investment recovery. [...] Mexico, ideally the Native Americans in the Colorado River Delta, should have the most senior rights. The amount could be the 1944 agreement's 1.5 million AFY or some faction of the total. States could receive a fraction of the total natural flow proportional to their land that is irrigated with Colorado River water. Native Americans would receive a fraction of the total natural flow proportional to their land and population that could be irrigated with and/or receive Colorado River water. The Native Americans select the total amount of water that can be withdrawn from the river each year as follows (fictious numbers for example): If the Native Americans decide to withdraw 2 million acre-feet from the Colorado River in 2035, the total withdrawal (perhaps excluding the flow to Mexico) in 2035 becomes 10 million acre-feet. Should Native Americans plan to use only 0.5 million AFY in 2037, then the total withdrawal (excluding Mexico) becomes 2.5 million AFY. Phase-in over a decade so that Native American's current lack of irrigated land does not constrain the total that can be withdrawn. (Yes. Making the total withdrawal proportional to Native American use leaves non-natives encouraging natives to use more water!)	Oceanforesters	Mark Capron; Mohammed Hasan
2824	13	WATERRIGHT - Water Rights and Agreements	Failure by you and the Secretary to adopt the protections we propose for tribal water rights, or a comparably effective set of protections, would subordinate the senior legal priority of tribal water rights under the Winters doctrine to legally junior non-Indian uses. This would recapitulate the sorry and discredited failure of the United States to assert and protect tribal reserved rights in the 1920s and subsequent decades following Winters, and would result in a comparable subversion of tribal rights. You and the Secretary should not allow the United States in the 2020s to repeat the appalling derelictions of its trust responsibility that occurred a century ago. Accordingly, the Hualapai Tribe strongly urges the Department to require any final plan on Colorado River operations after 2026 to provide protection and security to the CAP water allocations that Arizona tribes have received in congressionally approved water rights settlements, such as the protections we have proposed in these comments.	Hualapai Indian Tribe	Hannah Waldrop
12813	2	WATERRIGHT - Water Rights and Agreements	Either drop the concept of "senior water rights" or reassess who really has the most senior water rights. Either way, this is essential for adjusting the total amount of water that can be extracted from the Colorado River each year.	Oceanforesters	Mark Capron; Mohammed Hasan
16821	2	WATERRIGHT - Water Rights and Agreements	1. Acknowledge the possibility of Tribes within the basin utilizing the entirety of the water rights they are entitled to, regardless of current population or development on tribally owned land. Any plan moving forward needs to guarantee the ability for all federally recognized tribes within the basin to settle with the states for their water rights and to build the infrastructure in place to access them.		Teal Lehto

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20310	5	WATERRIGHT - Water Rights and Agreements	ICFB believes the Imperial Irriga,on District has no obliga,on for further reduc,on in its water alloca,on and we oppose any modifica,on of our water rights. Therefore, it is our opinion that future Colorado River reservoir opera,ng guidelines must follow and respect the priority system. Several months ago, the Bureau proposed a Supplemental Impact Statement (SEIS) for near-term Colorado River Opera,ons. ICFB took issue with several alterna,ves proposed. Ac,on Alterna,ve 2 u,lized the terms "pro rata," "fair and equitable" which are not terms used in legal interpreta,on of Colorado River water rights. We discourage the Bureau from evalua,ng future opera,ng guidelines which resemble Ac,on Alterna,ve 2 which disregard the priority system, a tested principle of water law. As landowners in the Imperial Valley, we view any ac,on that infringes upon our Present Perfected Rights (PPR) as an uncons,tu,onal "taking." We also object to the use of the term "Concept of Priority" in the Bureau of Reclama,on's four public webinars associated with the SEIS for near-term Colorado River Opera,ons. How can you refer to an act of Congress which has been adjudicated at all levels of the U.S. court system simply as a concept? During the Bureau webinars, tribal water rights were referred to as a maVer of seVled law. Imperial Valley landowners have the same water rights standing as Na,ve American Tribes with pre-1922 water rights. Why then relegate PPRs, with the same interpreta,on of water law, simply as a "concept of priority?" This illustrates a deliberate aVempt to diminish the Law of the River as it pertains to the priority system. We request the Bureau maintain the integrity of Law of the River in developing post- 2026 Colorado River opera,ng guidelines.	Imperial County Farm Bureau	Rachel Magos
20341	1	WATERRIGHT - Water Rights and Agreements	(1) comply with the Law of the River;	Imperial Irrigation District	Shields, Tina L
20341	5	WATERRIGHT - Water Rights and Agreements	The Law of the River is a collection of compacts, treaties, statutes, U.S. Supreme Court Decisions and Decrees, and other authorities and binding contracts that govern Colorado River allocations and apportionments. Under the Law of the River, IID has a senior entitlement to Colorado River water pursuant to a permanent 1932 contract with the Secretary of the Interior ("Secretary"). Reclamation needs to account for the Law of the River and priority system to avoid analyses, conclusions, or proposed alternatives that would be illegal or infeasible and that would accordingly fail to comply with NEPA's requirements. Reclamation's analysis should therefore be based on the priority system under the Law of the River, which is based on Lower Basin water rights and factors such as priority dates (particularly present perfected rights), the 1928 Boulder Canyon Project Act, the 1964 Arizona v. California Supreme Court decree, and the 1968 Colorado River Basin Project Act (43 U.S.C.A. SS 1521(b)), which provided for the subordination of Central Arizona Project water users to California's 4.4 million acre-feet apportionment in times of shortage.	Imperial Irrigation District	Shields, Tina L
20341	12	WATERRIGHT - Water Rights and Agreements	Reclamation should set aside political or societal influencing factors, including more recent calls for human health and safety water and deliveries of Intentionally Created Surplus storage water to be delivered outside of, or inconsistent with, fundamental legal requirements, particularly when those water demands can be met through existing or new partnership agreements or by alternative (non-Colorado River) water sources.	Imperial Irrigation District	Shields, Tina L
20341	25	WATERRIGHT - Water Rights and Agreements	IID believes that the balancing of overall demands on the system with available supply, consistent with the Law of the River, is the foundation for the long-term sustainable management of the Colorado River system upon expiration of the 2007 Interim Guidelines. IID intends for these recommendations to ensure that the EIS incorporates the legal parameters governing the Colorado River and inform the Colorado River's stewardship in a changing climate, while providing for the operational certainty, planning and investment necessary by all water users in the Basin to adapt to the hydrologic conditions that are anticipated to occur beyond 2026.	Imperial Irrigation District	Shields, Tina L
20355	2	WATERRIGHT - Water Rights and Agreements	Tribal Water Rights Provision must be made in this and future deliberations on Colorado River operations for the full and timely engagement of Tribal representatives and respect for Tribal water rights. In its role as Trustee, the Department of the Interior should ensure that Tribes receive support for independent analysis of the impact that any proposed modifications or alternatives will have on their individual water rights and interests, both immediately and in the longer term. This will require frequent and meaningful consultation with individual tribes whose interests are likely to be affected as alternatives are developed. And in all scenarios, executed Tribal water rights settlements must be fully honored, and resolution of pending claims not foreclosed.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold

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20431	1	WATERRIGHT - Water Rights and Agreements	Build on the Law of the River to address current and future conditions SRP believes the only viable path forward is to follow the intent of the 1922 Colorado River Compact ("Compact") and build on the Law of the River to "provide for the equitable division and apportionment of the waters of the Colorado River System."2 The "Law of the River" is the robust system of Federal and State statutes, compacts, contracts, court decisions and decrees, treaties, and administrative decisions which govern Colorado River allocations and operations. The Colorado River Basin States ("Basin States"), like much of the West, allocate water based on the doctrine of prior appropriation: the earliest uses receive the highest-priority rights. While the priority system is a valuable vestige of the early days on the Colorado River, because of the unique circumstances of the Colorado River basin, it was recognized early on that a strict application of priority on an interstate stream, whose drainage spans vastly different socioeconomic circumstances, would cause "present and future controversy," and inhibit the "expeditious development of the Basin."3 As a result, the Basin States agreed to an equitable apportionment between the Upper and Lower Basins in the Compact, and left to each sub-Basin how to equitably distribute those volumes among the States. In the early 1900s when the Basin States adopted the Compact, the average annual water supply in the Colorado River system was believed to be well over 16 million acre-feet ("maf") per year. Compact apportionments to the Upper and Lower Basins presumed there would likely be excess water to eventually afford to Mexico, and perhaps more thereafter. Hydrologic conditions since have demonstrated a shortfall in that assumed supply, ranging from a long-term average of 14.9 maf/year running up to development of the 2007 Guidelines, to an average of 12.5 maf/year since the year 2000.4 This shortfall has had, and will continue to have, long-lasting implications for users across the Colorado River Basin who must consistently negotiate and renegotiate agreements to live within the means of the river. The challenges of operating with the current hydrologic shortfall as compared to the Compact's foundational assumptions have led some to suggest the entire Law of the River be thrown out and redrafted, or key decisions be revisited. SRP does not support wholesale revision to the foundational legal framework. Reclamation should focus on new operational guidelines that consider the entire Colorado River system and foster cooperation among the Basin States, and "avoid unnecessary, protracted, or destabilizing litigation,"5 as it did in developing the 2007 Guidelines.	Salt River Project	Leslie Meyers
20471	7	WATERRIGHT - Water Rights and Agreements	II. The Bureau's proposed post-2026 plans, and the supporting environmental analysis, must follow the Law of the River. The communities along the Colorado River rely on the Bureau for its leadership, policymaking experience, technical expertise, and commitment to the Nation. We also rely on the Bureau to follow federal law and the water delivery contracts already signed by the United States. This "Law of the River" encodes the priority system, which the Bureau lacks authority to alter within the current process. Reconsideration of the priority system is necessarily outside of the scope of the post-2026 process absent intervention from Congress or the Supreme Court. The alternatives the Bureau develops for consideration in the post-2026 process must all comply with the priority system. And proper application of the priority system--to determine how water deliveries may change in the future--is vital to correctly evaluating the impacts of those alternatives for post-2026 operations.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	8	WATERRIGHT - Water Rights and Agreements	A. The priority system for apportioning Colorado River water in the Lower Basin works as follows: The Bureau, on behalf of the Secretary of the Interior, first satisfies present perfected rights ("PPR") without regard to state lines. Arizona v. California, 376 U.S. 340, 342 (1964); 43 U.S.C. SS 1521; Arizona v. California, 547 U.S. 150, 155 (2006). The Bureau then satisfies non-PPR users with contract dates prior to 1968 ("middle-priority users") before satisfying post-1968 users, as stated in the Colorado River Basin Project Act ("CRBPA"). 43 U.S.C. SS 1521(b). The CRBPA makes clear that the Bureau has a mandatory duty to satisfy the Districts' entitlements--which date prior to 1968--before it can deliver water to any users with post-1968 contract dates. All parties have long recognized that water is allocated in this way. See, e.g., Director's Shortage Sharing Workgroup Recommendation, October 24, 2006 at 2 (prepared by Arizona Department of Water Resources workgroup and recognizing that users at Arizona Priority 4 and lower are reduced before reducing users at Arizona Priority 3). This priority system is not an accident. Rather, it is a foundational political compromise that reflects a long-term bargain: Higher priority users such as the Districts receive a relatively steady supply of water, but in years of abundant water cannot receive more than their contractual entitlement. Arizona junior-priority users--Arizona Priority 4 and lower--receive a variable supply of water (potentially nothing in years of low flows) but enjoy the excess of Arizona's allocation in years of higher flows. Involuntary cuts out of order force higher priority users to bear the burden of reduced deliveries in bad years, while they receive none of the benefits in good years. Users have acted in line with that bargain, and so enormous reliance interests are at stake, for which the Bureau's analysis must account. Under this bargain, for example, Arizona Priority 4 users have stored large amounts of excess water underground, in federal reservoirs using the Intentionally Created Surplus ("ICS") system, and elsewhere--water that higher-priority users such as the Districts did not use. That conservation by Arizona Priority 4 users is responsible water use that the Districts support. And under that bargain, users in the Districts have invested--and continue to invest every year--in efficiency at considerable cost, knowing that operating within their contractual entitlements and maximizing yields in a drier ecosystem contribute to the long-term viability of the River system. Indeed, due to the extraordinary efforts of their users, the Districts under-run their entitlements year after year.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane

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20471	9	WATERRIGHT - Water Rights and Agreements	B. Several points important to the scope of the Bureau's analysis flow from that law, history, and practice. First, all parties concerned have clearly relied upon the law as it has stood for decades. By following that law, the Bureau will not only fulfill its APA SS 706(1) obligations, but also respect those multi-billion-dollar reliance interests that underpin our Nation's food system. Indeed, even if the priority system were purely a creature of the Bureau's administrative powers, the Bureau would need exceedingly persuasive justifications for departing from that system. See, e.g., Smiley v. Citibank (S. Dakota), N.A., 517 U.S. 735, 742 (1996) (citing United States v. Penn. Indus. Chem. Corp., 411 U.S. 655, 670-675 (1973); NLRB v. Bell Aerospace Co., 416 U.S. 267, 295 (1974)). Second, the Bureau cannot arbitrarily assume that any cuts in water usage can be applied based on recent levels of consumption (as the DSEIS modeled) rather than based on contractual levels of entitlement (as the post-2026 EIS should). The baselines set in law are the property or contractual entitlements held by water users, not their actual usage in any given year. Actual usage is not an equitable baseline because it is the product of different practices for different users. For example, consumptive usage in the Districts is low because of investments in efficiency technology. It would be perverse to ignore those investments by adopting principles under which the Districts would have been better off engaging in profligate water use to set a high baseline. Third, the Bureau should be sensitive to the reality that, in a priority-based system, conservation by junior-priority users is possible because of conservation by higher-priority users such as those in the Districts. Junior-priority users in Arizona have been rightly lauded for creating important stores of water underground and elsewhere. But that conservation would not be possible had the Districts not passed along their unused entitlements to junior users through many of the same conservation measure for which users get credit elsewhere--extraordinary management practices in which the Districts are not obligated to engage, but which reduce their consumptive use and leave more water for others. That dynamic runs through many of the decisions facing the Bureau; for example, we discuss it below in connection with the ICS system. Fourth, to the extent the priority system leaves the Bureau discretion in apportioning water--and we believe it has very little--the Bureau must have some reasoned basis for exercising that discretion. For example, it would be plainly arbitrary and unreasoned for the Bureau to apportion water to users that can obtain other sources of water or conserve (or have forgone opportunities to do so). Thus, to the extent that the Bureau expects to exercise discretion, the scope of its analysis for post-2026 operations must include an evaluation and disclosure to the public of which users might receive a favorable exercise of that discretion, why, and with what environmental effects.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20471	10	WATERRIGHT - Water Rights and Agreements	C. One area in which the Bureau may have some limited discretion is in apportioning water to middle-priority users when insufficient water is available to fill all water orders, even after reducing junior-priority users' deliveries to zero. The Bureau must apportion that water equitably and consistently with the larger legal framework. This is a federal function, and is not subject to approval by State legislatures. See 43 U.S.C. SS 617c (providing for contracts directly between the Bureau and water users). Because that apportionment will affect the distribution of water within the Basin, the Bureau must articulate principles now that will allow it to evaluate the actual impacts of its plans for post-2026 operations. To our knowledge, no construct currently exists for apportioning limited water to middle-priority users--a group that crosses state lines, but whose rights are limited by state apportionments. Unlike PPRs, which predated federal appropriation of the Colorado River's waters, middle-priority uses arise as a result of federal contracts and within state apportionments. The CRBPA supports apportioning water to middle-priority users in each State in the familiar 4.4/2.8/0.3 proportion when it identifies those users across States as "users of the same character," placing all middle-priority users on equal footing. 43 U.S.C. SS 1521(b). Contractual language supports understanding the Districts' contracts as arising within Arizona's apportionment, and thus likewise supports apportioning water to middle-priority users proportionately across state lines. Conversely, there is no support for other methods, such as date-based allocation within middle-priority users. No affirmative provision exists in the relevant statutes or court decrees for such a system. Such a system would necessarily ignore state apportionments. And it would be in extreme tension with Congress's consideration and rejection in the Boulder Canyon Project Act of making middle-priority contract rights "subject to the rights of prior appropriators." See Arizona v. California, 373 U.S. at 580.	Irrigation Districts Joint Letter: Wellton-Mohawk Irrigation and Drainage District WMIDD, Yuma Mesa IDD, Yuma Irrigation District, North Gila Valley IDD	Clare Kane
20473	5	WATERRIGHT - Water Rights and Agreements	For example, the Bureau should consider permitting the leasing of water between states/basins while preserving their long-term rights. Compensated contributions from the Upper Basin may be an aid in transitioning the Lower Basin away from a consumptive use utilization for their allocation. We appreciate the efforts that have gone into the $4 billion in IRA funding for compensated conservation, but multiple members were leery of participating in long-term conservation programs that may result in loss of water rights. These issues should be addressed at both a federal and state level if compensated conservation will continue to be a tool in the Colorado River toolbox.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20481	8	WATERRIGHT - Water Rights and Agreements	The Lower Division States believe the Law of the River must be the foundation for the Post-2026 Operations. The existing framework also allows for collaboration and consensus which helps avoid the uncertain outcomes that result from litigation.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20481	9	WATERRIGHT - Water Rights and Agreements	The Post-2026 EIS must analyze whether alternatives are consistent with the 1922 Colorado River Compact non-depletion obligations and delivery obligations to Mexico. Alternatives should include actions necessary to ensure compliance with such obligations.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke

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20497	3	WATERRIGHT - Water Rights and Agreements	Historv of the San Luis Rey Water Rights Dispute and Settlement Escondido and VID, along with the United States and five federally recognized Indian Tribes1and an intertribal consortium known as the San Luis Rey Indian Water Authority ("IWA"), are parties to the San Luis Rey Indian Water Rights Settlement, which is a complex settlement and set of agreements that resolve a decades-long dispute over the right to waters in the San Luis Rey River in northern San Diego County. The San Luis Rey dispute2 began when the United States gave the San Luis Rey River away twice - first to five federally recognized Indian Tribes, and then to Escondido and VID. To resolve the conflict and meet the ongoing water needs of the Tribes and Escondido and VID, Congress directed the Secretary of the Interior annually to provide 16,000 acre-feet of Supplemental Water (i.e., water from a source other than the San Luis Rey River) to the Tribes, Escondido and VID. The Settlement Act also provides for the creation of the IWA to administer the Tribes' share of the Supplemental Water. See Settlement Act, SSSS 106, 107.3 Title II of the Settlement Act authorized the Secretary to line certain previously unlined portions of the All-American Canal and its Coachella Branch to conserve Colorado River water,SS 203, and identified the Canal Lining Projects as a possible source of Supplemental Water to settle the San Luis Rey water rights dispute as among the Tribes and VID and Escondido. See Settlement Act SS 106(a)(2). In 2000, Congress enacted the "Packard Amendment," which directed that Colorado River water conserved by lining the All-American Canal and its Coachella Branch (Canal Lining Projects) would be the source of the 16,000 acre-feet per year for the San Luis Rey Settlement, Public Law 106-377, App. B, SS 211 (October 27, 2000) 114 Stat. 1441A 70. The Packard Amendment added subsection 106(f) to the San Luis Rey Settlement Act: Notwithstanding any other provision of law, in order to fulfill the trust responsibility to the Bands, the Secretary, acting through the Commissioner of Reclamation, shall permanently furnish annually the following: (1) WATER--16,000 acre-feet of the water conserved by the [Canal Lining Projects] for the benefit of the [San Luis Rey Settlement Implementing Parties] [emphasis added]4 Final Settlement and Implementation of the San Luis Rey Settlement After reaching a settlement among themselves, the San Luis Rey Settlement Implementing Parties had to also reach a settlement with the United States. This required additional Federal legislation. See Public Law 114-322, Act of Dec 16, 2016, 130 Stat 1793-94 which added section 112 "Implementation of the Settlement" to the San Luis Rey Settlement Act. Section 112 of the San Luis Rey Settlement Act approves and ratifies the Settlement Agreements among the Settlement Implementing Pai1ies and the United States. After the Settlement Agreement was signed on behalf of the United States by both the Attorney General's Designee and the Secretary of the Interior it was approved by the United States District Court and the Federal Energy Regulatory Commission, and finally took effect.	City of Escondido; Vista Irrigation District	Dana White; Jo MacKenzie
20497	5	WATERRIGHT - Water Rights and Agreements	The Congressional mandate to permanently furnish 16,000 acre-feet per year of conserved water to the San Luis Rey Settlement Implementing Parties for the Settlement and to fulfill the United States' trust responsibility to the Tribes cannot - and must not - be diminished or affected by any new Environmental Impact Statement or the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.	City of Escondido; Vista Irrigation District	Dana White; Jo MacKenzie

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20502	8	WATERRIGHT - Water Rights and Agreements	A. Any new EIS must adequately address impacts to the Nation's water rights settlement The 2007 FEIS explicitly included the Nation's SAWRSA settlement as an ITA.23 As noted above, through the Nation's SAWRSA settlement, as amended, the Nation obtained a substantial CAP entitlement in return for releasing claims concerning damages to its federal reserved rights. These rights were confirmed through the 2004 Arizona Water Settlements Act, well before the 2007 Interim Guidelines were developed. And yet the Interim Guidelines and 2007 FEIS did not take into account how the Secretary's obligation under SAWRSA to deliver this water notwithstanding a declaration of shortage would be impacted by the Guidelines, nor how the Secretary would provide compensation in the event that she is unable to fulfil this obligation. Moreover, the 2007 FEIS did not provide any analysis or discussion of the impact of potential shortages on its firming obligation under AWSA, a fundamental obligation that underpins SAWRSA, and one that Reclamation must carry out for 100 years from the effective date of AWSA (i.e., through the year 2107). Reclamation repeatedly has acknowledged that firming requires the Secretary to identify and secure significant resources and alternative water supplies. Unfortunately, throughout the Interim Guidelines period, rather than taking a proactive approach to secure these resources in non-shortage years, Reclamation largely ceded control to non-Indian interests, thus exacerbating the impact, during shortage years, of shortages on the Nation. A key example is Reclamation's dispute with the Central Arizona Water Conservation District (CAWCD) over Central Arizona Project Excess Water.24 Reclamation's 2007 Stipulation with CAWCD over CAP repayment provides Reclamation with a priority right to purchase Excess Water, which Reclamation may then subsequently store for Indian firming - a right that Reclamation describes as a "critical resource for meeting the federal firming obligation."25 In violation of the stipulation, CAWCD instead diverted Excess Water for non-Indian programs, resulting in a loss to Reclamation's firming program of tens of thousands of acre-feet.26 But apart from a series of strongly-worded emails and letters and comments submitted to the Arizona State Auditor, it is unclear whether Reclamation has taken formal action to recover these lost resources. In addition, the 2007 FEIS also did not adequately address impacts to all of the Nation's water entitlements. While acknowledging the existence of the 8,000 acre-feet of Indian priority water contracted for delivery to the Sif Oidak District, the 2007 FEIS inexplicably claimed that "As this water is not presently part of a water rights settlement, it is not considered an ITA." But this high priority water was set aside precisely in anticipation that it may be included in a water rights settlement, and has gone unused in part due to the federal government's ongoing failure to construct on-reservation irrigation infrastructure necessary for the Nation to take delivery. In its NOI, Reclamation suggests that the new Guidelines will take a "holistic approach to Colorado River management." In order to truly fulfil this ideal, and to satisfy its trust responsibility to protect SAWRSA as an Indian Trust Asset, Reclamation must prioritize the protection of the Nation's SAWRSA entitlement and the firming resources that supply it, and must undertake the investigation and analysis necessary to ensure that any potential shortage strategy or reservoir protections do not negatively impact this entitlement and these resources.	Tohono O'Odham Nation	Verlon Jose
20624	3	WATERRIGHT - Water Rights and Agreements	Western water law needs to be re-visioned. California has too much power based solely on the good fortune of geography that allowed them to become 1st in time, 1st in right. It's not right if you are Colorado or Wyoming or other more junior lessor 'users'. These are basin states not users!		Steve Munsell
20700	2	WATERRIGHT - Water Rights and Agreements	We believe the development of the post-2026 guidelines is a key opportunity to acknowledge the errors in the foundational underpinnings of the Law of the River, begin the process to transition away from those rules,	Grand Canyon Trust	Jen Pelz
20700	12	WATERRIGHT - Water Rights and Agreements	2. The foundational objectives of the post-2026 guidelines must be modified to ensure the sustainability of the Colorado River and its tributaries. Reclamation needs to expand the objectives of the post-2026 guidelines beyond the narrow and outdated goals of the Law of the River to ensure equity and sustainability in the basin for both people and nature for generations to come.	Grand Canyon Trust	Jen Pelz
20700	15	WATERRIGHT - Water Rights and Agreements	Likewise, the Law of the River itself typically does not include or integrate the value of the river, the environment, or incorporate specific protections that are based in the law. For example, the Grand Canyon Protection Act of 19928 is not typically considered as part of the "Law of the River," nor are other environmental and cultural protections (e.g. the Endangered Species Act, the Natural Historic Preservation Act, the Clean Water Act, the Wild and Scenic Rivers Act, among others). These laws were all passed much later in time--in response to the consequences this omission (e.g. species extinction, pollution, etc.). It is time that these two parallel worlds are intermingled. We can't keep creating policies on one hand to meet the needs of water users and on the other hand create different laws that help mitigate the damage being done. What if the laws that allocated and managed water also integrated buffers and mandates to ensure cultural values were honored and the river would continue to flow and thrive? This should be the goal of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz

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20700	23	WATERRIGHT - Water Rights and Agreements	c. The gap between supply and demand will only increase given the need to recover reservoir storage, account for climate change, and satisfy unfulfilled tribal water entitlements. Notwithstanding the increasing demand for water to recover reservoir storage, account for climate warming, and meet the unfulfilled promises of water for the tribes, climate scientists predict runoff will decline by an additional 1-3 million acre-feet per year by 2050.12 This further reduction in supply and increasing demands only widens the supply-demand gap. Kuhn and Jacobs (2022) noted this predicament and acknowledged that due to the historic imbalance of supply and demand "[w]e are now engaged in a stressful balancing act due to the historical commitments." Id. at 46. The authors note the "great deal of ingenuity" that has gone into developing "work arounds" to making any change to the original allocations. Id. at 47. However, "future conditions are expected to be much more challenging, and the existing management framework is inconsistent with what is now known about hydrologic realities and economic consequences." Id. at 47. Thus, it may be time for the basin states in concert with the U.S., Mexico and 30 basin tribes to come together to finally update or modify the original compact allocations, resolve some of the uncertainties that have remained for a century, and move toward a new system. Kuhn and Jacobs (2022) suggest "[a] nonstationary allocation scheme is needed because the river system is now very unpredictable and inherently dynamic, and the stakes are extremely high. The vise-grip created by the Colorado River Compact's flow obligations and climate change's impacts on the basin's hydrology benefits the Lower Basin states at the expense of the Upper Basin states, tribal sovereigns, and the river system's ecosystems." Id. at 66.	Grand Canyon Trust	Jen Pelz
20817	10	WATERRIGHT - Water Rights and Agreements	The Law of the River must be the foundation for the Post-2026 Operations, anchored by the 1922 Colorado River Compact and the 1948 Upper Colorado River Basin Compact ("Compacts") together with the 1944 Treaty with Mexico.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	26	WATERRIGHT - Water Rights and Agreements	10. List the schedule of priority rights in the Upper and Lower Basin to give the public a better understanding of the differences between the two basins. We believe this will highlight a significant discrepancy in record keeping. 11. Account for all proposed dams and diversions on all tributaries and the main stem to help the public better understand future depletions that could affect the outcomes considered in the DEIS.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	9	WATERRIGHT - Water Rights and Agreements	Imperial Valley Water Rights Any alternative considered in the EIS should respect Imperial Valley's senior water rights.		Craig Morgan; Mike Abatti; James Abatti
20912	5	WATERRIGHT - Water Rights and Agreements	IVH2O believes the Imperial Irrigation District has no obligation for further reduction in its water allocation and we oppose any modification of our water rights. Therefore, it is our opinion that future Colorado River reservoir operating guidelines must follow and respect the priority system. Several months ago, the Bureau proposed a Supplemental Impact Statement (SEIS) for near-term Colorado River Operations. IVH2O took issue with several alternatives proposed. Action Alternative 2 utilized the terms "pro rata," "fair and equitable" which are not terms used in legal interpretation of Colorado River water rights. We discourage the Bureau from evaluating future operating guidelines which resemble Action Alternative 2 and disregard the priority system, a tested principle of water law. As landowners in the Imperial Valley, we view any action that infringes upon our Present Perfected Rights (PPR) as an unconstitutional "taking."	Imperial Valley Water (IVH20)	Stephen Benson
20912	6	WATERRIGHT - Water Rights and Agreements	We also object to the use of the term "Concept of Priority" in the Bureau of Reclamation's four public webinars associated with the SEIS for near-term Colorado River Operations. How can you refer to an act of Congress which has been adjudicated at all levels of the U.S. court system simply as a concept? During the Bureau webinars, tribal water rights were referred to as a matter of settled law. Imperial Valley landowners have the same water rights standing as Native American Tribes with pre-1922 water rights. Why then relegate PPRs, with the same interpretation of water law, simply as a "concept of priority?" This illustrates a deliberate attempt to diminish the Law of the River as it pertains to the priority system. We request the Bureau maintain the integrity of Law of the River in developing post-2026 Colorado River operating guidelines.	Imperial Valley Water (IVH20)	Stephen Benson
20912	8	WATERRIGHT - Water Rights and Agreements	Furthermore, we ask that the Bureau consider providing a ten-year rolling average of IID' s water allocation offering credit for unused water which is made available to junior priority users and avoiding single year overrun payback.	Imperial Valley Water (IVH20)	Stephen Benson

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20913	10	WATERRIGHT - Water Rights and Agreements	Glen Canyon Dam is incapable of meeting delivery obligations at low levels At elevation 3,430, the dam is physically incapable of releasing enough water annually to meet Upper Basin delivery obligations, based on current interpretations of the Law of the River31. Failure to deliver these agreed upon amounts could result in technical, legal, engineering, and environmental problems for all members of the Basin. While the Upper Basin Delivery obligation of 7.5 million acre feet per year (and 75 million acre feet over ten years), is a cornerstone of the Law of the River, it should be noted that ongoing policy discussions around the Law of the River argue that this interpretation should be updated and that it is unrealistic for the "75 in 10" policy to continue as is32. Nevertheless, it is unclear what changes the Law of the River may undergo in the future, and it's likely that Glen Canyon Dam's structural limitations hinder the system's ability to adapt to those changes.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	4	WATERRIGHT - Water Rights and Agreements	Furthermore, the United States Supreme Court affirmed the division of the Lower Basin's entitlement to 7.5 maf of mainstream Colorado River water with 4.4 maf allocated to California, 2.8 maf allocated to Arizona and 300 kaf allocated to Nevada. Arizona v. California, 373 U.S. 546 (1963). The Court issued a Decree and an injunction requiring the Secretary to, among other things, deliver 7.5 maf of water to users in Arizona, California and Nevada "pursuant to valid contracts therefor made with such users by the Secretary of the Interior, pursuant to Section 5 of the Boulder Canyon Project Act or any other applicable federal statute." 2006 Consolidated Decree, Arizona v. California, 547 U.S. 150, 156 (2006). The Decree and injunction also govern the Secretary's distribution of water during surplus, normal and shortage conditions. Id.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	18	WATERRIGHT - Water Rights and Agreements	Illegal Uses CAWCD's master repayment and water delivery contract allows it to take delivery of all water remaining under Arizona's 2.8 million acre-foot entitlement after Arizona's 1st through 3rd priority uses have been satisfied, sharing up to 164,652 acre-feet of that supply with other Arizona 4th priority water users. In recent years, Reclamation has allowed certain Arizona 5th priority users2 and unauthorized users3 to divert water even under Tier 1 and deeper shortage conditions, unlawfully cutting into the supply available to CAWCD. Moreover, the unauthorized water users on the mainstem must not be characterized as legally authorized to use Arizona's 2.8 maf in the EIS. This mischaracterization of unauthorized users could have the effect of distorting the results of shortage in a way where the total reductions to the CAP supply is overstated.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20925	9	WATERRIGHT - Water Rights and Agreements	Protections for agriculture must be built into the post-2026 operating guidelines. As near-term actions call for additional conservation, the focus has turned to agriculture to provide much of the additional supplies to maintain levels in Lakes Mead and Powell. However, going forward, there must be recognition of the importance of agriculture, both to the economy of California and to food production for the nation. To that end, and in safeguarding the priority right system memorialized in the Colorado River Compact of 1922, longstanding federal laws, intrastate agreements, and Supreme Court rulings, the post-2026 guidelines should further protect agricultural water supplies through language that acknowledges the critical role of agriculture.	San Diego County Water Authority	Dan Denham
20932	16	WATERRIGHT - Water Rights and Agreements	The Upper Division States expressly reserve their rights under applicable law, including, but not limited to, the Law of the River. Nothing in this letter is intended to be, nor shall be construed to interpret, diminish, or modify the rights of the Upper Division States or the UCRC under federal or state law or administrative rule, regulation, or guideline. This submittal is not intended to be, and shall not be construed in any way as, a waiver of any such rights. Moreover, we reserve the right to provide further comments, consult with the Secretary, take any other necessary steps, and engage with Reclamation as it proceeds with subsequent phases of the Post-2026 Operations NEPA process.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20936	3	WATERRIGHT - Water Rights and Agreements	The Community acknowledges that the EIS must be developed within the legal framework of the 1922 Colorado River Compact, the Boulder Canyon Project Act of 1928 (45 Stat. 1057), the Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande, Treaty Between the United States of America and Mexico, Treaty Series 994 (59 Stat. 1219), the Colorado River Storage Project Act, the Consolidated Decree entered by the Supreme Court of the United States in Arizona v. California, 547 U.S. 150 (2006), and other statutes and minutes that comprise the Law of the River. But the Community also recognizes that the foundations of the Law of the River were largely developed to encourage the development of non-Tribal water projects within the Colorado River Basin with no concern or appreciation of where the Colorado River Basin is today; with demand not in balance with supply, and continued aridification of the region the likely long term impact of climate change. Long term, the Colorado River Basin faces unprecedented risks and Reclamation should develop an EIS that enables it to exercise its full authority to manage the Colorado River System in a fair and equitable manner that stabilizes operations by addressing the imbalance between supply and demand within the Colorado River System.	Gila River Indian Community	Stephen Lewis
20946	2	WATERRIGHT - Water Rights and Agreements	The Law of the River makes clear that the Association's and others' priority of use with respect to Colorado River water must be respected. Any post-2026 guidelines and strategies, including any conservation efforts,2 must therefore adhere to the existing priority system, which is described more fully below.	Yuma County Water Users' Association	James Auza
20946	4	WATERRIGHT - Water Rights and Agreements	Over the past I00 years, the Law of the River has never wavered with respect to the sanctity of the priority system and PPRs. Any post-2026 guidelines and strategies for Lake Mead and Lake Powell should thus adhere to the priority system, respect PPRs, and uphold the Law of the River.	Yuma County Water Users' Association	James Auza

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20952	24	WATERRIGHT - Water Rights and Agreements	Effect of Historic Inequities on Tribal Water Rights Executive Order 14096 directs agencies to identify, analyze, and address historical inequities and systemic barriers related to any Federal regulation, policy, or practice that impairs the ability of tribes who may have environmental justice concerns to achieve or maintain a healthy and sustainable environment. Tribes have been historically excluded from river governance, apportionment decisions and federal developments and to this day tribal water rights remain unresolved, inaccessible, or unquantified. For example, the Central Arizona Project is the single largest provider of water to tribal communities in the Colorado River system but has very junior (4th priority) water rights. 28 Because tribal water rights are tied to the CAP priority date and delivery system, available water could be reduced to zero depending on shortage levels. EPA recommends acknowledging historic and present inequities or systemic barriers to indigenous water rights. Discuss policies, programs or funding opportunities specifically designed to correct or remove inequities or barriers; provide tribes with more clarity; maintain or construct infrastructure for the delivery of or access to Colorado River water for tribal use; or develop replacement water resources. 28 See e.g., Central Arizona Project. 2023. Tribal Water Rights, https://www.cap-az.com/about/tribal-water-rights/ and 2007 Interim Guidelines Final Environmental Impact Statement (Reclamation 2007).	Environmental Protection Agency Region IX	Robin Truitt
20958	1	WATERRIGHT - Water Rights and Agreements	Colorado, unlike a majority of western states within the basin, allows for conditional water rights. Conditional water rights are those water rights which have been judicially decreed by the court but have never been put to beneficial use by the owner. Owners of these conditional rights are often allowed by water courts in Colorado to repeatedly extend the deadline to perfect their conditional rights thanks to the low bar they must meet to show they are "diligently" working to put their right to a beneficial use. On top of low standards, the water courts in Colorado are hesitant to cancel conditional water rights for economic infeasibility despite having anti-speculation laws on the books. One industry, in particular, has taken advantage of these weak rules to hold onto conditional rights for decades. The old saying goes, "Oil shale is the next big thing, and it always will be." Oil shale companies in Colorado, with the blessing of the state water courts, have been repeatedly extending the deadline to perfect conditional rights, in some cases, for nearly 70 years. The main issue here is not how old some of these rights are, but the sheer volume of water associated with these rights. A study conducted by Western Resource Advocates in 2009 found that nearly two-million acre-feet of water was being held in a conditional status by oil shale production companies (greater than the entitlement owed to Mexico) . If all of these rights begin diverting water, it will be an issue for Colorado, and potentially the entire Colorado River Basin. Conditional water rights could greatly complicate the ability of Colorado to adhere to its allotment and meet its obligations under the Colorado River Compact. We encourage the Bureau to discuss the issue of conditional water rights with Colorado to understand how Colorado is planning for the potential that those rights could be put to beneficial use in the years to come. We also suggest that the NEPA analysis for the post-2026 operating guidelines should clearly disclose this issue and describe how it has been addressed in the alternatives and analysis of environmental impacts.	Getches-Wilkinson Center for Natural Resources, Energy, and Environment Colorado School of Law	Andrew Teegarden
20972	4	WATERRIGHT - Water Rights and Agreements	The Bureau's post-2026 plans and supporting environmental analysis must follow the Law of the River. The Law of the River establishes the priority system, which the Bureau lacks the authority to alter within the current process. As such, reconsideration of the priority system is necessarily outside the scope of the post-2026 process. However, proper application of the priority system is vital to correctly evaluating the impacts of any Bureau plan for post- 2026 operations.	Unit B Irrigation and Drainage Districts	meghan noblelaw.com; Connie Beshears
20981	1	WATERRIGHT - Water Rights and Agreements	The Jicarilla Apache Nation's reservation lands span more than 879,000 acres in north central New Mexico. The Nation's lands are in the upper reaches of the San Juan River Basin and straddle the Continental Divide. The Navajo River, which is a tributary to the San Juan River, is a perennial stream on the Reservation and the primary source of the Nation's domestic water supply. The Nation has settled water rights to more than 45,000 acre-feet of Colorado River water as well as claims related to other river systems.	Jicarilla Apache Nation	Edward Velarde
20981	4	WATERRIGHT - Water Rights and Agreements	Preserving and Protecting Tribal Water It is essential that all involved parties have realistic expectations, based on the best available science, regarding the amount of water available from the Colorado River system and where that water comes from. While the Nation recognizes the value of short-term actions, such as temporary voluntary compensated reductions, the Nation encourages focus on the long-term goal-stabilizing and protecting the river for years to come. Long-term stability cannot occur if non-tribal water users continue to rely on large quantities of "unused" tribal water to serve their needs. Long-term stability will require development of systems that recognize the value of Basin Tribes' water contributions, allow Basin Tribes to be fully and fairly compensated for those contributions, and preserve and protect the rights of Basin Tribes to develop and use tribal water when and how they best determine. The post-2026 framework must ensure that sufficient flexibility is created and preserved for tribes to develop and participate in programs that serve these purposes, and must make accommodations, when appropriate, for treating tribes different from other water users within the Colorado River system.	Jicarilla Apache Nation	Edward Velarde
20986	1	WATERRIGHT - Water Rights and Agreements	Moreover, nothing in this letter is intended to, nor shall be construed to interpret, diminish, or modify the rights of the State of New Mexico under federal or state law or administrative rule, regulation, or guideline.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez

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20993	6	WATERRIGHT - Water Rights and Agreements	6. Implement operating strategies to stay within current Compact apportionment based on efficiencies, conservation, and infrastructure improvements, rather than on migration of water resources from Upper to Lower Basin; specifically prohibit the severing of a water right located and beneficially used in the Upper Basin through sale and transportation to a Lower Basin location.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21087	1	WATERRIGHT - Water Rights and Agreements	While Nebraska does not lie within the Colorado River Basin, she derives substantial benefits from trans-basin diversions of Colorado River water. Those trans-basin diversions facilitate Colorado's compliance with the South Platte River Compact. Operational changes that compromise trans-basin diversions would adversely affect Nebraska, whose rights under the South Platte River Compact should be considered as post-2026 operational alternatives are evaluated.	Nebraska Department of Natural Resources	Thomas Riley
21161	1	WATERRIGHT - Water Rights and Agreements	My biggest concerns for the Colorado River basin are the designation of water rights based on a historically wet period. This has led to chronic overharvesting from the river. New designations need to me made to protect the entire watershed based on the lowest precipitation years, not the highest.		Stephanie Vaughn
21162	3	WATERRIGHT - Water Rights and Agreements	*In the next 5-10 years, Abolish the privatization of water. Private companies do not have the right to own and distribute a resource that is fundamental to all life on the planet.		Kyle Aldridge
21288	5	WATERRIGHT - Water Rights and Agreements	we urge Reclamation to equitably spread reductions in the lower Basin amongst all water users in three lower Basin States to help stabilize the system. We also ask Reclamation to consider and analyze the impact of actions to be taken by the Upper Basin States, such as shortage reductions and continued DROA releases.	City of Goodyear	Barbara Chappell
21301	8	WATERRIGHT - Water Rights and Agreements	Along those lines, the "Use It or Lose It" rule is a disincentive to conservation and improving efficiencies and should be eliminated.	Mohave County Water Authority	Jamie Kelley
21302	7	WATERRIGHT - Water Rights and Agreements	Protection of high-priority rights holders, including tribal rights. A corollary to the first objective is that, in the absence of a truly disastrous situation in which extraordinary actions could become necessary, Reclamation's management regime should adequately protect higher-priority users of water in a manner consistent with settled expectations around water rights. By their nature, system reservoirs provide the greatest protection to more junior water users by smoothing out highly variable annual supplies. However, that smoothing function cannot and should not include mining reservoir storage over any period of time, particularly when remaining storage is no longer adequate to protect higher-priority users or where forecasts and trends indicate that storage utilized to protect junior users cannot reasonably be expected to be recovered near-term. A basic management objective should thus be to ensure that adjustments to allocations that will impose shortages on more junior users occur promptly enough and at a sufficient scale that it will not jeopardize a core volume of storage within the system.	City of Phoenix	Cynthia Campbell
21302	15	WATERRIGHT - Water Rights and Agreements	Water Supply & Water Rights. The EIS should include a clear analysis of key water supply, demand, and water entitlement-related issues to better provide stakeholders with a clear understanding of potential changes to their water supply operations. These should include, for example (1) estimated water supply shortages for each Colorado River entitlement holder and subcontract holders such as Central Arizona Project (CAP) subcontractors, (2) potential impacts of reservoirs reaching dead pool on holders and subcontractors, (3) impacts on groundwater from changes in recharge activities or as a result of users turning to groundwater to replace Colorado River surface supplies, and (4) different sets of demand assumptions for modeling (e.g. different rates of growth, demand responses to changes in water supply or temperature) to better reflect potential future conditions.	City of Phoenix	Cynthia Campbell
654	5	WATMODEL - Water Management and Modeling	The first rule, then is to manage with the river Â– to provide allocations based on proportions of the running average of previous five yearÂ's reconstructed natural flows. A five-year running average provides some level of certainty and allows allocations to track what the river is doing. Longer than five years risks a bias toward higher volumes and more rapid depletions of reservoir storage. Shorter than five years risks sudden year-to-year changes in allocations.	University of Arizona	Flessa, Karl W - (kflessa)
922	1	WATMODEL - Water Management and Modeling	The City greatly appreciates that Reclamation will be using a DMDU approach for the Post-2026 process, as this framework will make the selection of particular hydrologic ensembles/scenarios relatively less important in communicating outcomes and informing risks. Nonetheless, the choice of future hydrologic ensembles will still have an impact on the communication and perception of risk under different policies, and it is critical that the ensembles are considered carefully to ensure that these early choices translate into sound decision-making. (See attachments for Letter #922 for figures)	City of Phoenix	Peter Culp

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922	2	WATMODEL - Water Management and Modeling	1. The long-term warming trend in the Colorado River Basin will continue for the foreseeable future. This means that ensembles based purely on historical observations will underestimate the risk of future drought conditions. Temperatures in the CORB have increased by over 1Â°C relative to the 1909-1999 average, and under even a lower greenhouse gas emissions scenario another 3-4Â°C can be expected by the end of the century. Because warming increases evapotranspiration, it also decreases streamflow (e.g., Vano and Lettenmaier, 2014; Udall and Overpeck, 2017). The figure below shows Lee Ferry naturalized flow over its entire period of record and shows how the 20th century warming has manifested in the long-term trend in flow. As warming accelerates in the CORB, this long-term drying trend is also likely to accelerate, which means that hydrology ensembles based entirely on historical observations are very likely to have a wet bias. For these reasons, we ask that USBR consider removing or substantially limit the number of hydrology scenarios that are based entirely on historical observations and include a larger number of scenarios that account for future warming, as discussed below. (See attachments for Letter #922 for figure)	City of Phoenix	Peter Culp
922	3	WATMODEL - Water Management and Modeling	2. Hydrology ensembles based on downscaled climate model outputs may provide some useful information regarding future drought conditions, but they also introduce artifacts that could undermine their utility. GCMs and the land surface models to which they are linked do not capture precipitation and runoff well, particularly in mountainous terrain like the Upper Basin where nearly all the runoff in the Colorado river originates (e.g., Vano et al., 2014). In addition, the downscaled hydrology outputs driven by CMIP3 and CMIP5 climate model ensembles generate unrealistically high upper-end flow projections when compared to all the other ensembles. These extremely high modeled flows are not well understood, but they may be related to statistical artifacts introduced by the downscaling methods themselves (e.g., Vano et al., 2020; Figure 2), rather than a realistic representation of future conditions. As shown in the USBR presentation materials, the CMIP ensembles also do not generate extreme low-end flows as consistently as the temperature informed scenarios (see discussion below). Thus, these CMIP ensembles â€" with potentially significant oversampling of wet years but without lower-end flows that are predicted by future warming â€" could significantly affect simulated reservoir elevations, masking future drought risks that would otherwise be apparent. For this reason, we recommend that USBR ensure that it fully understands the nature of the methodological artifacts that are biasing the GCM-derived ensembles before incorporating them, or at least clearly identify the nature of the artifacts that are potentially associated with them in public-facing materials. (See attachments for Letter #922 for figure)	City of Phoenix	Peter Culp
922	4	WATMODEL - Water Management and Modeling	3. Climate models agree on a large and statistically significant increase in temperature in the Colorado River Basin through the 21st century, but future precipitation trends are less certain. Hydrology ensembles should leverage the more robust projected temperature trend to inform future risks of drought. The raw GCM ensembles generally show negligible to single digit percentage changes in projected annual average precipitation (2-6%) in the upper CORB, where the vast majority of runoff in the basin is generated (Figure 3). At the same time, GCM outputs project significant changes in projected temperature throughout the CORB â€" generally 3-4Â°C under a lower emissions scenario and 4-6Â°C under a higher emissions scenario (Figure 3). Even the lower emissions scenario (RCP 4.5) implies maximum precipitation increases of only 6%, but temperature increases of 3-4Â°C, in the Upper Basin. Assuming a moderate sensitivity of a 6.5% decrease in runoff per degree C (Vano and Lettenmaier, 2014; Udall and Overpeck, 2017), these changes imply that future decreases in Colorado River runoff due to temperature changes alone are likely to be 3-4 times larger than any increases in precipitation projected by the GCMs. Because the GCM-projected temperature increase in the Upper Basin is larger and more consistent across models and scenarios, we recommend that ensembles driven by temperature adjustments (e.g., â€œTemp Adj. RCP4.5â€ and â€œTemp Adj. RCP8.5â€) be primarily used to inform future operations, and/or that other similar ensembles be developed to supplement these initial ensembles. While we recognize that the methodology used to produce the temperature adjusted ensembles may be simplistic, they do provide a range of outcomes that could well be associated with continued temperature increases, and are more plausible than, for example, our continued use of the historic record without any adjustment. (See attachments for Letter #922 for figure)	City of Phoenix	Peter Culp
922	5	WATMODEL - Water Management and Modeling	Although there will always be uncertainty about what the future hydrology in the Colorado River will look like, we have seen over the past decade that the largest risks to water management arise from underestimating the potential severity of drought. The hydrology ensembles that are used to inform Colorado River operations therefore must sample enough plausible dry-end scenarios to ensure that the management of Colorado River water is robust to future droughts, which may be more severe than anything we have yet witnessed. The science is clear that we should expect continued warming in the Colorado River Basin through the 21st century, and that this warming will be larger than the warming we have already observed. Furthermore, we know that increasing temperatures lead to decreased runoff even in the absence of any changes in precipitation. Of the hydrology ensembles currently under consideration from USBR, only the temperature adjusted scenarios (and potentially the new ensemble under development) seem to directly incorporate this signal without introducing significant uncertainties due to potential GCM and downscaling-derived artifacts related to precipitation. (See attachments for Letter #922 for figure)	City of Phoenix	Peter Culp

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922	6	WATMODEL - Water Management and Modeling	We recognize the potential limitations of using temperature projections alone to generate future hydrology ensembles. For example, these ensembles are likely to under-represent the potential for future high flow extremes, since the temperature adjustment has a uniformly drying effect. There is also uncertainty regarding the overall temperature sensitivity of runoff, which could range from -3%/Â°C or less to -12%/Â°C or more (e.g., Vano et al., 2014). Including other ensembles (e.g., â€œPaleo Recordâ€ or â€œPaleo Conditionedâ€) that potentially sample higher-end extremes, and expanding the temperature adjusted scenarios to include a wider range of temperature sensitivities, could improve the representation of potential future flows to overcome these shortcomings. However, the most important criterion in our mind is that the hydrology ensembles must sample a wide enough range of plausible low-end flow scenarios to ensure that the DMDU process leads to operational rules that are robust to the range of potential future droughts. (See attachments for Letter #922 for figure)	City of Phoenix	Peter Culp
922	7	WATMODEL - Water Management and Modeling	Of the ensembles presented by USBR at the July session, the temperature-adjusted ensembles best accomplish this goal. We also look forward to better understanding and discussion of the new planned ensemble that is under development.	City of Phoenix	Peter Culp
13108	2	WATMODEL - Water Management and Modeling	The Post-2026 Guidelines need to address the deficiencies of the 2007 Interim Guidelines and the overuse of water, while allowing for development of water by tribes in the Basin. One way to address a reduction in water use is to include an accounting for evaporation and system losses in the Lower Basin. This is a natural occurrence, and it should be accounted for. Another way to address the overuse of water is to limit water use to the actual hydrology that is provided instead of using creative accounting and exhausting the reservoir storage. The Upper Basin has to live with the hydrology, and the Lower Basin should also have to do so. Reclamation must include measures in the Post-2026 Guidelines that will protect the water levels and infrastructure of Lake Powell and Lake Mead.	Southern Ute Indian Tribe	Astor, Feather
16804	2	WATMODEL - Water Management and Modeling	It also requires using the best available climate and hydrologic science and modeling, including recent advances in understanding uncertainties around how streamflow responds to warming temperatures, extreme events such as wildfires, and other dynamic climate-induced changes to influence available water supply.	University of Nevada, Reno; Arizona State University	Elizabeth Koebele; Margaret Garcia
16821	4	WATMODEL - Water Management and Modeling	4. Consider the amount of water that is lost to evaporation and seepage, especially in the Lower Basin. It is well known that evaporation and seepage are responsible for approximately 1.5 million acre feet of water loss every year, this loss needs to be accounted for in the post 2026 operational guidelines.		Teal Lehto
17202	9	WATMODEL - Water Management and Modeling	*Addressing a broad range of future hydrologic and operating (including grid) conditions;	CREDA Colorado River Energy Distributers Association	Leslie James
17241	31	WATMODEL - Water Management and Modeling	Enable decision-making under uncertain future conditions - As stated in Reclamation's Federal Register notice, climate change makes future hydrologic conditions on the Colorado River unknowable. Reclamation has long relied on a probabilistic approach to projecting future hydrology, which has proven inadequate to capture the extent and pace of climate change impacts over recent decades. Reclamation's decision process will create a more sustainable operating framework - and a more sustainable Colorado River - if it considers hydrologic futures far more extreme than could be captured in a data-set premised on a river that provides a mean annual average of 11 million acre-feet, or 9 million acre-feet, or even 7 million acre-feet. The basin needs an operational regime that will stand up to the fullest range of future conditions imaginable.	National Audubon Society	Jennifer Pitt
17241	35	WATMODEL - Water Management and Modeling	In addition, Reclamation should be transparent about any considerations of "paper water" or "miracle water" - in other words considerations of water as if it exists in a location when it does not in fact exist - in the context of modeling reservoir operations and shortages. The use of "miracle water" in the 2012 Colorado River Basin Study obscured water supply deficits in the basin, both in the Upper Basin where Compact delivery deficits were not calculated, and in the Lower Basin, where modeled shortages were based on the assumption that Upper Basin deliveries to the Lower Basin were successfully complying with delivery obligations in the Colorado River Compact. Given the broad public interest in Colorado River water availability under the terms of the Colorado River Compact, it will be extremely important for Reclamation to provide clear and thorough explanations for any modeling assumptions that could potentially obscure these results.	National Audubon Society	Jennifer Pitt
20310	6	WATMODEL - Water Management and Modeling	We also ask the Bureau avoid considera,on of misleading hydrology projec,ons. "Effec,ve" reservoir eleva,on is clearly double coun,ng to facilitate manipula,on of Junior water in dry years. The Imperial Valley, holders of Senior water rights, is effec,vely subsidizing urban economic expansion by holders of Junior water right. Also, while modeling addresses economic impacts, it fails to evaluate impacts on domes,c food produc,on, food supply and food prices. Modeling also doesn't address nega,ve impacts, including economic impacts, air quality, loss of electric power genera,on and environmental degrada,on, to predominantly agricultural communi,es from conserva,on measures such as fallowing. Finally, we point out environmental impact analysis must take into considera,on impacts to Salton Sea or nearby wildlife reserve due to major curtailments in water deliveries to Imperial Irriga,on District (IID) customers.	Imperial County Farm Bureau	Rachel Magos

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20310	7	WATMODEL - Water Management and Modeling	Regarding water accoun,ng, we suggest the Bureau evaluate implementa,on of a July-June water year. This ,ming beVer suits Colorado River Basin agriculture produc,on seasonality and crop planning needs. Furthermore, we ask that the Bureau consider providing a ten-year rolling average of IID's water alloca,on offering credit for unused water which is made available to junior priority users and avoiding single year overrun payback.	Imperial County Farm Bureau	Rachel Magos
20341	10	WATMODEL - Water Management and Modeling	Reclamation should endeavor to use high-quality information, incorporating the best available science and data, to describe reasonably foreseeable environmental trends and effects, including anticipated climate-related changes to the environment in its analyses and forecasting methodologies to quantify reservoir conditions, inflow projections, and operational decision-making. With regard to data, Reclamation needs to use current, accurate data reflecting recent meteorological and runoff conditions, which have varied widely in recent years notwithstanding long-term, climate change-related decreases in overall precipitation and snowpack. Reclamation should clearly explain its data and modeling assumptions and/or limitations of the information so that the public and decisionmakers can understand whether the EIS's assumptions are substantiated and how Reclamation reaches its conclusions.	Imperial Irrigation District	Shields, Tina L
20355	3	WATMODEL - Water Management and Modeling	Modeling Assumptions with Respect to Upper Basin Depletions Reclamation should clearly describe all modeling assumptions and inputs used in its projections of unregulated inflows into Lake Powell. In particular, Reclamation should provide a table listing assumed annual Upper Basin depletions. Does Reclamation use the Upper Colorado River Commission's June 14, 2022, Updated Demand Schedule? An average of recent depletions reported in the provisional Consumptive Uses and Losses reports? Recent averages modified by presumed water availability under hotter and drier conditions? Clarifying these modeling assumptions will improve our understanding of potential inflows to Lake Powell and projected elevations at Powell and Mead.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20355	4	WATMODEL - Water Management and Modeling	Modeling with Evolving Climate Science How will Reclamation utilize the latest climate modeling, including downscaling, to develop better, higher resolution, more protective estimates of the impacts of various future climate scenarios? Recent work from numerous researchers has demonstrated that increased temperatures, extreme heat, and reduced snow albedo have led to dramatic reductions in river flows. This must be analyzed and modeled under various climate futures, at least through 2060. Also, as the last 23 years of drought and this summer's record heat have demonstrated, scenarios must capture the outer range of projected outcomes because variability in climate conditions is so much greater than what was projected only a few short years ago. We suggest the analysis of a scenario with a 5-6M AFY reduction in water supply allocations in order to capture potential extreme drought and heat scenarios. Lake Mead Shortage Conditions The rapid and continuing loss of system storage has demonstrated that existing reservoir elevation-based shortage criteria are insufficient. A more aggressive set of Lower Basin shortage criteria that also accounts for current and projected basin runoff should be implemented. Reclamation should consider an alternative that determines Lake Mead "Shortage Conditions" based on factors including estimates of current and future runoff under very dry conditions (such as 2002-2004 or 2020-2022 runoff), existing storage in Lake Mead and Lake Powell, Treaty obligations, contractors' annual water orders, and operational and regulatory constraints such as the federal Endangered Species Act and Grand Canyon Protection Act requirements. Reclamation should also consider a shortage alternative that ignores Lake Mead elevation once an August 24-month minimum probable projection shows it falling below 1075' and simply limits Lake Mead releases to prior year inflows less reservoir evaporation.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20355	9	WATMODEL - Water Management and Modeling	Allocation of Lower Basin Evaporation The scope of the Post-2026 EIS should include the allocation of Lower Basin Evaporation. While a portion of Upper Basin evaporation has been assigned to individual Upper Basin states, the entirety of Lower Basin evaporation - estimated at 0.8 MAF for 2021 -- is borne by the system, rather than that the states. This glaring difference between Upper and Lower Basin accounting hinders partnership and cooperation. Allocating evaporation from Lower Basin reservoirs to Lower Basin contractors at a rate proportional to their water use would address this inequity and provide a well-founded basis for retaining roughly 0.8 MAF annually in storage at current reservoir elevations. We commend the Commissioner's August 16 announcement that notes a likely federal rulemaking to "address evaporation, seepage and other system losses in the Lower Basin" and urge that necessary environmental evaluation be undertaken as part of this EIS.	Natural Resources Defense Council; Natural Resources Defense Council	Ed Osann; Mark Gold
20357	3	WATMODEL - Water Management and Modeling	4. Account for water loss due to evaporation and seepage, especially in the lower basin.		Dylan Mori
20417	1	WATMODEL - Water Management and Modeling	As observed in the Notice of Intent, and as experience has shown, previous long-term decision-making did not include an adequate range of hydrologic scenarios	Western Resource Advocates	Bart Miller

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20417	16	WATMODEL - Water Management and Modeling	b. Adequate consideration of climate realities for operational certainty One of the primary goals of the 2007 Interim Guidelines was to provide operational certainty for the Basin states. But because the operational guidelines did not include a robust range of climate change and hydrological scenarios, the system almost crashed before the guidelines expire. The post-2026 guidelines need to provide operational certainty around all future scenarios so that the same mistake is not repeated. This includes operational certainty when the river's annual supply is as low as 11, 10, or even 9-million-acre feet (MAF). Reclamation's modeling efforts should be guided by relying on drier -- and more reflective of recent hydrology -- climate model runs. Additionally, drier hydrologies that are also plausible, for example, include millennium drought (2000-2020) and shorter time periods of significantly drier years (e.g., 2000-2004, 2020-2022). As was discussed on a recent Integrated Technical Education Workgroup meeting, Reclamation is moving in this direction with its DMDU (Decision-making Under Deep Uncertainty) and MORDM (Many Objective Robust Decision Making) approaches for analyzing multiple policy and hydrological scenarios. This will help considerably in understanding the ability for any post-2026 guidelines or strategies to "live within an 11 MAF river." Furthermore, a recognition of these potential drier hydrologies means not just considering what those lower flows mean in terms of reduced supply, but also how those hydrologies impact the overall environmental health of the river and the sustainability of the system.	Western Resource Advocates	Bart Miller
20465	2	WATMODEL - Water Management and Modeling	Improving users' certainty of receiving a specific quantity of supply as wells as lead times can be achieved by investing in improving forecasting and modeling in addition to changing specifics of reservoir operations criteria. We encourage Reclamation to aggressively assist the Colorado Basin River Forecast Center in improving its forecasts which are fundamental to reservoir operations. Specific actions include annually acquiring full coverage of aircraft- based snowpack monitoring above Lake Powell and supporting needed research on precipitation forecasting for the Center's water supply forecasts.	California Department of Water Resources	Karla Nemeth
20469	23	WATMODEL - Water Management and Modeling	Worst-case scenario In order to shift from a reactive mode when crises arrive to a proactive mode, this EIS must seek out the best available science and climate modeling to fully examine a "worst case scenario," including all of its ramifications, in order to develop an adaptive, transparent plan for addressing those dire conditions as nimbly as possible. We caution that environmental projections based on the last 30 years may not be sufficient to address the harsh realities of our low water future. Furthermore, having accurate data for evaporative losses from our reservoirs (which is a significant consumptive use in and of itself) is a necessity as part of this EIS, and must also factored in to water availability in our ever-warming climate. The necessity of including a worst case scenario underscores the pressing need for the EIS to be as adaptive as possible in order to be prepared for all future hydrologic conditions. Accordingly, should the BOR entertains a worst case alternative, then GCRG would suggest that it rely on hydrologic modeling of a greater than 20 percent reduction in flows and the inclusion of an operational option to release where outflow matches inflow. If anything, climate change has demonstrated that what once was 'reasonably foreseeable' is no longer the case. The historical flow data demonstrates that a 20 percent change in flows is not uncommon at all and therefore highly vulnerable to being inaccurate, especially coming on the heels of one of the best water years of the last two decades. Furthermore, relegating the operational floor to matching outflows to inflows minus losses diminishes what should be the most valid operational floor - establishing minimum base flows below Grand Canyon that match the inflows regardless of the losses. GCRG encourages BOR to examine a range of alternatives that considers up to 50 percent reduced flows and an operational floor that does not penalize downstream resources for Lake Powell's losses. This would better represent the reality of the situation and properly disclose to the public the results of BOR's actions. It could also disclose potential consequences that lead to a more thoughtful and effective planning process.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20473	2	WATMODEL - Water Management and Modeling	Along those same lines, system losses should be treated equitably. This has been a significant reason for the drawdown of the reservoirs, as system losses were not included in consumptive use calculations. By not counting system losses, certain recipients have not invested in improving their systems to reduce losses. If system losses were counted in allocations, system improvements would be sure to follow.	Irrigation & Electrical Districts Association of Arizona; Arizona Municipal Power Users Association; Grand Canyon State Electric Cooperative Association	Ed Gerak; Russell Smoldon; Dave Lock
20478	4	WATMODEL - Water Management and Modeling	Establishing a Realistic Water Supply The 2007 Interim Guidelines indicate (page 5 of the Record of Decision) through its associated Final Environmental Impact Statement that a "Normal Condition" exists when the Secretary determines that sufficient mainstream water is available to satisfy 7.5 million acre-feet (mat) of annual consumptive use in the Lower Basin Division states (Arizona, California, and Nevada) and a "Shortage Condition" exists when the Secretary determines that insufficient mainstream water is available to satisfy 7.5 maf of annual consumptive use in the Lower Basin Division states. It is understood that this volume is taken from the 1922 Compact; however, as experienced over the last 24 years of drought, this volume is not accurate. The realized "structural deficit" of water supply over this period warrants a new, more realistic foundation for normal water supply conditions in the 2026 Operational Guidelines. The new volume should be based on 100 plus years of recorded river hydrology, growth (realized and future) in both population served and agricultural uses, and influences such as the current drought.	Lake Havasu City	Cal Sheehy

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20478	6	WATMODEL - Water Management and Modeling	A cooperative effort between federal, state, and local users could be made to calculate the tolerance of all contract holders and affected customers to take deep reductions but not eliminate water delivery. It is recommended to conduct models at state and the federal levels to include results of the tolerance limit volumes to determine reaction of the river system hydrology and reservoir capacities. The outcomes of the modeling can help define required reductions with contract priority in mind. For example, the lower priority contracts can be reduced to their tolerance limit and then apply shortages to progressively higher priorities in some equivalent manner impacting all basin states.	Lake Havasu City	Cal Sheehy
20481	13	WATMODEL - Water Management and Modeling	We must continually improve our modeling framework by incorporating updated science regarding future inflows and demand projections in both the Upper Basin and the Lower Basin. Uncertainty about Upper Division water use makes it highly challenging to estimate depletions and flows and to quantify unmet demands. Upper Division States' diversions, return flows and depletions of Colorado River water must be accounted for to provide a foundational basis for the management of the contents in the Colorado River System.	State of Nevada; State of California; State of Arizona	John Entsminger; JB Hamby; Thomas Buschatzke
20489	39	WATMODEL - Water Management and Modeling	Modeling Considerations - Modeling is central to post-2026 Guidelines' development. Successful Guidelines will depend on the ability of the Colorado River modeling to adapt to a system in crisis by advancing updated modeling practices under deep uncertainty mechanisms. These mechanisms must go beyond narrowly avoiding system failure to proactively create water security so that both water users and ecological, spiritual, and cultural resources can thrive under increasingly unpredictable hydrologic futures. The post-2026 Guidelines must further be built on a modeling framework that avoids or disincentivizes efforts to take advantage of strategies and operations for the benefit of some at the expense of others.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	40	WATMODEL - Water Management and Modeling	i. Hydrology ensembles included in Colorado River modeling must address the full range of potential futures and sufficiently represent the compounding influence of climate change and aridification. Although climate modeling is inherently uncertain, we can be virtually certain that the Colorado River Basin will be substantially warmer, on average, over the 21st century than it has been to date. Hydrology ensembles used for Colorado River modeling must incorporate in some way the near-certain future trend of warming and drying in the Colorado River Basin. At minimum, this means it will be important that the CRSS and Decision-Making under Deep Uncertainty (DMDU) processes not only include hydrology ensembles that reach reasonably low flows with realistic multi-year patterns, but also enough traces within those ensembles that occur at reasonably low flows to provide an appropriate distribution.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	41	WATMODEL - Water Management and Modeling	ii. Post-2026 Guidelines and associated CRSS assumptions must provide a pathway for treating the Upper Basin storage system holistically. While Lake Powell is the largest of the Upper Basin reservoirs, over 20% of the total Upper Basin storage capacity lies in other reservoirs in the Colorado River Storage Project (CRSP) units. The Bureau will need to identify how it will consider Upper Basin storage in the post-2026 Guidelines development process. To this end, it may want to clarify how it will utilize CRSS rulesets and modeling frameworks to allow for operating these Upper Basin reservoirs as a fully integrated system and accounting for storage across all of them in long-term planning to provide a more accurate picture of total water availability. iii. Post-2026 Guidelines must be informed by CRSS demand schedules that: a. Consider the full range of Tribal demands (used and unused entitlements). There is general consensus within the Colorado River community that the management of the Colorado River system cannot be accomplished on the backs of the Tribal Nations. The Colorado River modeling, therefore, should explain how it will account for all entitlements to Tribal water or risk making the post-2026 guidelines Basin vulnerable to factors that are within our control to account for and plan accordingly. b. Represent accurate water depletion schedules. Methods used to estimate runoff/return/efficiency should also be clarified to ensure they account for the hotter, drier environment that the Basin is experiencing because of changing climate. The post-2026 Guidelines' planning process should also investigate ways of coupling anticipated demand schedules with hydrologic conditions. Rather than only developing scenarios for what will happen if demands do not adapt to available water, the Colorado River community should be looking toward characterizing what will be possible if they do. c. Account for non-consumptive use needs for priority natural resources. While future hydrology is largely out of our control, the Colorado River community still has the ability to make demand decisions, and, therefore, can plan for non-consumptive use for priority natural resources in the Basin. At present, a robust way of evaluating CRSS outputs that relate to environmental priorities below Lake Mead, or salinity dynamics at the US - Mexico border are lacking. We recommend the Bureau articulate how and to what extent environmental demand will be incorporated into Colorado River models, such that we can help refine these demands appropriately through additional comments. A demand cushion could be provided for non-consumptive priority natural resources for the system to not only survive, but ensure the environment is able to thrive.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	42	WATMODEL - Water Management and Modeling	iv. Short-term (annual) operational mechanisms must be updated to align with observed hydrology at logical points in the calendar year and informed by CRMMS modeling that accounts for climate change impacts. Post-2026 short-term operational mechanisms must also be advanced to operate effectively under a variable future dictated by climate change impacts. Before turning directly to operational forecasting, we recommend that the Bureau update short-term operational decision scheduling, (which is currently aligned with operational rules being set in August and adjusted as needed in April) to better inform monthly hydrologic forecasting and allow for more accurate and adaptive operational decisions.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	43	WATMODEL - Water Management and Modeling	v. Key CRSS output performance metrics and associated thresholds must be identified and regularly evaluated for environmental priorities to inform NEPA evaluations and operational and management strategies. Priority natural resources that capture a broad range of environmental values at locations throughout the Basin need to be incorporated into the performance and impact modeling for post-2026 Guidelines. Key performance indicators include identifying how much water is needed to meet target flow rates/volumes, and thresholds that specify how often identified indicators are met. Starting points for these thresholds are studies used to inform prior Records of Decisions in relevant regions of the Basin as well as the Colorado River Basin Water Supply and Demand Study, with updates to reflect more recent observations and advancements. While the resolutions of CRSS and CRMMS are not ideal for monitoring many specific environmental performance metrics, proxy metrics can stand in for priority resources and be regularly evaluated relative to appropriate thresholds either directly from model outputs, or through secondary models and analysis that incorporate CRSS or CRMMS outputs. Suggested metrics to include in the modeling are based on currently available CRSS outputs to account for environmental priorities according to region as follows: Upper Colorado * Monthly Peak/Base Flow Attainment (Locations: Green River near Greendale, UT; Green River near Jensen, UT; Green River at Green River, UT; Gunnison River near Grand Junction, CO; San Juan River near Bluff, UT; Colorado River near Cameo, CO; Yampa River near Maybell, CO; White River near Watson, UT; and Duchesne River near Randlett, UT. * Grand Canyon * Grand Canyon Flows * Lake Powell Storage * Annual Hydropower Generation Capacity Lower Colorado River Multi-Species Conservation Program (MSCP) * Reach Flows Below Hoover Dam * Lower Colorado River MSCP Habitat Site Water Deliveries Salton Sea * Salton Sea Inflows (Imperial Irrigation District delivery used to estimate inflows)	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	44	WATMODEL - Water Management and Modeling	Cienega de Santa Clara * Cienega de Santa Clara Water Deliveries (Wellton-Mohawk Irrigation and Drainage District deliveries) vi. Post-2026 modeling must consider a sufficiently comprehensive geographic area, relevant system functions, and range of impacts. As the Colorado River system is increasingly stressed, impacts are becoming more pronounced and localized. We already know reservoir management strategies can directly influence conditions throughout the Basin. However, recent years have also revealed that actions and conditions in various parts of the Basin can affect management of federal reservoir system. A NEPA analysis that informs useful operations going forward will strongly benefit from a modeling framework and metrics that: (a) extend the focus and analysis beyond storage conditions and static trigger levels at Lakes Powell and Mead; (b) extend beyond those developed for the Basin Study; and (c) consider the benefits and impacts of essential environmental resources. For example, parallel programs that help improve Basin conditions (i.e., restore watershed health, improve federal land management, protect Grand Canyon conditions) can enhance water availability, improve water quality and/or reduce risks associated with water-related disasters and climate change such as wildfire and drought. In so doing, they may also restore lost hydrologic function to watersheds and underlying groundwater resources for surrounding communities that could inform and affect overall operations within the Basin. The Bureau may want to consider how parallel actions could be integrated into the modeling platforms for the post-2026 NEPA analyses.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	45	WATMODEL - Water Management and Modeling	vii. Post-2026 Guidelines' modeling should integrate the ability to include additional rules for flexible management tools and systems as they come online. New mechanisms that allow the Colorado River community to manage water supplies more flexibly will be critical to enhancing water security in the Basin. Just as the Intentionally Created Surplus mechanism was built into reservoir management and system operations under the 2007 Interim Guidelines, so too should new and updated mechanisms to enhance flexibility throughout the Basin be incorporated into the NEPA analyses for post 2026 operations. From an ecological context, part of this flexibility will necessarily involve efforts to restore and maintain environmental values at levels that exceed bare minimums to protect endangered species or meet other mandatory limits; doing so will help ensure that these can provide helpful co-benefits for the region as well as absorb inevitable impacts from changes to water management in response to extreme conditions.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20490	2	WATMODEL - Water Management and Modeling	3. Consider Worst Case Scenarios - Modeling must incorporate a wider range of future hydrological variations and factors beyond the historic conditions, including multiple low runoff years that are substantially drier than in the recent past due to climate change, to ensure operational rules for the system will be sufficiently adaptive for those extremes.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	17	WATMODEL - Water Management and Modeling	Complicated interrelated dynamics and feedback loops suggest that Reclamation should consider and evaluate probable effects of 'worst case scenarios' because current Reclamation models may underestimate some of these interactions. For example, the best available science indicates that there are complex interactions between increased temperature and evaporation combined with proposed fallowing of more agricultural land that may dry soils to greater depths, reduce surface runoff, and increase erosion potential. Drier soils and increased erosion may exacerbate dust deposition on the annual snowpack, causing snow to melt sooner and faster than in the past and exposing more soil to drying (Warren et al. 1980, Painter et al. 2012). Wildfire ash has similar impacts as dust and is increasing with climate change and can modify and reduce runoff. Also, summer "heat dome" dynamics appear to be changing, with potential to drive increased water demand by municipal users and agriculture (Albano et al 2022) and evaporation (Bass et al, 2023). We recognize the excellent work that Reclamation's Boulder Climate Science staff is doing, and we encourage Reclamation to extend this research and modeling to consider and analyze issues like increased dust from drier-andfallowed lands (Kandakji et al 2020, Joshi 2021) and from the very large potential exposed shorelines around Lake Powell and Lake Mead if they are allowed to drop down to deadpool. Reclamation should evaluate the potential of this dust to contribute to rapid snowmelt, as well as other new climate dynamics and feedback loops that have been initiated by aridification, especially those that accelerate the process. If those dynamics cannot be explicitly modeled, then Reclamation should use a worst case that goes further than current climate models to account for these dynamics. We should be planning for drier climatic conditions and more hydrologic variability around the low end of past hydrologies in the Colorado River Basin and not just hope for a wetter and less variable future. The NPS believes this is the critical time to make the changes necessary for stability of operations in this increasingly dry environment and to prevent collapse of the water system for the Southwest.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	26	WATMODEL - Water Management and Modeling	Include complete measurement and quantification of reservoir evaporation at Lakes Powell, Mead, Mojave, and Havasu, and evaporation from flowing river segments throughout the Lower Basin and Utah. These data will be needed for full accounting of system losses, especially as mean temperatures continue to increase in the basin. While the NPS understands these data will likely not be available as alternatives are developed, we encourage Reclamation to incorporate the data into river and reservoir management decisions as it becomes available. Consider also including robust quantification of evapotranspiration from agricultural use in the Upper Basin.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	30	WATMODEL - Water Management and Modeling	When using calculations to determine releases from both Glen Canyon and Hoover Dams, use continuous functions rather than tiers (step functions) for annual releases so there are not dramatic changes on either side of a reservoir elevation tier.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	34	WATMODEL - Water Management and Modeling	Analysis and Modeling of Resource Impacts Reservoir operation alternatives will likely encompass annual release patterns that have potential to affect many river- and reservoir-dependent park resources. Effects of annual volumes on resources were addressed in the cumulative impacts section of the LTEMP EIS and were articulated in recent publications (Schmidt et al. 2023). We anticipate needing models to evaluate specific issues related to alternatives developed in the EIS, including (1) water quality, including temperature and dissolved oxygen, and drinking water-related parameters (2) native and federally-listed fish species populations, and non-native invasive fish species populations (including food base and habitat), (3) riparian vegetation response, including response of native and invasive species, and bank cover, (4) HFEs and other flow regime effects on river channel structure, geomorphology, and sediment dynamics, (5) effects of variable flow regimes on river recreation through Grand Canyon, and reservoir recreation in Lakes Powell and Mead, and (6) exposure of cultural and paleontological resources. The NPS offers to work closely with Reclamation as part of a technical group focused on developing and peer reviewing relevant models to evaluate impacts to resources. Models developed cooperatively between NPS, USGS/GCMRC and Reclamation would provide clear, quantitative results that could be used to compare the probable effects of each alternative. Staff at GCMRC are particularly knowledgeable about dam impacts and should be consulted closely throughout this process - from the development of screening tools to full resource impact modeling and the analysis and writing of the impact statement. Model outputs also could be used to guide alternatives development. One of the highest modeling priorities for the NPS is to evaluate the risk to humpback chub populations and the effects on non-native fish species populations as a function of flow regime, temperature, and water quality in Lake Powell in Glen Canyon NRA and the Colorado River in the Grand Canyon NP. This modeling should allow comparison between alternatives and provide anticipated trajectories of humpback chub and non-native fish species populations over time. Modeling should also illustrate the anticipated beneficial effects of potential mitigation activities (e.g., bypass cooling, flow spikes).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20497	2	WATMODEL - Water Management and Modeling	Modeling The models of available water for Reclamation to consider should distinguish between water over which Reclamation has authority (such as contract water) and other water in the Colorado River and Upper and Lower Basins. As described in the more detail below, the 16,000-acre feet of conserved Colorado River water provided under the Settlement Act is not subject to reduction by Reclamation through the post-2026 administrative process because it has been allocated by a Settlement, approved by Congress, signed by the Secretary of the Interior, and upheld in the United States District Court.	City of Escondido; Vista Irrigation District	Dana White; Jo MacKenzie
20624	2	WATMODEL - Water Management and Modeling	Evaporation losses in the system must be considered as a real consumptive use of water in the system. To ignore these losses is to sacrifice any real world credibility in your work.		Steve Munsell
20700	27	WATMODEL - Water Management and Modeling	2. Reclamation needs to develop methods for improving the accuracy of its 24-month forecasts of reservoir elevations. Wang et al. (2021) 14 conducted a comprehensive review of the accuracy of Reclamation's 24- month studies to determine how to improve them going forward and found that the studies overestimated inflows into Lake Powell and as a result often predicted reservoir elevations that were higher than what occurred in those years. In a warming and drying climate such overestimations lead to higher releases from Lake Powell and a false sense of security for water managers. We strongly recommend that Reclamation consider the findings of this study and incorporate its learnings into its development of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20700	32	WATMODEL - Water Management and Modeling	Kuhn and Jacobs also recommend "improved data related to groundwater use, storage, and recharge rates in the context of alternative scenarios of surface water availability in a changing climate is a critical science need for the Colorado River Basin." Id. at 65. We agree with Kuhn and Jacobs assessment that more research is vital to understanding the impacts of climate change on these groundwater inflows and the impact of those declines on surface flows in the Colorado River and its tributaries and believe that both western science and incorporating traditional knowledge from the basin tribes is also crucial to this effort. Reclamation should incorporate this analysis into development of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20700	37	WATMODEL - Water Management and Modeling	D. UNIFORMLY ASSESS AND ALLOCATE SYSTEM LOSSES. Account for and allocate seepage, evaporation, and other system losses to water users. The foundational accounting and allocation of losses from the Colorado River and its tributaries is one key element in balancing supply and demand in the Basin. Reclamation identified "assessing how to account for and allocate system losses due to evaporation, seepage and other losses" as an administrative priority in September 202223; however, it remains unclear the status of that analysis, how or if it will be integrated into or align with the development of the post-2026 guidelines, and if the basin states will be able to agree to the accounting system and allocations proposed. The evaporation study was not mentioned in the June 16, 2023 Notice in the Federal Register. More transparency, communication, and alignment regarding this ongoing action is needed from Reclamation. We believe this analysis is critical to development of the post-2026 guidelines and is directly within the scope of the EIS to be prepared.	Grand Canyon Trust	Jen Pelz
20700	38	WATMODEL - Water Management and Modeling	1. Seepage losses must be measured and allocated as upper basin deliveries. Seepage losses around Glen Canyon Dam contribute a significant amount of water to the Lower Basin, but are not measured, accounted for, or assessed as a delivery from the Upper Basin. Wang and Schmidt (2020) assessed seepage losses from Lake Powell finding "[a] significant amount of water seeps around Glen Canyon Dam and enters the Colorado River upstream from Lees Ferry."24 Based on water years 2005 to 2019, streamflow between Glen Canyon Dam and Lees Ferry is about 150,000 acre-feet per year. Id. This amount is about half of Nevada's total Colorado River allocation. Id. "This amount of seepage is significant, and is a transfer of water from the Upper Basin to the downstream river." Id. The authors recommend There should be renewed study of the magnitude of inflows to the Colorado River that occur between Glen Canyon Dam and Lees Ferry. Measurements since 2005 consistently indicate that flow increases between these two points, and the magnitude of this difference is of the same order as the annual consumptive uses of the state of Nevada. This study should include ground-water modelling of seepage around Glen Canyon Dam and independent analysis of the accuracy of measurements of Glen Canyon Dam releases and gaging at Lees Ferry. Id at 2 and 23. We agree that Reclamation should study and determine a method to account for and allocate the seepage amount as a water delivery from the Upper to the Lower Basin of the Colorado River. It is only fair that this amount of water entering the lower basin is accounted for as an upper basin delivery. The amount of water now entering the canyon as seepage (an additional unaccounted for and unallocated delivery) can now be stored in Lake Powell for later delivery downstream (e.g. ten years of seepage losses is about 1.5 million acre-feet of water).	Grand Canyon Trust	Jen Pelz
20700	39	WATMODEL - Water Management and Modeling	2. Evaporation losses are significant and must be fully accounted for and allocated. The amount of water lost to evaporation and other system losses is substantial. (Fleck and Kuhn at page 16.) "Depending on the level of storage, the loss of water is in the range of 1.5 - 2 million acre-feet per year, more than the annual consumptive use of four of the seven individual basin states.	Grand Canyon Trust	Jen Pelz

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20700	42	WATMODEL - Water Management and Modeling	"A consistent and accurate method of measuring and assessing reservoir evaporation" is needed and is "critical to future water management in the Basin." (Fleck and Kuhn 2023 at 16.) We agree with this assessment and encourage Reclamation to lead this effort to determine how to uniformly and accurately measure and report evaporation, seepage, and other system losses throughout the Basin. A Reclamation evaporation study needs to be completed and its methods affirmed by the other sovereigns in the basin (e.g. 30 basin tribes, Mexico, and the seven basin states) as soon as possible, but definitely before the Draft EIS for the post-2026 guidelines is released in 2024. Further, the Lower Basin States need to consider the best vehicle for permanently ensuring that these losses are accurately divided among existing water users in the lower basin and execute an agreement resolving this (and hopefully other) outstanding issues clouding the interpretation of the Colorado River Compact of 1922 and leading to continued disagreement between the states. The reprieve of 2023 is not likely to buy the basin more time to resolve these complicated and longstanding issues, so the time is now to come together and make the hard choices need to sustain the Colorado River and its tributaries long into the future.	Grand Canyon Trust	Jen Pelz
20738	15	WATMODEL - Water Management and Modeling	This also means that water used for environmental benefits in the Lower Basin should not be treated as evaporative or transmission losses, to the extent that responsibility for any such losses is allocated in the next management framework.	Quechan Indian Tribe	Jordan Joaquin
20817	5	WATMODEL - Water Management and Modeling	One way to achieve these reductions would be to address evaporation and system losses in the Lower Basin, which are currently estimated at 1.2 million acre-feet to 1.5 million acre-feet annually.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	8	WATMODEL - Water Management and Modeling	6. Be more responsive to actual hydrology at Lake Powell and Lake Mead.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20817	14	WATMODEL - Water Management and Modeling	They must also include accurate, transparent, and timely accounting of depletions.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20899	7	WATMODEL - Water Management and Modeling	1. Baseline Water Use For Analysis a. Baseline Must Include All Reserved Water Rights for Tribes and Reserved Water Rights For Federal Lands b. Baseline Should Not Include the Upper Basin Depletion Schedule -- only Perfected Rights 2. Future Estimated Water Flows and Water Availability Estimates Used for the Analysis Must Include Realistic Predictions in Light of Climate Change and Aridification including Increasing Losses to Evaporation from Storage The Upper Basin Hydrologic Determination must be modified to reflect the current 30- year average. Reclamation cannot continue to ignore the structural deficit and evaporative losses which will increase in the future. Reclamation must also analyze all relevant science, especially including worst case scenarios for aridification flow declines. Reclamation must develop plans and strategies to limit Upper Basin Water use rather than increase it.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	24	WATMODEL - Water Management and Modeling	6. Collaborate with the US Geological Survey6 and Surface Atmosphere Integrated Field Laboratory7 for base flow analyses and additional groundwater assessments, including flow modeling, resource monitoring, eDNA sampling, and isotopic data collection. 7. Build models predicated on non-stationarity weather patterns.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson

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20899	33	WATMODEL - Water Management and Modeling	Use of Colorado River Simulation System (CRSS) and Colorado River Mid- term Modeling System (CRMMS) for Modeling Must Look at a Broader Range of Assumptions and Inputs The modeling paradigm Reclamation is using may not be sufficient to address a changing future. In addition we suggest that other inputs and assumptions must be looked at and should be run through the models including a inputs that account for the structural deficit (seepage and evaporation) and assumptions that do not include new Upper Basin diversions under the depletion schedule. For modeling climate projections and creating scenario planning exercises, we suggest the following criteria for base flow and snow melt volumes at Lee's Ferry, Arizona (Compact Point). The framework should be vetted with the community of physical and social scientists who understand all the physical characteristics of the CRB. The baseline of supply data from 1906 to 2021, is not representative of the effects of anthropogenic warming. The current 30-year average is the only acceptable baseline for long-term planning. a. Modeling the natural flow in the 21st century 1. Scenario One (control): The current 30-year average of 9.6 million acre-feet (2021) for inflows into Lake Powell. 2. Scenario Two: The projected 30-year average in 2051. 3. Scenario Three: The projected 30-year average of 2081.9	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20904	6	WATMODEL - Water Management and Modeling	As part of this assessment, it is critical that the accuracy of historical natural river flow estimates be properly described. Historical natural flow numbers reported at Lee Ferry are estimated using a variety of means as opposed to being actual flow measurements. The quality of these estimates depends on measurement precision and bias, and the collective impact of these factors on total natural flow estimates should be described in the EIS. This is particularly critical to the extent that future flow predictions or scenarios are based on historical natural flow estimates. Glen Canyon Dam Operation		Craig Morgan; Mike Abatti; James Abatti
20912	7	WATMODEL - Water Management and Modeling	Regarding water accounting, we suggest the Bureau evaluate implementation of a July-June water year. This timing better suits Colorado River Basin agriculture production seasonality and crop planning needs.	Imperial Valley Water (IVH20)	Stephen Benson
20912	9	WATMODEL - Water Management and Modeling	We also ask the Bureau avoid consideration of misleading hydrology projections. "Effective" reservoir elevation is clearly double counting to facilitate manipulation of Junior water in dry years. The Imperial Valley, holders of Senior water rights, is effectively subsidizing urban economic expansion by holders of Junior water right. Also, while modeling addresses economic impacts, it fails to evaluate impacts on domestic food production, food supply and food prices. Modeling also doesn't address negative impacts, including economic impacts, air quality, loss of electric power generation and environmental degradation, to predominantly agricultural communities from conservation measures such as fallowing.	Imperial Valley Water (IVH20)	Stephen Benson
20913	4	WATMODEL - Water Management and Modeling	The hydrologic reality of the Colorado River, and the need to forecast for even lower flows The impacts of climate change on the Colorado River have been widely studied for decades, with almost every study indicating that warming temperatures in the basin have already and will continue to reduce runoff10. The question isn't whether or not this trend will continue, but by how much. With a wide range of future impacts, scientists have concluded that we have not yet seen the worst, with the potential to see an additional 40% of flow reductions by mid-century11. The impacts being experienced in the Colorado River are unlike anything that's been seen in this millennium, which is one of the reasons current modeling used by Reclamation, the Colorado River Mid-term Modeling System (CRMMS), informed by Colorado River Forecast Center, has proven to be overly optimistic for most of the past decade. A 2021 white paper The Futures of the Colorado Group evaluated Colorado River projections used by the Bureau and found that the agency has consistently underestimated the impacts of climate change and overestimated the amount of water projected to flow in the Colorado River, specifically into Lake Powell. As described in the Futures of the Colorado River Project's White Paper #712, Reclamation's 24-month studies have consistently overestimated runoff of the studies' 2nd year "most probable" projection. The study found that the Bureau's "most probable projected inflows were higher than what actually occurred by as much as ~7 million acre feet (maf) in some years, and predicted reservoir elevations were also higher than what occurred in some years." This is most aptly demonstrated by White Paper #7's Figure 7, which has been reproduced below as a single graph. [see attachment for graph] The above figure, showing levels of Lake Powell between December 2009 and June 2022, demonstrates how far Lake Powell water levels have declined over time, (shown in black). The red lines are Bureau of Reclamation 24 month "most probable" forecasts demonstrate a bias to overestimating the amount of water that will be in Lake Powell. Reproduced from White Paper #7, Figure 7. The use of the 30-year statistical modeling is historically the standard for water managers, but in the Colorado River Basin it has proven to be outdated and leaves water managers and stakeholders unprepared when a series of dry years reduces the volume of supply to the reservoirs. We believe Reclamation should incorporate a wider set of data, like those used and suggested by the Futures of the Colorado Group13 and Western Water Assessment14, in 24-month and 60-month projections.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	14	WATMODEL - Water Management and Modeling	The need to model alternative scenarios where Lake Powell operating at low or run-of-river levels, including environmental benefits and costs In addition to examining physical modifications at Glen Canyon Dam to allow water releases from low or run-of river levels, there is a need to use CRSS or similar modeling tools to test how the entire Colorado River system would operate under such scenarios. The primary method of modeling Colorado River reservoirs is the Colorado River Simulation System (CRSS) system, which by design, only models reservoir storage scenarios conceptualized under existing operating criteria of the 2007 Interim Guidelines, 2019 Drought Contingency Plans, and DROA operations. As stakeholders of the Basin develop operational strategies for Lake Powell and Lake Mead beyond 2026, it's imperative that Reclamation model a wide range of scenarios, including ones in which Lake Powell is at low or run-of-river levels.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	15	WATMODEL - Water Management and Modeling	The Futures of the Colorado Group has taken steps in this direction by modeling an array of scenarios44 outside the limitations of existing operating criteria, but even this selection of scenarios do not represent a wide enough range to explore every storage regime available on the Colorado River. Using the CRSS tool to model alternatives outside of the current reservoir operating criteria, White paper #6 models and analyzed several different scenarios including variations of prioritizing storage Lake Mead over Lake Powell and vice versa. These analyses were an important step in the right direction building the data around informed discussions of new alternatives, but they didn't go far enough, as they did not model the full drawdown of Lake Powell--a scenario which was once incomprehensible, but is now increasingly possible within a scale of years as a function of reduced snowpack and a consistent supply/demand deficit. The focus of White Paper #6 was stabilization of the broader system, not averting the impending problems at Glen Canyon Dam.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	17	WATMODEL - Water Management and Modeling	In order to have an informed discussion among Basin stakeholders, it's imperative to understand the benefits and tradeoffs of potentially phasing out Lake Powell entirely. As such, discussions around Post-2026 Operating Guidelines must utilize CRSS modeling of scenarios that includes Glen Canyon Dam being operated at levels below what the dam is physically capable of currently.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	12	WATMODEL - Water Management and Modeling	Account for and Manage Total Colorado River System Contents Accurate records of mainstream diversions, return flows, and consumptive uses in the Lower Basin are prepared, maintained and provided by Reclamation for the Lower Division States through the annual Colorado River Accounting and Water Use Report: Arizona, California and Nevada (Decree Accounting Report). While the Decree Accounting Report has maintained good records in the Lower Basin, accounting practices should be further evaluated to enhance accounting for irrigation efficiency practices and conservation agreements. Colorado River water use accounting in the Upper Division states is much more challenging, is not readily accessible and does not utilize uniform methods. Uncertainty about Upper Division water use makes it challenging to estimate depletions, flows and quantify unmet demands. Upper Division States' diversions, return flows and depletions of Colorado River water must be accounted for in a uniform manner for better management of the contents in the Colorado River System. Having a strong accounting basis for the Upper Division uses will also help to develop forecasts of Upper Division uses that are reflective of actual conditions and cognizant of climate change.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20919	15	WATMODEL - Water Management and Modeling	Analysis of Future Conditions Post-2026 Operations must be effective across a large range of water supply scenarios. Policies must be tested against a variety of hydrologic data sets, including those with extended and persistently dry conditions. The EIS process must consider hydrologic ensembles that represent drier conditions without dampening year-to-year variability and/or consider incorporating increases in year-to-year variability. This is a worthwhile endeavor to be able to test policies against increased variability of annual runoff in an overall drier future.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20923	4	WATMODEL - Water Management and Modeling	Hydrology, not reservoir levels, must drive post 2026 operations. Operating guidelines based upon comparative reservoir elevations which do not factor in real time hydrology have been proven to be disastrous for protecting storage in Lake Powell, and thus have failed to provide the water supply certainty for the Upper Basin intended by the Law of the River, including the 1968 Colorado River Basin Project Act (with specific reference to Section 602a). Post-2026 guidelines should be based primarily on near term water supply forecasts and real time basin hydrology.	Colorado River District	Peter Fleming
20923	5	WATMODEL - Water Management and Modeling	Operational Guidelines must address a wide range of hydrologic futures. Post-2026 guidelines must consider the potential reality of a river system that produces significantly less water and is more variable than anticipated by the 2007 IGs. Specifically, the guidelines should cover a larger range of potential futures which sets forth the operations of the river under a wide range of potential long-term average annual flows (e.g., between 9 million acre-feet and 17 million acre-feet) regardless of the observed historical period of record.	Colorado River District	Peter Fleming
20931	5	WATMODEL - Water Management and Modeling	Despite the sophisticated modeling tools available today, projecting actual future conditions with precision remains virtually impossible, especially over a period of multiple years or decades. The Districts recognize that modeling is a useful tool to help evaluate potential future risk, but urge Reclamation to temper expectations as to the predictive value of models for the post-2026 period with respect to determining any new mandatory reductions in the Post-2026 Guidelines.	Irrigation Districts Joint Letter: Central Arizona Irrigation and Drainage District, Maricopa-Stanfield IDD, New Magma IDD, Queen Creek ID, San Carlos IDD	Emily Brennan

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20932	6	WATMODEL - Water Management and Modeling	The Post-2026 Operations must: 6. Be more responsive to actual hydrology at Lake Powell and Lake Mead.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20932	10	WATMODEL - Water Management and Modeling	The Post-2026 Operations must incorporate the best available science and account for an appropriately wide range of hydrologic conditions, from the very dry to the very wet. While forecasting may be necessary in some situations, the Post-2026 Operations must primarily focus on responding to actual conditions and rebuilding and protecting storage at Lake Powell and Lake Mead. They must also include accurate, transparent, and timely accounting of depletions.	Upper Colorado River Commission; State of Wyoming; State of New Mexico; State of Colorado; State of Utah	Chuck Cullom; Brandon Gebhart; Estevan Lopez; Rebecca Mitchell; Gene Shawcroft
20933	1	WATMODEL - Water Management and Modeling	the Colorado River Simulation System (CRSS) and its sibling model, Colorado River Mid-term Modeling System (CRMMS), crucial mechanisms for basinwide and project-specific water management decisions regarding the river. Due to the importance that the output of this simulation system has on decision making processes, open sourcing the underlying code that comprises the CRSS and CRMMS, will achieve many important societal benefits. Public access to how the sausage of CRSS and CRMMS is made will foster increased understanding about the dynamics of the river system, provide fertile ground for educational and career advancement opportunities, and quicken the feedback loop of our institutions to implement improvements in the underlying models. Ideally, it would provide a template for other industries to follow to achieve a greater understanding of the power and impact information and algorithms have had on our lives and society... The CRSS and CRMSS could forge a path that ushers in a new era of transparency and understanding regarding these scientific and engineering tools.		Greg Bolla
20938	5	WATMODEL - Water Management and Modeling	Post-2026 Operations Must be Based Upon Actual Hydrology and Storage Release determinations under Post-2026 Criteria must be based upon actual hydrology and storage conditions at Lake Powell and Lake Mead. Operations under the 2007 Interim Guidelines and 2019 DCP rely on projected elevations based exclusively on forecasts performed six months in advance of operations; for January 1 operations, the forecast occurs the previous August, and for operations through September 30, the end of the Water Year in the Upper Basin, the forecast occurs the previous April. Experience under the 2007 Interim Guidelines illustrates that these forecasts consistently overestimate Lake Powell elevations and underestimate Lake Mead elevations, resulting in greater releases from Glen Canyon Dam to the detriment of the Upper Basin.	Colorado River Authority of Utah	Betsy Coleman
20940	2	WATMODEL - Water Management and Modeling	We should consider the over arcing theme for the post 2026 Operational Guidelines for Lake Powell and Lake Mead to be 'Live Within Our Means'! Climate change is our new reality and we only need to look at the last 20+ years of hydrology to confirm that. I believe that one of the most important things the Bureau of Reclamation can do is invest in the use of technology for forecasting our water supply. Most of our water comes from mountain winter snow pack and the use of LiDAR radar has greatly increased the accuracy of forecasting models. Additional data should be collected from throughout the upper basin states including actual soil moisture stations and increased stream gauging. This data will not only increase the accuracy of predicting our annual water supply, it will be very valuable in the future as we attempt to better understand the evolving challenge of climate change's influence on our water supply. It will also be important for the Bureau of Reclamation to lead the effort in coordinating agency databases, so that the data collected by the Departments of Interior and Agriculture will fit seamlessly into the forecasting models.		Ken Brenner
20945	11	WATMODEL - Water Management and Modeling	An important step to help meet those reductions may be to account for evaporation and system losses in the Lower Basin. This enables water users and managers in the Upper and the Lower Basin to know the amount of available water supply in a given year, and to adapt in such a way that in dry years, uses are reduced to reflect available water supplies and storage is preserved to the greatest extent possible in the event of multi-year drought.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20945	14	WATMODEL - Water Management and Modeling	Guidelines for Post-2026 Operations must rely upon the best available science, including actual hydrology and storage conditions at Lake Powell and Lake Mead, and the targeted use of short-term forecasting. The guidelines must include accurate, and transparent accounting for all depletions in the Colorado River System that are consistent with the Law of the River, issued annually, and rely upon the most recent studies including, but not limited to, the One Meter Topobathymetric Digital Elevation Model for Lake Powell, Arizona-Utah, 1947-2018.	Colorado Water Conservation Board, Department of Natural Resources	Rebecca Mitchell
20952	3	WATMODEL - Water Management and Modeling	* Ensure appropriate inputs are used in a climate-oriented, science-based model that recognizes both hydrological and atmospheric trends, includes tools to increase the accuracy in measuring system losses (e.g., evaporative and soil moisture losses), and estimates water supply availability as accurately as possible for an appropriately long period of time.	Environmental Protection Agency Region IX	Robin Truitt

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20952	12	WATMODEL - Water Management and Modeling	CLIMATE CHANGE As stated in the scoping notice, Reclamation acknowledges that unprecedented drought has changed our understanding of Basin hydrology and reliance on the historical hydrological record has limited value in forecasting the future. Climate science predicts increases in both temperature and the likelihood of prolonged periods of drought, potentially resulting in less water available to the system. The EPA agrees with Reclamation that future policies must be tested across a wide range of potential future conditions, including drought sequences that are longer and more severe than those that have been observed historically. Absent such an approach, operational policies are likely to be insufficiently robust, resilient, and adaptable. Modeled Scenarios For the Draft EIS, the EPA recommends that Reclamation simulate and present, as simply as possible, projected water budgets that account for water entering the system, water leaving the system (e.g., from consumptive use, trans-basin diversions, evaporation), and water moving through the system (stored in reservoirs or flowing in river reaches). While recognizing the inherent uncertainties associated with modeling future conditions, we recommend new or modified guidelines be applicable for the longest period of time possible to avoid emergency crisis responses that were not accounted for in the analysis. Because the past hydrologic record may not represent future water availability, the EPA recommends that the Draft EIS analyze a range of possible future conditions and identify how this information is, or will be, incorporated into overall hydrologic modeling5. Clearly identify the methodologies, assumptions, and model inputs used for the assessments and discuss the rationale for using each model. The EPA also recommends that Reclamation consider other climate-related input data such as increases in the fraction of precipitation falling as rain rather than snow, increased frequency of extreme weather events resulting in heavy precipitation and flooding, dust accumulation on snow, and changing soil moisture levels.	Environmental Protection Agency Region IX	Robin Truitt
20952	37	WATMODEL - Water Management and Modeling	We understand that Reclamation uses several models to simulate different components of operations, including the Colorado River Simulation System, a shortage allocation model, Intentionally Created Surplus, Generalized and Transmission Maximization Model, Colorado River Mid-term Modeling System.	Environmental Protection Agency Region IX	Robin Truitt
20955	3	WATMODEL - Water Management and Modeling	Management Tools Should Utilize the Best Available Science - Reclamation's modeling tools and processes must be updated to incorporate the best available climate science, and to remove biases from past, wetter hydrology. Estimates of what constitutes a "normal" supply need to be consistent with the new reality of the aridification in the Colorado River Basin.	Gilbert Arizona Public Works	Lauren Hixson
20963	10	WATMODEL - Water Management and Modeling	ii. Build a range of modeling scenarios, including projected annual flows at Lee's Ferry of 12.5MAFY and lower annual estimates. These modelling scenarios should integrate used and unused Tribal water rights in projecting future water demands.	Sonoran Institute; Sonoran Institute; Sonoran Institute	John Shepard; Richard Schaefer; Mike Zellner
20965	1	WATMODEL - Water Management and Modeling	In the NEPA review following this scoping process, Reclamation needs to consider current impacts of the existing water management policy on the Colorado River, including the Quantification Settlement Agreement (QSA) and the Drought Contingency Plan and the potential impacts of changes to water management policy. The review needs to note the effects of past actions and analyze the effects of possible alternative actions.	The EcoMedia Compass	Andrew McDonagh
20970	4	WATMODEL - Water Management and Modeling	And secondly, every effort should be made to: * allocate future percentage of water shares based on existing use and currently - not projected - stored quantities of water.		Jeanne Evenden

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20973	15	WATMODEL - Water Management and Modeling	Five Service National Wildlife Refuges (NWRs) are located within the likely action area of the EIS analysis; four are directly along the Colorado River (Havasu NWR, Bill Williams NWR, Cibola NWR, and Imperial NWR), and the fifth, Sonny Bono Salton Sea NWR, is connected to the Colorado River through water deliveries by the Imperial Irrigation District, the largest water user in California and the largest water right holder in the Lower Basin. Each NWR was established for a specific purpose and shall be managed to fulfill the purpose under the legal authority of the establishing statutes. Refuge management relies in part on water that passes through and that is diverted from the Colorado River and the four NWRs in Arizona serve as integral components of the LCR MSCP. These five NWRs are vital to the ecology of the region. These refuges provide breeding grounds for migratory birds and other wildlife, and the protection of natural resources and conservation of several federally listed species. The four river refuges are some of the only large tracts of natural terrestrial vegetation remaining on the lower Colorado River. For example, the Cibola Refuge was established as mitigation for the straightening, channelization, and armoring of the banks of the Colorado River and protects and recreates marshes, backwaters, and meanders that historically provided wintering grounds for migratory waterfowl and other wildlife that natural flooding would have formed. The water that is supplied by the Colorado River is foundational for the continued health of these habitats. The Service requests that the water modeling efforts extend through the refuge boundaries to determine management impacts throughout the system and to allow the refuge system to continue collaboration with Reclamation and provide input on potential impacts on these critical habitats. Specifically, the Service is requesting that the EIS provide analysis of: I. Inflow structure elevations and potential impacts to a refuge's ability to access water year-round from the Colorado River based on various planning scenarios as well as existing or needed gauging stations to accurately report water consumption and water returns. The Service can provide Reclamation with inflow structure elevations as well as seasonally when the refuges need to access water from the Colorado River per habitat unit in order to appropriately manage those units. 2. Ground water models that demonstrate how current, reduced, and anticipated water flows in the Colorado River may impact ground water levels at the river refuges and potential impacts to cottonwood and willow habitats. 3. Analysis of the probability of Tier 2 shortages for all proposed alternatives in the post- 2026 operational guidelines, and modeled impacts of these shortages on refuge properties.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20976	5	WATMODEL - Water Management and Modeling	Management Tools Should Utilize the Best Available Science Existing tools, like the 24-Month Study, should be evaluated as to their accuracy and usefulness. While the 24-Month Studies serve an important purpose, we cannot afford to rely on a tool that is simply good enough, when other methods of evaluating the likelihood of future reservoir levels and Powell releases may be more effective. Reclamation should also consider if scenarios such as the existing "Most Probable" and "Max Probable" obfuscate the likelihood of drier outcomes to Basin stakeholders.	Amwua One for Water	Warren Tenney
20976	6	WATMODEL - Water Management and Modeling	As part of managing the Colorado River system for increased reliability, estimates of what constitutes a "normal" supply need to be brought in line with the new reality of aridification occurring in the Basin. Additionally, Reclamation's modeling tools and processes must be updated to incorporate the best available climate science, and to remove biases from past, wetter hydrology. In acknowledgement of our nonstationary climate, less focus should be given to probabilistic forecasting, which can give an unrealistic depiction of future possible conditions. Marginal shortage reductions based on an optimistic annual supply that seek to only withstand cyclical drought conditions have not been and will not be sufficient to ensure a stable system. We need to be sure that any shortage reductions levied on water users are based on the best available science and are not only slowing the decline of reservoirs but are managing them at healthy and stable levels.	Amwua One for Water	Warren Tenney
20982	3	WATMODEL - Water Management and Modeling	Any decision point on annual operations considered in new operating guidelines and strategies should be based on actual (near real-time) hydrology and reservoir storage. The 2007 Interim Guidelines relied too heavily on the use of forecasts from the Bureau of Reclamation's 24-month study, which have proven to be both easily manipulated and at times inaccurate.	Southwestern Water Conservation District	Steve Wolff
20986	7	WATMODEL - Water Management and Modeling	Reclamation must use the best available science. The Post-2026 Operations must include realistic, transparent, and agreed-upon data in modeling and analyses, with a focus on consumptive uses and losses data, demand estimates, and observed hydrology. This will provide increased predictability for water users under a wide range of conditions, including varied hydrology. New Mexico also encourages Reclamation to use Decision Making under Deep Uncertainty ("DMDU") as a tool in its evaluation of Post-2026 Operations. DMDU could help plan for an uncertain future and better allocate resources. It could help us to anticipate and adapt to changing circumstances. New Mexico values the use of any tool that helps having a systematic approach to addressing unforeseen outcomes.	State of New Mexico; State of New Mexico	Dominique Work; Estevan Lopez
20989	11	WATMODEL - Water Management and Modeling	Current Modeling of Future Operations In the CRSS modeling tool, Upper Basin demands can be changed and shortened by hydrology, yet Lower Basin demands are set and shortened by policy driven by allocations. Accordingly, Lower Basin demands need to be also based on hydrology and overall basin watershed yield, and not policy or reservoir levels alone. Evaporation and transit losses need to be accounted for in the Lower Basin modeling and more specifically, counted as Lower Basin use. The UMUT commends the inclusion of potential impacts of warm driven declining streamflow is much need, as a way to include climate change into modeling.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart

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20989	14	WATMODEL - Water Management and Modeling	Calculate Losses Due to Evaporation, Seepage, and System Losses It is important that the true quantities of water used in the Lower Basin compared to the amounts delivered is fully understood so that we can have a comprehensive understanding of conservation in the Lower Basin, including mechanisms for reducing system losses where the losses are greatest. The Post- 2026 guidelines must account for and consider these losses when managing the Colorado River system to be effective and efficient.	Ute Mountain Ute Tribe; Ute Mountain Ute Tribe	Letisha Yazzie; Manuel Heart
20993	4	WATMODEL - Water Management and Modeling	1. Plan for a range of future hydrological and growth scenarios; the future operating principles should account for forecasted hydrology and growth, including snowpack monitoring and other weather forecasting technology, and soil moisture measurement, rather than relying exclusively on historical and current reservoir levels.	Yampa-White-Green Basin Roundtable	Alden Vanden Brink
21081	18	WATMODEL - Water Management and Modeling	Provide guidance for how to manage reservoir flow regimes (e.g., consider the amount of inflow and % outflow to mimic natural variability albeit reduced proportionally for diversions)	Dolores River Boating Advocates	Rica Fulton
21094	4	WATMODEL - Water Management and Modeling	One way to address a reduction in water use is to include an accounting for evaporation and system losses in the Lower Basin. This is a natural occurrence, and it should be accounted for. Another way to address the overuse of water is to limit water use to the actual hydrology that is provided instead of using creative accounting and exhausting the reservoir storage. The Upper Basin has to live with the hydrology, and the Lower Basin should also have to do so.	Southern Ute Indian Tribe	Melvin Baker
21124	6	WATMODEL - Water Management and Modeling	Currently there are differences between how evaporation is reported between the Upper Basin and Lower Basin reservoirs, and updated evaporation studies are either in progress or have been completed, but the results and data have not yet been made public and to our knowledge are not yet being used. We ask Reclamation to be more transparent and consistent with how evaporation is measured, reported, and used in the Consumptive Uses and Losses Reports, decree accounting reports, and system models--24-month study, the Colorado River Simulation System (CRSS), and the Mid-Term Operations Probabilistic Model (MTOM).	University of New Mexico; University of New Mexico	Katherine Tara; John Fleck
21155	2	WATMODEL - Water Management and Modeling	2. Require the Lower Basin to limit water use to match the annual hydrology of the river.		Dylan Mori
21155	4	WATMODEL - Water Management and Modeling	4. Consider evaporation and seepage as factors in water loss, especially in the lower basis.		Dylan Mori
21163	5	WATMODEL - Water Management and Modeling	4. Consider the amount of water that is lost to evaporation and seepage, especially in the Lower Basin. It is well known that evaporation and seepage are responsible for approximately 1.5 million acre feet of water loss every year, this loss needs to be accounted for in the post 2026 operational guidelines.		Madeline Cronin
21167	6	WATMODEL - Water Management and Modeling	4. Consider the amount of water that is lost to evaporation and seepage, especially in the Lower Basin. It is well known that evaporation and seepage are responsible for approximately 1.5 million acre feet of water loss every year, this loss needs to be accounted for in the post 2026 operational guidelines.		Teal Lehto
21288	2	WATMODEL - Water Management and Modeling	Existing tools, like the 24-Month Study, should be evaluated as to their accuracy and usefulness given the circumstances faced today in the Basin. While the 24-Month Studies serve an important purpose, we cannot afford to rely on a tool that is simply good enough when other methods of evaluating the likelihood of future reservoir levels and system releases may be more effective.	City of Goodyear	Barbara Chappell
21288	4	WATMODEL - Water Management and Modeling	Additionally, Reclamation's modeling tools and process must be updated to incorporate best available climate science, and to remove biases from past, wetter hydrology. In acknowledgement of our nonstationary climate, less focus should be given to probabilistic forecasting, which can give an unrealistic depiction of future possible conditions. Marginal shortage reductions based on an optimistic annual supply that seek to only withstand cyclical drought conditions have not been and will not be sufficient to ensure a stable system.	City of Goodyear	Barbara Chappell

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21302	14	WATMODEL - Water Management and Modeling	Hydrology. While the scope should include an analysis of the Colorado River Basin's likely future hydrology and the intersection of the proposed action and alternatives with this hydrology, these should also be analyzed in connection with the climate impacts analysis previously mentioned. This should include analysis of potential changes in precipitation and the influence of aridification on the timing and volume of runoff over time. The EIS analysis should include current assessments of and trends for flows into and out of Upper and Lower Basin reservoirs, snow, runoff, and precipitation, and tie this into the analysis of other climate impacts, particularly hydrologic decline related to aridification. With aridification, Colorado River flows are measurably declining as the temperature and evaporation in the Basin increases and the timing and volume of precipitation changes. It is estimated that for every 1 degree Celsius of warming, the Colorado River is losing 5-10 percent of flow through evaporation. Given global temperature trends, it is increasingly evident that the past hydrology of the Basin cannot be relied upon to predict the future, and that doing so would underestimate the risk of future dry conditions. The hydrology ensembles that are used should thus sample a sufficient number of plausible dry-end scenarios to ensure that the management of Colorado River water is robust to future dry conditions. These should also include temperature-adjusted scenarios that incorporate the continued warming signal in the Basin and that provide an alternative means of estimating warming-related impacts, avoiding the uncertainties associated with global climate models and downscaling-derived artifacts related to precipitation.	City of Phoenix	Cynthia Campbell
21302	33	WATMODEL - Water Management and Modeling	With aridification in the Basin, the data sets utilized in short-term forecasting and the data sets used in short-, mid-, and long-term system modeling should better reflect known aridification trends. Water forecasting for the Basin should include, at a minimum: Separation of unusually wet sequences or wet single years that may bias results. Development of hydrologies that include climate-driven temperature impacts in the Basin, such as temperature-adjusted versions of historical flows, in addition to use of flow data derived from global climate models (which currently do not downscale reliably at the resolution of the Colorado River Basin). Incorporation of aridification trends and temperature trends into hydrologic data sets, including typographies that account for potential landscape-level disturbances due to fire, vegetation changes, and other climate-related changes. Evaluation of system vulnerabilities to rapid changes in hydrologic conditions that may be possible in the future, including rapid swings in precipitation patterns (whether Basinwide or on a regional basis).	City of Phoenix	Cynthia Campbell
21302	34	WATMODEL - Water Management and Modeling	The Colorado River Simulation System (CRSS) and the Colorado River Mid-term Modeling System (CRMMS) models have known shortfalls that limit stakeholder understanding of the true impacts that could occur. To improve the models, Reclamation should consider: Incorporating, either directly or indirectly (via post-processing or the use of secondary models), the potential to model impacts on key resources that lie outside of the current scope of CRMMS or CRSS but that are likely to play a key role in the NEPA process or in development of future system management strategies, such as: o availability of water to particular mainstem users within the existing priority system, in order to evaluate impacts to particular end users, including tribes; o availability of water to contractors and subcontractors within the CAP system; o availability of water to key environmental resources that may drive management decisions; and o defining desired flexibility to manage water between reservoirs to meet required or desired management objectives (e.g ., Grand Canyon, below-reseNoir reaches subject to BiOps). More clearly incorporating, identifying, and displaying key Colorado River system limits and thresholds, including but not limited to: o likely real minimum power pools and changes in hydropower production, including secondary impacts from loss of hydropower; o Glen Canyon Dam bypass limits; and o CAP system minimum pumping/delivery limitations. Making CRSS/CRMMS model documentation, underlying assumptions, and input data sets readily available for access by advanced users.	City of Phoenix	Cynthia Campbell
1957	2	WATQUAL - Water quality	utilizing natural landscapes to minimize flood damage and purify and store water, and improving stream and river health.		Kimberly Hall
15597	2	WATQUAL - Water quality	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ These habitats also help slow runoff during storms and maintain water quality.		Robert Wernert
17241	17	WATQUAL - Water quality	Other resource impact analyses should include (but not be limited to): - Water quality;	National Audubon Society	Jennifer Pitt
20469	8	WATQUAL - Water quality	5. How can we best protect the health and long term viability of native fish populations in Grand Canyon, in particular the federally listed Humpback Chub, in the face of the recent invasion of predatory smallmouth bass, an alarming consequence of lower lake levels and rising water temperatures?	Grand Canyon River Guides, Inc.	Lynn Hamilton

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20469	21	WATQUAL - Water quality	Minimize non-native fish passthrough at Glen Canyon Dam In the Upper Basin, smallmouth bass are considered the greatest threat to native fish and have been linked to declines in the federally listed humpback chub. We now face one of the most serious consequences of our current and future low water situation in Lake Powell - an increase in smallmouth bass and other predatory nonnative fish passing through Glen Canyon Dam, along with warmer water temperatures sufficient for these species to reproduce. The establishment of these warm water non-native fish invaders could permanently shift Grand Canyon's aquatic ecosystem away from the fish assemblage typical of the last 50 years. (Schmidt, Yackulic and Kuhn, 2023). Due consideration must be made to keeping Lake Powell above the 3525' threshold to minimize passthrough and reduce warming of the river below Glen Canyon Dam. Please note that warmer water temperatures can also threaten the viability of the recreational rainbow trout fishery in the Glen Canyon reach. The profound negative effects of low reservoir conditions in Lake Powell and increased water temperatures on the future of Grand Canyon's fish populations cannot be overstated. All possible measures should be assessed immediately, including screens, barriers, and other physical means, as well as examining the efficacy of a temperature control device. From predatory invasive species, to low dissolved oxygen and warmer water temperatures, the potential threats and stressors abound to the fish community we currently have in Grand Canyon. Mitigating those threats by whatever manner(s) possible and with great expediency must be an important focus for this EIS.	Grand Canyon River Guides, Inc.	Lynn Hamilton
20489	16	WATQUAL - Water quality	The post-2026 NEPA analysis should identify whether the proposed action alternatives will affect salinity in the Lower Colorado River,	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20490	7	WATQUAL - Water quality	water quality effects in these two reservoirs;	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	8	WATQUAL - Water quality	effects to flows, water temperature, and threatened fish populations in the Grand Canyon	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	19	WATQUAL - Water quality	An issue of extreme importance to the NPS is predation on native endangered and threatened native fish species caused by increasing populations of invasive, warmwater, non-native fish species passing through Glen Canyon Dam (GCD) as a result of low-and-declining water levels in Lake Powell. Post-2026 operations will have direct impacts on this situation, with critical differences between alternatives. Of these warmwater non-native species, smallmouth bass is a particularly voracious predator that has significantly reduced populations of native and federally-listed fish species in the Upper Basin. If smallmouth bass and other high-risk, warmwater, non-native predators, such as green sunfish, establish permanent populations in sufficient numbers below GCD, this is very likely to seriously reduce populations of humpback chub and other native fish communities. Low water elevations in recent years have resulted in release of water through GCD at substantially higher temperatures than in the past. Observation and modeling have shown that both passthrough and reproduction increase in the river downstream of GCD when Lake Powell water levels are lower, particularly when levels fall below 3525' (though exact elevation will vary with the conditions of the year). These high temperatures are creating suitable habitat for accelerated reproduction of these high-risk, warmwater non-natives below GCD. In 2022 invasive species, including smallmouth bass, produced many offspring below GCD compelling the NPS and partners to initiate rapid response operations to lower their numbers.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20490	20	WATQUAL - Water quality	Over 90% of the humpback chub adult population in the world currently exists in the Grand Canyon and invasive predator species present a clear and present threat to the status of this federally-listed species (USFWS 2018; Van Haverbeke et al. 2022, 2023). The NPS recommends specific modeling to evaluate the range of risks to humpback chub populations, including minimum and maximum population size over time, effects of variations of flow, water temperature, water quality (e.g., dissolved oxygen and other characteristics), and habitat modeling. Modeling should consider the potential establishment of invasive species in Grand Canyon and in Glen Canyon below GCD. Modeling could also evaluate the effectiveness of potential mitigations, such as the bypass cooling and flow spikes that were developed under the GCD Smallmouth Bass Operations EIS. Modeling would allow robust comparison between alternatives and would be important for understanding and communicating the risk to humpback chub populations over time.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	35	WATQUAL - Water quality	Water Quality Concerns Water quality related to human contact/immersion and drinking water is also a concern at Lakes Powell and Mead. The NPS manages water-based recreation in both reservoirs and is concerned about harmful algal blooms, elevated bacterial levels, and the potential for increasing populations and varieties of harmful parasites and pathogens, including thermophilic amoeba (naegleria spp.), as water levels decrease. For example, several strains of E. coli have been shown to increase with increased water temperatures (Phillipsborn et al. 2016). The NPS recommends that Reclamation model and analyze potential changes in water quality that are expected to occur from various proposed alternatives. In another example, in 2022 the low water level in Lake Powell was linked to a plume of low dissolved oxygen concentration in Lake Mead. This suggests that the water quality in Lake Mead can be affected by conditions in Lake Powell and modeling and evaluation should acknowledge that linkage. We suggest that Reclamation meet with USGS/GCMRC researchers (Deemer, Mihalevich, Yackulic), Southern Nevada Water Authority staff, and NPS staff on this issue. At Lake Mead, NPS requests that Reclamation analyze the impacts of alternatives, particularly those that result in lower reservoir levels, on the potable water availability at major infrastructure areas including Callville Bay and Echo Bay. Lower water levels at Powell resulted in impacts to drinking water wells at several developed areas. All of these resource, recreation, water quality, and operational issues will be affected by Post-2026 operations. Accurate modeling of future water levels and water quality, socioeconomic impacts from declining water, and impacts to tourism will be critical will be critical towards reducing/minimizing significant impacts to NPs resources listed above.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20952	31	WATQUAL - Water quality	WATER QUALITY Removal of water from streams or storing large volumes of water in reservoirs can have substantial effects on water quality on those waters as well as downstream waters. Analyze any potential for the project to cause or contribute to exceedances of Water Quality Standards and/or increase pollution above allowable increments (i.e., excessive degradation of available assimilative capacity) within and downstream of the project area. Relevant WQS likely will include dissolved oxygen, temperature, pH, metals, nutrients, algal growth, bacterial concentrations, total suspended solids, total dissolved solids, turbidity and total dissolved organic carbon. If exceedances of WQS and/or significant reductions in assimilative capacity are possible, it is important that the Draft EIS characterize the spatial extent, magnitude, frequency, and duration of effects. A change in any of the WQS parameters caused by the alternative operations and fluctuating water levels may influence water quality, fisheries, or recreational use (including fish consumption advisories) within or downstream of the reservoirs. The EPA recommends characterizing the frequency and magnitude of water level fluctuations within the reservoir and analyzing the potential impacts associated with these fluctuations. Shoreline processes, including frequently changing reservoir levels that vary month to month and year to year, will provide a constant mechanism by which soil in the new area of inundation can be eroded into the reservoirs, contributing to suspended sediments and turbidity. To predict potential nutrient-related impacts, we recommend that any predictive reservoir water quality modeling ensures that the full variability and dynamics of growing season nutrient cycling, algal blooms, and reductions in dissolved oxygen are adequately represented. Since algal blooms and nutrient cycle dynamics significantly change within hours in any growing season day, a high frequency timestep is necessary to accurately predict any project-related impacts (e.g., algal blooms are in a < 12-hour timestep). Therefore, it is fundamental that the calculations use a high frequency timestep, account for dissolved oxygen concentrations throughout the water column, and consider daily minimums. Specifically, where a project alternative modifies flows through operational changes, increases the diversion of water, or introduces new water sources, the EPA recommends that the Draft EIS's water quality analysis: * Compare current water quality and projected post-2026 water quality against applicable NPDES or state water quality standards. * If the EIS identifies the potential for the selected alternative to cause or contribute to violations of water quality standards, identify mitigation or operational controls to avoid such impacts. If it proves difficult to determine the system's potential to exceed water quality standards, EPA recommends implementing a water quality monitoring program be performed before, during and after project implementation. * Account for changes in background water quality for water quality modeling and when making determinations of assimilative capacity. * Identify reaches with existing water quality impairments per State Clean Water Act Section 303(d) lists, draft or established total maximum daily loads (TMDLs), and potentially affected dischargers to ensure the project will avoid contributing to existing impairments. * Identify Source Water Protection areas and explain how the project would be consistent with Source Water Protection planning measures, including groundwater. * Identify potentially affected drinking water treatment providers with intakes on reaches with predicted water quality changes and describe the potential need to change treatment locations or processes. * Identify wastewater treatment plants discharging to reaches with predicted water quality changes. Evaluate current and post-project water quality at a critical flow condition and expected changes to assimilative capacity or permit limits for any NPDES or state discharge permits. * Discuss the negative impacts that proposed operational strategies, such as fluctuating reservoir levels, could have on water quality, and the benefits of sediment resuspension and transport on riparian and recreational resources. * Evaluate where agricultural irrigation in the project area is most likely to increase or decrease as a result of the selected alternative, describe the water quality effects related to return flows in receiving waters, and any associated impacts to water treatment facilities and discharge permittees. The EPA recommends providing details about mitigation for any anticipated water quality effects in the Draft EIS to the extent practicable.	Environmental Protection Agency Region IX	Robin Truitt
20965	9	WATQUAL - Water quality	The other concern is salinity rise. The draining of excess salt from farms into the Salton Sea is necessary for local agriculture, but all salts are retained in the terminal lake. The shrinking of the volume concentrates the salts, which in turn is now killing off fish and other macroscopic life in the Salton Sea with rapid salinity rise. Reduced irrigation flows of 250 KAFY will push salinity in the Salton Sea to complete aquatic ecosystem collapse within four years, and reach full salt saturation by 2045, see Chart 3 (see Reference 7 for calculations).	The EcoMedia Compass	Andrew McDonagh
20973	16	WATQUAL - Water quality	Refuge [USFWS National Wildlife Refuges] specific temperature analysis examining the likelihood of temperature increases with marsh and open waters in refuge units and how that may relate to issues with dissolved oxygen, algae blooms, non-native fish survival and recruitment, and changes in plant community make up or density.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20996	1	WATQUAL - Water quality	Drought conditions in the Colorado River basin have led to lower available run-off and lower reservoir elevation levels in many system reservoirs, including Lake Powell above Glen Canyon Dam. As reservoir water elevation drops, the Department has concerns regarding water quality released from the Dam. Elevated water temperatures and low dissolved oxygen levels pose a threat to a number of downstream resources, including the establishment of non-native species such as Smallmouth Bass (SMB) and impacts to native fish and the Rainbow Trout fishery at Lee's Ferry below Glen Canyon Dam.	Arizona Game and Fish Department	Luke Thompson

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20996	2	WATQUAL - Water quality	As the elevation of Lake Powell has been reduced, summer and fall water temperatures at Lees Ferry have increased. In 2022 as an example, the water temperature at Lees Ferry was observed above 20degC (68degF; August-October 2022), which is 4-5degC warmer than has been recorded prior to 2021. There have been discussions among stakeholders within the Glen Canyon Dam Adaptive Management Program (GCDAMP) regarding the increased risk of a SMB population establishing in the Colorado River downstream of Glen Canyon Dam and the potential impacts this establishment poses to native fish, including the Humpback Chub that was recently downlisted. Implementation of control efforts to remove SMB in the upper Colorado River basin has been initiated where high-risk non-native species are impacting conservation of native species. The costs of these control efforts are substantial. Preventative measures and changes to operations that can reduce the risk of establishment are critical to minimizing biological and economic impacts.	Arizona Game and Fish Department	Luke Thompson
20996	6	WATQUAL - Water quality	The forecasted water conditions in the Colorado River basin will create less favorable conditions for Rainbow Trout in coming years, with maximum release temperature projections reaching critical thermal tolerances for Rainbow Trout. Negative effects are expected from sub-lethal warm water, as recent models suggest that the food base at Lees Ferry cannot sustain adequate Rainbow Trout growth rates at these warmer temperatures. A negative response in fish condition is expected (J. Korman, Ecometric, pers. comm.).	Arizona Game and Fish Department	Luke Thompson
20996	7	WATQUAL - Water quality	In addition to warmer temperatures, low dissolved oxygen represents a risk to the Rainbow Trout fishery. Rainbow Trout are susceptible to increased stress, disease, and death when dissolved oxygen levels dip below 5 ppm. High runoff events have been shown to lead to low dissolved oxygen plumes developing and traveling through Lake Powell, and lower reservoir elevations suggest that these plumes are more likely to come through the Glen Canyon Dam due to their relation to the penstocks. Low dissolved oxygen poses a threat to fish populations below the dam, particularly the first five miles, which represents the most productive sections of the Lees Ferry fishery.	Arizona Game and Fish Department	Luke Thompson
20996	8	WATQUAL - Water quality	Recent modeling done on the response of Rainbow Trout to warmer temperatures at Lees Ferry suggests that it is highly probable that another fishery collapse is imminent. The fishery took many years to recover after each of the previous collapses and the current status of the fishery suggests that the next recovery could take longer. Success of a healthy high-quality recreational Rainbow Trout fishery in GCNRA requires maintaining release temperatures <16 degC.	Arizona Game and Fish Department	Luke Thompson
20996	9	WATQUAL - Water quality	Although 16-18degC is within the range of preferred temperatures for Rainbow Trout, recent analysis presented to the Technical Working Group of the GCDAMP suggests that an increase in basal trout metabolism resulting from the elevated temperature combined with the poor trout food base that exists at Lees Ferry will stress and starve trout (J. Korman, Ecometric, pers. comm.). The Department is concerned that temperatures in Lees Ferry could exceed those that could sustain any population of Rainbow Trout, let alone meeting the LTEMP goal of a high quality recreational Rainbow Trout fishery. Therefore, the Department recommends that Reclamation implement structural modifications to Glen Canyon Dam that allow for release of cooler water when the reservoir is at lower water surface elevations.	Arizona Game and Fish Department	Luke Thompson
20996	10	WATQUAL - Water quality	Changes in other water quality parameters such as salinity and total dissolved solids and how these parameters can be influenced by reservoir management are less understood; however, the Department is concerned with increases to these metrics and negative effects to biota, both in reservoirs and in the Colorado River below Glen Canyon Dam. Additionally, the influence of soluble reactive Phosphorus on productivity in the system is just beginning to be quantified, but appears to be strongly correlated (Yard et al. 2023). The Department recommends BOR consider the changes in water quality and incorporate strategies to maintain water quality into long term planning at Lake Mead and Lake Powell.	Arizona Game and Fish Department	Luke Thompson
21038	4	WATQUAL - Water quality	Changes to Colorado River management may change salinity of Colorado River water between Hoover Dam and the Northerly International Boundary. Salinity changes may be caused by reduced irrigation uses of Colorado River water that create return flows to the river, or by reduced releases from Lake Mead. Changes to the salinity of Colorado River water will change Reclamation's management of Colorado River water deliveries to Mexico, with possible implications for water quality as well as timing.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21038	7	WATQUAL - Water quality	We recommend that Reclamation identify how action alternatives may change salinity in the Colorado River and how changed salinity may impact deliveries to Mexico. Impacts assessed should include the ability of the United States to comply with Minute 242, Reclamation's ability to use Yuma-area pumped return flows as a component of delivery to Mexico, Reclamation's ability to deliver water to Mexico at the rates and times requested (a key area of binational cooperation identified in Minute 323), implications for the volume of water Reclamation must release from Lake Mead for Mexico's delivery. Each of these potential impacts is of paramount importance to the Republic of Mexico and its Colorado River water users, and we suggest that a thorough assessment of impacts is important to ensure the United States and Mexico can continue to work collaboratively, with shared information, to maintain the benefits achieved under the terms of recent binational Colorado River agreements.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas

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21066	8	WATQUAL - Water quality	Here are some good reasons for keeping a sustainable water level in Lake Powell: * Prevent Powell's level from dropping too low, putting it at risk for algae blooms.		Tiffany Mapel
21169	7	WATQUAL - Water quality	5. Increases in groundwater use will cause changes in groundwater gradients. Changes in groundwater gradients in the vicinity of uranium mines on the Coconino Plateau have the potential to change to create pathways, that otherwise would not exist, for potentially released uranium to migrate into Tribal groundwater resources. The potential threat of uranium releases to Tribal groundwater resources is of great concern to the Tribe. The DEIS must evaluate this potential impacts.	Havasupai Tribe	Thomas Siyuja
21302	18	WATQUAL - Water quality	Water Quality. The scope of analysis should include the implications of actions or inactions that create water quality issues, including potential future changes as a result of climate impacts. This includes sedimentation and reduced water quality as a result of watershed conditions, erosion, and/or wildfires, with attendant impacts on reservoir storage. It includes changes in salinity from agricultural activities and in response to shortage conditions. It also should include water quality impacts of reservoir releases, for example releases from Alamo Dam on Central Arizona Project's water supply.	City of Phoenix	Cynthia Campbell
519	2	WATQUANT - Water quantity	Once the lake gets to the target elevation, because of the numerous variables it should remain at that level.		Toni McKay
547	1	WATQUANT - Water quantity	Please keep lake Powell full with more water!		Jesslin Ence
10547	1	WATQUANT - Water quantity	Let us safeguard and protect these unique wetlands.		Rachael Denny
11809	1	WATQUANT - Water quantity	To protect the riverâ€™s reservoir levels and flows, I support reducing water usage rigorously. But, please, letâ€™s also make sure the habitat for birds and other wildlife remains safe.		Ken Kurtz
15597	1	WATQUANT - Water quantity	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ These habitats also help slow runoff during storms		Robert Wernert
17241	34	WATQUANT - Water quantity	Evaluate and communicate available reservoir water supplies - Each of Reclamation's Colorado River reservoirs has a total supply - the total volume of water in the reservoir - and an available supply - the volume of water that a reservoir can deliver downstream in consideration of "dead pool." Reclamation routinely reports on the total supply (as a percentage of full capacity) at its Colorado River reservoirs and does not routinely report on available supply. In 2022 Reclamation highlighted this discrepancy while making the emergency decision to reduce the volume of water to be released from Lake Powell. All of Reclamation's analyses, as well as all public communications about Colorado River reservoirs, should clearly communicate the available supply.	National Audubon Society	Jennifer Pitt
20341	22	WATQUANT - Water quantity	* Evaluation of alternatives that adequately assesses the severe impacts on communities that have no alternative source of water, like Imperial Valley.	Imperial Irrigation District	Shields, Tina L
20489	5	WATQUANT - Water quantity	i. The post-2026 Guidelines should consider and address a broad range of environmental impacts from the scenarios and actions contemplated with the goal, wherever possible, of supporting the preservation and restoration of ecosystems that contribute to water resilience in the Basin, including, but not limited, sensitive species and habitats, and ecosystems in the Grand Canyon and Colorado River Delta.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	19	WATQUANT - Water quantity	vi. Stability of interconnected systems. The Colorado River system cannot effectively operate to stabilize conditions at the expense of other watersheds going forward. Additionally, understanding the demands and constraints of adjacent watersheds/systems could directly or indirectly impact supplies (i.e., transmountain or transbasin diversions) and inform the stability of the Colorado River Basin going forward. As basin stakeholders work to implement river policies and management decisions that will sustain the system over the long-term, it will be important to consider and avoid harm to systems that are interconnected and/or dependent on, but separate from, the consideration of the annual water supplies within the Colorado River Basin. Such interconnected systems, include: (a) groundwater supplies; and (b) transbasin connections like the San Juan Chama/Rio Grande; Colorado River/South Platte/Arkansas to name a few.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice

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20489	21	WATQUANT - Water quantity	iii. Grand Canyon Resources. The post-2026 NEPA analysis must identify the impacts of potential changed releases from Glen Canyon Dam on Grand Canyon resources to fully inform decision makers and the interested public of the possible consequences of a proposed action. Specifically, the NEPA analyses need to go beyond mentioning how annual release volumes will be managed consistent with the Long-Term Experimental Management Plan (LTEMP) "to the extent possible," and identify what will happen to resources if the LTEMP cannot function as contemplated under the 2016 LTEMP EIS. As part of this process, the Bureau should address: (1) How the NEPA analyses will itemize the cumulative effects that any proposed changes to Glen Canyon Dam releases have on Grand Canyon resources to inform decision makers and the public; (2) Whether additional actions will be incorporated into the post-2026 Guidelines to fill the void between when regular LTEMP operations can occur and when the proposed timing and volume of releases from Glen Canyon Dam under the proposed action alternatives fall outside the modeling used to inform the LTEMP Record of Decision; or (3) Whether the LTEMP itself will be updated through a separate process to fold the post-2026 framework for changed annual releases at Glen Canyon Dam into the LTEMP process consistent with the Grand Canyon Protection Act. Ongoing experimental and management efforts pursued by the Glen Canyon Adaptive Management Program due to low flow and storage conditions also need to be factored into but not delayed by the post-2026 NEPA process. These efforts, which may result in cumulative impacts relevant to the environmental impact statement, currently include evaluation of adjustments to triggering windows for High Flow Experiments as well as investigation of appropriate measures to minimize small mouth bass entrainment below Glen Canyon Dam.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20489	35	WATQUANT - Water quantity	c. Groundwater storage - As the availability of Colorado River decreases, there is increased reliance on groundwaters supplies, which in turn affects baseflows to the river. Thus, depletion and mining of groundwater is not a sustainable solution for the Basin. Impacts of NEPA alternatives on groundwater supplies will remain a critical part of the overall analysis for developing workable strategies and operations for the Basin.	National Audubon Society; Western Resource Advocates; Colorado River Sustainability Campaign; The Nature Conservancy; Environmental Defense Fund; Theodore Roosevelt Conservation Partnership; Trout Unlimited, Angler Conservation Program; American Rivers	Jennifer Pitt; Bart Miller; Karen Kwon; Taylor Hawes; Kevin Moran; Alex Funk; Sara Porterfield; Matt Rice
20700	18	WATQUANT - Water quantity	4. The health of the Grand Canyon and its affiliated tribal communities are inextricably linked to the operational decisions and annual volumes of water that will be determined as a part of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20700	29	WATQUANT - Water quantity	C. PROTECT GROUNDWATER. Evaluate and address how surface water shortages stress groundwater resources in the Lower Colorado River Basin and create or incentivize policies to protect groundwater resources basin-wide. Groundwater is a significant source of water in the Colorado River Basin.16 It contributes to surface flows in the Colorado River and its tributaries through baseflows and enters rivers through springs and seeps.17 As surface water supplies are reduced, water users will shift their use to groundwater, especially where regulations are not in place to ensure conjunctive (or joint) management of surface and groundwater resources.18 The Secretary of the Interior, and its bureaus and offices, are uniquely situated to play an important role in incentivizing and acknowledging the connection between groundwater and surface water throughout the basin and should show strong leadership on this issue.	Grand Canyon Trust	Jen Pelz
20700	30	WATQUANT - Water quantity	1. Reclamation must take a holistic view of the basin and account for and protect groundwater and baseflow contributions to the Colorado River.	Grand Canyon Trust	Jen Pelz
20700	31	WATQUANT - Water quantity	b. Significant groundwater contributions to the Colorado River within the Grand Canyon need to be understood and protected from depletion. The Colorado River downstream of Lees Ferry receives significant intervening flows from tributary streams as well as from large springs within the Grand Canyon that contribute to ground and surface water in the region	Grand Canyon Trust	Jen Pelz
20700	33	WATQUANT - Water quantity	Further, Reclamation and other basin partners should make every effort to ensure that these flows are protected from unregulated groundwater pumping for development in and around the Grand Canyon in Arizona. Groundwater withdrawals in this area threaten flows into the Colorado River, the Grand Canyon ecosystem, and the water source as well as cultural and spiritual interests of tribes. As water supplies dwindle, Reclamation needs to account for and consider valuable every drop of water in the basin including that from groundwater sources and advocate for its protection.	Grand Canyon Trust	Jen Pelz
20700	34	WATQUANT - Water quantity	c. Reclamation can no longer ignore the vital role of groundwater in supporting flows in the Colorado River and its tributaries and must ensure it is protected basin wide.	Grand Canyon Trust	Jen Pelz

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20700	35	WATQUANT - Water quantity	As a part of the development of the post-2026 guidelines, Reclamation needs to consider the impact of any surface water use reductions on groundwater resources within the basin. Reclamation needs to devise a method for understanding these effects on communities, the availability of groundwater, and the environment. Further, on the flip side, Reclamation needs to ensure that water users are not getting two bites at the same apple by taking water out of the Colorado River and its tributaries through wells and outside of the surface water allocation system. This is especially important when states and water users are making substantial cuts to their surface water supplies to benefit the entire system. For example, if an unregulated groundwater well in Arizona were to pump groundwater that is connected hydrologically to the Colorado River (groundwater that would eventually end up in the river), that would be a depletion to the Colorado River that is unaccounted for as a part of Arizona's allocation. If the well is located upstream of Lake Mead (e.g. adjacent to the Grand Canyon) that water user would be taking part of Arizona's allocation before that allocation was made based on the post-2026 guidelines. Thus, Arizona would be using its allocation plus this unregulated use of groundwater that is hydrologically connected to the Colorado River and its tributaries. This hypothetical illustrates the concept that it is hard to conserve water if the bucket has a hole in it. Arizona's lack of groundwater regulation is a giant hole in the bucket of the Colorado River Basin that given the challenging hydrology can no longer be ignored.	Grand Canyon Trust	Jen Pelz
20700	36	WATQUANT - Water quantity	In summary, the Secretary, unlike the individual states, has the ability to 1) view the watershed holistically and weigh the impacts of specific state policies on the basin as a whole, 2) mobilize its bureaus and offices to develop scientific resources to better understand the interaction between groundwater and surface water in the basin, and 3) engage to protect groundwater throughout the basin especially where it is hydrologically connected to the Colorado River and its tributaries. We strongly recommend the Secretary step into this role and prioritize and incorporate considerations of and protections for groundwater resources into the scope and objectives of the post-2026 guidelines.	Grand Canyon Trust	Jen Pelz
20913	5	WATQUANT - Water quantity	The likelihood of future declines at Lake Powell Climate change has already reduced the Colorado River's average annual flow roughly 20% over the past two decades, compared to the 20th Century average, resulting in dramatic water level declines at Lake Powell. [see attachment for table] The table above summarizes the range of Colorado River flow declines projected by multiple peer-reviewed scientific papers. This material is reproduced from A Future on Borrowed Time16, an analysis of Upper Colorado River Basin water budgets. Flow declines are shown as a percent decrease from the 20th Century Average of 15.2 million acre-feet, and both the 20th and 21st Century. Under a 40% decrease, the flow of the river is a mere 9.1 million acre-feet. In 2022, Reclamation took drastic steps to increase the elevation of Lake Powell, by releasing an additional 500,000 acre feet of water from Flaming Gorge Reservoir and holding back 480,000 acre feet of water from being released to Lake Mead downstream17. Even with these efforts, Reclamation projected that, under its most probable scenario, Lake Powell's elevation could drop to approximately 3,508 fasl by April 2023, 14 feet lower than the reservoir's 2022 low point18. With the combined results of increased upstream dam releases, reduced downstream releases, and a 2023 snowpack that was 170% of average, the low reservoir level outcome was narrowly averted. But crucially It's important to take stock of how close Lake Powell came to hitting minimum power pool. [see attachment for graph] The figure above, from Wheeler et al. in Science19, shows an array of future possibilities of combined storage totals between Powell and Mead, based on existing shortage curtailment schedules and different Upper Basin depletion (demand/use) scenarios. The figure shows that with climate impacts not getting worse, and significant reductions implemented from the Upper and Lower Basin, system storage will still only stabilize, not increase. Based on the Wheeler et al. projections, if Basin states cannot come to an agreement on widespread reductions of consumptive use and/or climate continues to reduce runoff, storage at Powell and Mead will drop precipitously in the near future. As stated earlier, climate science predicts that runoff will get worse. Whether Basin states can agree to widespread cuts remains to be seen. The recent agreement reached by California and Arizona was a step in the right direction, but relies on extensive federal funding--a model that likely won't be sustainable in the future20.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	6	WATQUANT - Water quantity	For another perspective of what the reservoir's future could look like and provide another possible prediction of what could happen in the years ahead, the analysis conducted by Utah Rivers Council, Glen Canyon Institute, and the Great Basin Water Network21 projected potential future Lake Powell water levels by simply using observed historical data. Two historical five-year periods were chosen and examined what Lake Powell's water level would be if future conditions resembled those observed in either of these periods22 The figure below shows the entire history of Lake Powell's water levels and illustrates the two color-coded periods used by the report to project future Lake Powell levels, from 2000-2004 and from 2017-2021. [graph] Historic elevations of Lake Powell and the two historic periods chosen to forecast possible future declines [graph] Summary statistics for two historical time periods used in analysis. These two periods were chosen because they represent good 'new normal' and 'low end' projections for the Colorado River System. The 2000-04 period roughly conforms with the low-end projection of a 40% decline in Colorado River flows predicted by the current scientific literature23. The 2017-21 is similar to the 21st century average Colorado River flow of 12.3 million acre-feet and could be thought of as the recent new normal. The figure below shows Lake Powell's projected elevation level using these two historical periods. It must be noted that these projections do not include the historic water year of 2023. However, they are still relevant, especially when considering the 2017-2021 projection window. In 2017, Lake Powell experienced an increase of 4.3 million acre feet in storage volume, an almost exact match of storage in 2023. (See graph below). USBR graph with overlay text by Glen Canyon Institute The study forecasted into the future using the two historic periods of 2000-2004 and 2017-2021, and projected that Lake Powell quickly drops to levels well below the critical elevation thresholds of 3,440 and 3,430 feet above sea level. This exercise was not meant to be a prediction that Lake Powell will follow either of these paths over this time frame. Projecting Lake Powell's future water levels with a high degree of certainty is very difficult, especially without incorporating potential future curtailments. This exercise demonstrates it is very possible that Lake Powell could drop to critical elevation thresholds in the near future. [graph] Projected elevation of Lake Powell reservoir levels into the future from WY 2022 forward, given observed historical hydrologic periods of both 2000-2004 and 2017-2021.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20913	13	WATQUANT - Water quantity	Should Lake Powell water levels drop down toward deadpool, the maximum water flow release capacity out of Glen Canyon Dam drops from 15,000 cfs to below 5,000 cfs. The reduction in water release capacity could have adverse effects on the Grand Canyon ecosystem. Below elevation 3,440 ft, downstream releases would likely need to be maximized to get water to the Lower Basin, meaning flows in the Grand Canyon could be constant over long periods of time--a flow scenario that would be damaging to the Grand Canyon's ecosystem and beaches. These reduced flow capacities would limit the ability to conduct High Flow Experiments downstream and aggravate restoration efforts to improve sediment deficits in Grand Canyon National Park. Under these flow conditions, the fate of the Grand Canyon's ecosystem would be in jeopardy, and would likely violate key provisions of the Grand Canyon Protection Act43.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20919	11	WATQUANT - Water quantity	Engineering Fixes Reliable and robust storage infrastructure is a necessary aspect of a healthy system that supplies water to over 40 million people. Recently, the Department of the Interior took actions to adjust operations at Glen Canyon Dam to reduce risks to infrastructure that may arise from decreasing elevations. A comprehensive review of Glen Canyon Dam and improvements that can be made to enhance its operational capacity must be undertaken to avoid such reactive actions, and to ensure that water can safely pass through the dam at low elevations.	Central Arizona Project; Central Arizona Water Conservation District	Greg Adams; Brenda Burman
20952	32	WATQUANT - Water quantity	Groundwater The EPA anticipates that new guidelines and operations could potentially impact groundwater resources that are interconnected and/or dependent upon the Colorado River in both positive and negative ways. In assessing the potential impacts of each alternative on connected groundwater systems in the project area, the EPA recommends that the Draft EIS examine the potential for changes in the volume, storage, flow, and quality of groundwater using available characterization of groundwater resources and groundwater use. If project operations could potentially result in any adverse impacts to groundwater resources, we recommend considering alternatives, mitigation measures or operational controls that would avoid, reduce, or minimize impacts on groundwater.	Environmental Protection Agency Region IX	Robin Truitt

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20965	3	WATQUANT - Water quantity	Reduced downstream deliveries due to current and anticipated reservoir and hydrologic conditions on the Colorado River present significant and damaging risks to the public and ecological health of the Salton Sea region. The Department of Interiors past stance that Colorado River cuts do not impact the Salton Sea is outdated and not shared by Salton Sea stakeholders, most notably, the public. The EIS for post 2026 Colorado River operations must include a full assessment of all impacts to the Salton Sea Region. For thousands of years water in the current Salton Sea basin was directly hydrologically connected. Flood flows on the Colorado River would redirect southward flow through present day Mexico, to the north to fill the basin creating Ancient Lake Cahuilla, which was a body of water vastly larger than the Salton Sea of today that reached north to Indio and overflowed south of present-day Mexicali to the Sea of Cortez. Ancient Lake Cahuilla filled and dried many times over recent millennia with River course changes from natural flooding. The most recent filling of the Salton Sea basin in 1905/1906 was the result of flooding that washed out levees weakened by ill timed cuts meant to wash out sediment. Yet again the Colorado River flowed north to partly refill the Salton Sea basin until many tons of rock cut and transported by the Sothern Pacific Railroad filled the breaches. The system of dams built on the Colorado River in the early 20th Century now prevent the natural flooding that occurred in prior centuries. Now the hydrological connection of the Colorado River to the Salton Sea is less direct, but still there is a connection. As envisioned by land and water developers in the late 19th century and early 20th century, Colorado River water flows to farms, businesses, and municipalities in the Imperial and Coachella Valley, then drains to the Salton Sea as agricultural, industrial, and municipal wastewater. The Salton Sea depends on the Colorado River for its continued existence as a natural resource. Irrigation runoff from farms in the Valleys has kept the lake sustained for over a century. Since water transfers from agricultural regions to urban areas began in the 1980s, but most significantly under the 2003 Quantification Settlement Agreement, the Salton Sea, its surrounding communities, ecosystem and wildlife are suffering devastating consequences of reduced inflows to the lake. Now water users in the Salton Sea basin are being asked to cut additional deliveries to farms and implement conservation efficiency and fallowing to generate enough storage to protect reservoir elevations. These cuts are unlikely to end after 2026. While the direct results of significant water conservation efforts will have a beneficial outcome by protecting critical elevation levels in Lakes Powell and Mead, the indirect and cumulative repercussions to the Salton Sea region have not previously been considered for the operating guidelines and must be addressed and analyzed going forward. The anticipated environmental effects of further reduction of agricultural inflows to the Salton Sea are identified as impacting: Public health and safety Air quality Water quality and quantity Wildlife and vegetation, including endangered, threatened, and other special status species Wildlife movement corridors and migratory patterns Soils and lakebed Wetlands, and riparian areas Cultural and Archeological resources Visual resources and scenic values Recreation and tourism Economic losses and poverty of disenfranchised communities	The EcoMedia Compass	Andrew McDonagh
20965	7	WATQUANT - Water quantity	The Salton Sea will be dramatically impacted by reduced irrigation flows to the Imperial Valley if recent agreements to conserve 250 KAFY for four years extend to the long term. Irrigation drainage from the farms in the Imperial Valley, plus some cross border flow from Mexico, supplies roughly 90% of the inflow to the Salton Sea. For every three acre feet of water conserved by fallowing in the Imperial Valley one acre foot of drain water that would have flowed to the Salton Sea will instead be cut from normal inflows. For water conserved by on farm efficiencies the ratio of inflow reduction to the Salton Sea is one to one, meaning every acre foot of irrigation water cut is an acre foot of inflow cut from the Salton Sea. An extended conservation of 250 KAFY by fallowing, converting gradually to on farm efficiencies, will accelerate the loss of elevation of the Salton Sea, already underway due to water transfers, until it fully dries up by 2080, see Chart 1 above.	The EcoMedia Compass	Andrew McDonagh
20973	19	WATQUANT - Water quantity	The Service is concerned about the impacts that reduced flows in the Colorado River may have on the various river refuges ability to access and utilize Colorado River water to meet their specific refuge purposes; specifically whether current infrastructure will be able to access water future anticipated water elevations during times of year the refuges need that access. There could be significant cost to replacing infrastructure and/or new costs associated with pumping. As Reclamation is reviewing alternatives to the EIS we are requesting assistance in understanding if existing infrastructure will remain operable and assistance in engineering new or more efficient infrastructure as appropriate.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20982	4	WATQUANT - Water quantity	* The different roles Lakes Powell and Mead play in water management in the Upper and Lower Basins should also be recognized. Due to Lake Powell's location at the Utah- Arizona state line, the reservoir does not physically release water supplies to Upper Basin water users. Our water users rely instead on smaller, more localized watersheds to meet their needs. This, in turn, leads to Upper Basin water users being more vulnerable to variations in annual snowpack (particularly on a local level) and regularly encountering situations on a daily, weekly, monthly, or annual basis where there is not enough water physically available to meet their needs (i.e., hydrologic shortages). In stark contrast, Lake Mead has always been able to release a full supply of water directly to Lower Basin users.	Southwestern Water Conservation District	Steve Wolff

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21038	9	WATQUANT - Water quantity	In addition, as described in the water delivery discussion above, Reclamation's action alternatives may result in changes to Reclamation's management of Yuma-area pumped returned flows. Pumped return flows that cannot be delivered at the Northerly International Boundary due to compliance with Minute 242 are placed in the canal that supplies the Cienega de Santa Clara.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21081	8	WATQUANT - Water quantity	Increase water quantification technology: BOR should work with the Basin States to install additional gauges and water quantification instruments on as many streams, diversions, and ditches as possible; and provide funding and labor to ensure they are maintained. This will be critical to understand where and how water is used, as well as address the stewarding problem associated with demand management.	Dolores River Boating Advocates	Rica Fulton
21081	14	WATQUANT - Water quantity	Ensure water quantification technology is installed on as many streams, diversions, and ditches as possible, and provide funding and labor to ensure they are maintained.	Dolores River Boating Advocates	Rica Fulton
21087	2	WATQUANT - Water quantity	[...] For these reasons, Nebraska requests that the Bureau consider potential impacts of any post-2026 operational changes on the viability and vitality of continued [Colorado-Big Thompson] C-BT diversions.	Nebraska Department of Natural Resources	Thomas Riley
21169	2	WATQUANT - Water quantity	2. Previous modeling has shown some springs within the Reservation to be highly susceptible to decreases in flow caused by increases in groundwater pumping. The Tribe is concerned that the effects of increased groundwater use may cause decreased discharges or even the complete drying of springs that the Tribe relies on for consumptive, cultural, spiritual, and tourism use. The DEIS must evaluate the connection between lack of surface water supplies and how increases in groundwater may impact discharges at Tribal springs.	Havasupai Tribe	Thomas Siyuja
21169	5	WATQUANT - Water quantity	GROUNDWATER IMPACTS Reductions in surface water deliveries that will be part of any alternative will likely result in increased groundwater use to supplement water demands. As noted above, the Tribe relies almost entirely on groundwater which supplies the springs the Tribe uses for consumptive use and holds in cultural and spiritual significance. Groundwater fed springs are also the primary supply of water to the Tribe's surface water sources, including Havasu Creek, which feeds the waterfalls and pools that drives the Tribe's tourism-based economy. The effects of increased groundwater use that will result from reduced deliveries of Colorado River water must be identified and addressed	Havasupai Tribe	Thomas Siyuja
21169	6	WATQUANT - Water quantity	3. The Tribe is concerned that the reduction in groundwater levels caused by increases in groundwater use may lead to existing wells within Coconino County becoming less productive, causing municipalities and other water users to have to explore drilling new wells in more rural areas to meet their water demands. The Tribe is concerned that such exploration will lead to more wells being drilled in rural areas near the Reservation. Previous modeling efforts have shown that wells pumping closer to the Reservation have increased effects of causing decreases in discharge at Tribal Springs. This must be evaluated and analyzed.	Havasupai Tribe	Thomas Siyuja
21169	8	WATQUANT - Water quantity	4. The Tribe has existing and .proposed wells on the Coconino Plateau that will be used for consumptive use as the Tribe continues to work towards developing additional housing for Tribal members. The changes in groundwater use described in points 1-3, has the potential to decrease well productivity, increase power costs for pumping groundwater, and increase well drilling costs (applies only to proposed wells) for existing and proposed Tribal wells on the Coconino Plateau. The DEIS must include consideration the of effects of increased groundwater use on Tribal groundwater development on the Coconino Plateau.	Havasupai Tribe	Thomas Siyuja
Form 2	-	WILD - Wildlife	While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.	National Audubon Society	
Form 2	-	WILD - Wildlife	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply. In particular, I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor. In fact, some 70% of all wildlife in the region visit the Colorado Rivers remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.	National Audubon Society	
494	1	WILD - Wildlife	Environmental Sustainability: Reducing water outtake from Lake Powell is essential to protect the ecological health of the lake and its surrounding environment. As water levels decline, critical habitats for various wildlife species are threatened, leading to potential disruptions in the delicate ecosystems that thrive in and around the lake. By preserving higher water levels, we can ensure the survival of native flora and fauna, safeguarding biodiversity for future generations.		Matthew Riddle

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682	2	WILD - Wildlife	While the loss of even one species is a tragedy for all mankind, loss of these habitats is also a loss of valuable recreation and scientific opportunities.		Elizabeth Hamilton-Byrd
771	1	WILD - Wildlife	I would like to speak on behalf of the wildlife that have no voice in this matter. Many birds are threatened by the way humans live. They are declining rapidly, and will continue toward extinction if water flow like the Colorado is not kept at a level to sustain them Please keep bird numbers strong.		Rebecca Lewis
849	1	WILD - Wildlife	Please keep the birds and other wildlife in the front of your mind when making your decisions. When wildlife can thrive, that means a healthy planet for us all		Jason Relyea
1013	1	WILD - Wildlife	However, I very much hope the Bureau of Reclamation will work to protect habitat for birds and other wildlife just as vigorously.â€¯ We have to protect the habitat we have left.		Shannin Zevian
1100	1	WILD - Wildlife	Protect the Colorado and the many ctratures who depend on it		Janet Bergamo
1182	2	WILD - Wildlife	Please reconsider how much water is wasted instead of being wisely used to protect riparian habitats		Mary King
1209	2	WILD - Wildlife	and animals in the wild who need its water for survival.		Susan Fong
1294	1	WILD - Wildlife	The poor wildlife suffers from our encroachment on their natural habitats.		Hope Duchaine
1295	2	WILD - Wildlife	and animals in the wilderness who need it for their survival.		Susan Fong
1311	1	WILD - Wildlife	So many animals as well as people depend upon the Colorado River!		Mary McLean
1320	1	WILD - Wildlife	We vote. We are Birders. We want greater protections for out lands,and wildlife.		Debra Taylor
1456	1	WILD - Wildlife	Birds are essential not only to a healthy wildlife habitat but to human psyche. Please consider the wellbeing of all earthâ€™s creatures when deciding the flow of the Colorado River.		Mindy Meadows
1483	1	WILD - Wildlife	Please protect ALL who use the Colorado River, including flora, fauna and wildlife		Lynda Beltz
1542	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯		Devin Neitzert
1562	1	WILD - Wildlife	ANIMALS HAVE NO VOICE TO ASK FOR HELP. SO WE MUST BE THEIR VOIC TO ENSURE THAT THEIR HABITAT IS PROTECTED AND ALL NONHUMAN ANIMALS ARE SAFE.		Gail Repensek
1731	1	WILD - Wildlife	It provides essential habitat for hundreds of species of resident and migratory birds, including the Yellow-breasted Chats, Summer Tanagers, and endangered species including the California Condors and Southwestern Willow Flycatchers.â€¯		JEAN Naples
1731	3	WILD - Wildlife	I strongly urge the U.S. Bureau of Reclamation to please publish protective mandates that will ensure full protection for the future of ALL the habitats, birds,		JEAN Naples
1957	4	WILD - Wildlife	he federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯		Kimberly Hall
1979	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected		Don Rose
1988	1	WILD - Wildlife	If the Colorado River isn't to remain a habitat for birds and wildlife, then might as well just send it all to ranches and Las Vegas now--why bother?		Kelly Eigler
2014	1	WILD - Wildlife	It is important that protecting the water for humans does not destroy its value to the wildlife populations that depend on the river as well.		Jenny Hourihan
2065	1	WILD - Wildlife	One river, one critter, one action at a time: we MUST take these actions now.		patricia stewart
2068	1	WILD - Wildlife	I am a grandparent and I am horrified by what we are doing to earthâ€™s species. My grandchildren may never know the beauty of birds or the sound of frogs. We must manage our resources with a much more intentional focus on preserving native species. This is why I am writing you about the Colorado River.		Susan Stock
2176	1	WILD - Wildlife	Please ensure these critical habitats are protected.		Nicole Wright

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2183	1	WILD - Wildlife	Your support of wildlife is vital!		Flora Yen
2285	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯		Marilyn Leatherman
2354	1	WILD - Wildlife	The Colorado River is the lifeblood of the American West. It provides essential habitat for hundreds of species of resident and migratory birds, such as Yellow-breasted Chats and Summer Tanagers, and endangered species like California Condors and Southwestern Willow Flycatchers.â€¯But now the river and its habitats are at risk of running dry.		Catherine Kappel
2361	1	WILD - Wildlife	Please make sure that habitat for birds and other wildlife remains protected.â€¯		Gordon James
2372	1	WILD - Wildlife	Hundreds of species of resident and migratory birds depend on the Colorado River for essential habitat. This habitat must be protected if birds and other wildlife are to survive.		Peter Followill
2437	1	WILD - Wildlife	The future of many species of wildlife,		Renate Pealer
2473	1	WILD - Wildlife	I have worked with Nebraska Audubon for over 20+ years. This organization knows what it is talking about and I hope you will indeed insure and protect the habitat for birds and other wildlife		Teresa Schmidt
2474	1	WILD - Wildlife	As you consider actions to take, please remember to ensure habitat for birds and other wildlife - don't simply look at human and economic interests.â€¯		Judy Schultz
2567	1	WILD - Wildlife	The lives of innumerable birds and people depend on your total support to keep this wonderful natural place flowing!		Terry Goodfield
2593	1	WILD - Wildlife	Our survival depends on the survival of other species.		Linda Brown
2644	1	WILD - Wildlife	As humans spread like the plague we've become, we need to protect habitats and waterways for the animals that are unfortunate enough to share this planet with us. All these decisions about the Colorado River need to set a huge place at that table for the birds, fish and animals that were here long before we came in and started to destroy everything. You need to remember these beings and places that have no voice in what we are doing. You need to be that voice. These are important places and important creatures. They don't stand a chance against us. Yet we are allowed to continue to move into areas that can not sustain us at the detriment of all other creatures. Not fair, not right.		Susan Rodriguez
2737	2	WILD - Wildlife	Please consider ALL while deciding the future use of the Colorado River. This includes the birds and animals and their habitat		Curtis Peacock
3102	1	WILD - Wildlife	we are the guardians of our precious birds that visit us and migrate they have a right to live		Sarah Gannon
3646	1	WILD - Wildlife	JUST REMEMBER TO INCLUDE BIRDS IN PROTECTING THE COLORADO RIVER		Merrill Bobele
4081	2	WILD - Wildlife	A wholistic approach of looking at the important role that birds play on balancing ecosystems, such as being natural way of keeping insects in check, must also be considered.		Valerie Van Griethuysen
4432	1	WILD - Wildlife	Over the decades, wildlife has lost a frightening amount of habitat--they can't afford to lose any more. The stakes are enormous, not just for people, but for the birds		Susan Hillman Bourne
4611	1	WILD - Wildlife	When I think of the Colorado River I think of it as a habitat for multiple species. I have a particular affinity for the birds but think of all wildlife who depend on the river environment for their survival.		T. Anne Richards
5028	1	WILD - Wildlife	Please do everything in your power to ensure habitat for birds and other creatures.		Mary Etherton
5284	1	WILD - Wildlife	My greatest concern for the future of the Colorado River is protecting and restoring habitat and ensuring long-term water availability for birds and wildlife that are dependent on that river, its tributaries and its riparian corridors. Please plan for long-term support of wildlife in your decisions on future protection and management of Colorado River flows.		Nancy Sekijima
5779	1	WILD - Wildlife	Wildlife is essential to the health of the river and its ecosystem.		Lynda Heideman
5908	1	WILD - Wildlife	the birds and other wildlife that depend on the Colorado River are a national treasure and protection of the Colorado River must take them into account as the Bureau formulates plans to protect and preserve the Colorado River.		Richard Landfield
6371	1	WILD - Wildlife	We need to be militant and protect in every way possible what birds we have left		Marie Torget
6378	1	WILD - Wildlife	I also urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯		Holly Windle

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6550	1	WILD - Wildlife	Please take care of these habitats for the sake of our wildlife as well as the people.		Jessica MacNeil
6972	1	WILD - Wildlife	Please do your best to help preserve the animals and the habitats that these animals depend on.		Evelyn Fenter
7002	1	WILD - Wildlife	I want to save the Colorado River and all the nature and wildlife that live in on and around it.		Gary Larson
7143	1	WILD - Wildlife	Please preserve habitat for the birds and animals that rely on the Colorado river!		Margaret Van Acker
7451	1	WILD - Wildlife	Bird and wlldlife has declined as we rack up massive amounts of habitat loss--we can't afford to lose any more.		Chris OMeara Dietrich
7478	2	WILD - Wildlife	As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change, and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that depend on them.â€¯		Hazel E Cross
7755	1	WILD - Wildlife	Thereâ€™s an ongoing urgent need to continue removing invasive plant species from the riparian corridor. Policies should be in place for the removal of invasive species and planting of native species to conserve Colorado River water.		Nancy Caponi
7827	1	WILD - Wildlife	Over the decades, we've lost a massive amount of habitat--we can't afford to lose any more.The stakes are enormous for people, for birds, and for the entirety of our country.		Richard Van Aken
7837	1	WILD - Wildlife	Without birds that are a key link in the food chain, humans will perish.		Patricia Shaw
7953	1	WILD - Wildlife	Please take into consideration the important role the Colorado River has for everyone, but especially the birds and wildlife that cannot speak for themselves. The Colorado River plays a critical role in the life of migratory birds and the habitat of everyone and everything that depends on it.		Lanis L Hicks
7969	1	WILD - Wildlife	please protect the river in a manner that protects habitat for the creatures that live along the river.		Wesley Wallace
7989	2	WILD - Wildlife	As a critical component of the river system management, I urge the Bureau of Reclamation to ensure that wildlife habitats also have a secure water supply. Areas of wildlife habitat in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea and wetlands in the Colorado River Delta all need sustained water.		Paul West
8044	1	WILD - Wildlife	Bureau of Reclamation, please ensure habitat for birds and other wildlife stays protected.â€¯		Sue Stoudemire
8236	1	WILD - Wildlife	hile I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯ The narrow riparian corridor along the river itself provides habitat--quality habitat that is far more important than the relatively meager acreage it represents.		Thomas Jervis
8242	2	WILD - Wildlife	The Bureau of Reclamation must ensure habitat for birds and other wildlife remains protected.		Edward and Beatrice Simpson
8242	3	WILD - Wildlife	Birds must have certain habitats to continue their time on this beautiful planet. We are told 70% of all wildlife in the region visit the Colorado River's last wetlands and riparian forests		Edward and Beatrice Simpson
8416	1	WILD - Wildlife	Please protect downstream habitats for all species of plants and animals.		Susan Waters
8550	1	WILD - Wildlife	If you ask us, much of Colorado River water should be for the birds! My family, friends, and I love birding, and want to make sure the Bureau of Reclamation takes into account the needs of wildlife as it make decisions about the future of the river.		John Knox
8569	1	WILD - Wildlife	Habitat for birds is crucial.		Palmira Brummett
8678	1	WILD - Wildlife	In fact, some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.â€¯		Hannah Bonsey Suthers
8840	1	WILD - Wildlife	please include all birds, mammals fish when considering the future use of The Mighty Colorado. Our PLANET and all itâ€™s creatures need to be considered- not just humans or money.		Alison Victor
8895	2	WILD - Wildlife	Our whole family has loved the beauty of the Colorado River, wildlife and botany. Please put in place protections so that habitat is safe for all living things		Melissa A Riparetti-Stepien

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8934	2	WILD - Wildlife	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.		David Newman
9064	1	WILD - Wildlife	AUDUBON'S PLEA FOR HABITAT PROTECTION ECHOS MY FEELINGS.		KARLA Forrest
9074	1	WILD - Wildlife	But as part of the plan, I urge the Bureau of Reclamation to act and mandate continued protection for the habitat for birds and other wildlife.â€¯		Douglas Lippoldt
9122	1	WILD - Wildlife	We have had the opportunity to traverse the River through the Grand Canyon in its entirety and know from that experience the majesty and power of the â€˜Riverâ€™. The canyon wren and the â€˜flying plankâ€™ (California Condor) feature in the necessary habitat provided by the Colorado River.		Gary Ranz
9318	1	WILD - Wildlife	Birds and other wildlife cannot advocate for themselves on this critical issue. Please represent their needs and in urging these area to be sustained and protected for their use for decades to come.		Daphne Russell
9519	1	WILD - Wildlife	Please DO ALL YOU CAN to protect the future of all - birds, their habitats,		Bonnie MacRaith
9614	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.		Sharon Enzi
9635	1	WILD - Wildlife	Animals need water too! Please help protect habitats.		Catherine Decker
9639	1	WILD - Wildlife	We need the Colorado River for our very survival not to mention all the other animal and plant species that require this water for their survival.		R. Zierikzee
9672	1	WILD - Wildlife	This request is about birds and people and we can't afford to separate the two. Once the birds are gone, humans will soon follow.		Sherilyn Burns
9735	1	WILD - Wildlife	The health of wildlife in the area impacts pollinators and other key species,		Mary Hogan
9865	1	WILD - Wildlife	I'm urging you to take into consideration the importance of the river to the birds and wildlife that rely on it, including migrating and endangered species.		Jane Haspel
10023	1	WILD - Wildlife	Over the decades, we've lost TOO MUCH habitat--we CANNOT and WILL NOT afford to lose any more!!!		Jeffrey DeCristofaro
10152	1	WILD - Wildlife	As a supporter of the National Audubon Society, I have become greatly concerned about the vast numbers of birds which have vanished over the past few decades. I have also come to understand the urgent need to protect the habitat of birds and the wildlife & organisms they rely on to maintain the species. A vital habitat and irreplaceable source of water for humans, birds and other wildlife is the Colorado River.		Anne T McKenna
10164	1	WILD - Wildlife	I understand that as the Bureau of Reclamation its remit may be less inclined to think beyond human demands and self-interest: the developers, agricultural interests, sports and recreation, etc....with nary a thought, or little thought to the non-human complex biology also relying on the river. It is with that concern, that I am writing to you today.		Hannah MacLaren
10250	1	WILD - Wildlife	Please protect the birds!		Cynthia Barnard
10341	1	WILD - Wildlife	We must save the Great Colorado River!!! Animals also use this river and can not be without this river! We rarely realize the fact that our welfare is connected to our wildlife ... yet we canâ€™t live without wildlife and our attention to this issue!		Paula Morgan
10432	1	WILD - Wildlife	Please consider, whatever decisions/solutions are made, survival of species depend on this river. Hopefully the Colorado River with its habitats will continue for many years to come ensuring not only the survival of species but the people who also depend on it.		Lydia Flores
10451	1	WILD - Wildlife	Letâ€™s protect ALL species and retain their habitats.		Diane Wallace
10493	1	WILD - Wildlife	WE NEED YOUR HELP TO SECURE THE COLORADO RIVER FOR OUR WILD NATUAL CREATURES AS WELL AS FUTURE GENERATIONS.		SUZANNE Dauber
10517	1	WILD - Wildlife	Please, help to protect our planet and wildlife.		Jennifer Ratzat
10688	1	WILD - Wildlife	However, it is essential that the Bureau of Reclamation makes every effort to ensure this vital habitat for birds and other wildlife remains protected.â€¯ Please carefully consider all the potential adverse affects of proposed management actions and establish solutions for habitats that do not have a secure water supply.â€¯â€¯		Carol Moore
10698	1	WILD - Wildlife	WE MUST PROTECT THE ANIMALS AND THE BIRDS AS THEY ARE INDICATORS OF THE NEXT MASS EXTINCTION.		Patricia Reynolds
10791	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for wildlife remains protected.â€¯		Joseph Chlup

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10791	2	WILD - Wildlife	I ask you consider bird habitats in the Grand Canyon, the Lower Colorado River, the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like Americas symbol, the Bald Eagle. More than a third of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.â€¯		Joseph Chlup
10853	1	WILD - Wildlife	FIRST AND FOREMOST, WHEN COLORADO RIVER WATER IS ALLOCATED, THE NEEDS OF THE RIVER ITSELF MUST BE MET. THEN THE HUMANS CAN HAVE WHAT IS LEFT. IF YOU. COULD SEE THE â€œMIGHTY RIO GRANDEâ€ IN MIDSUMMER YOU WOULD CRY. LONG STRETCHES OF IT ARE DRY. FISH MUST BE RESCUED FROM THE PITIFUL LITTLE POOLS WHERE THEY ARE STRANDED.		Adele E Zimmermann
10882	1	WILD - Wildlife	This means protecting the area for all its wildlife--it's not just about humans, but about the whole planet. It is important that the demands of humans do NOT crowd out the needs for all species.		Julie pearce
10902	1	WILD - Wildlife	I am a bird lover and I am grieving that there are fewer and fewer song birds just in the last 2 years. We must take bird welfare into account very seriously when we make plans for major habitats, such as the Colorado River.		Susan Broadhead
10952	1	WILD - Wildlife	Please consider the effect on wildlife habitat and ecosystems in your deliberations. Human life is interdependent with wild species, birds, plants and pollinators.		Jo Ellen Bate
11000	1	WILD - Wildlife	Please be certain to give fair measure to wildlife of all kinds.		Adair DeLamater
11011	1	WILD - Wildlife	The current river management does not guarantee water for the habitats that support tens of millions of birds. Essential refuges and migration stopovers that depend on water from the Colorado River, like the Salton Sea in California and the Cienega de Santa Clara in Mexico, as well as global treasures like the Grand Canyon, could go dry within our lifetime. How we manage the river not only impacts countless birds		Nancy Jensen
11081	1	WILD - Wildlife	Please do your part to protect and defend the habitats of ALL living beings, especially endangered plants and wildlife, including birds, in the Colorado River Basin!		Patricia Stevenson
11093	1	WILD - Wildlife	It is vital to an untold number of species of plant and animal life.		Jill Stephenson
11146	1	WILD - Wildlife	Please do the right thing and protect the future of the Colorado River and the wildlife that depends on it.		Bella Romain
11266	2	WILD - Wildlife	ensuring that we can continue to enjoy these species in their natural environment.		Karen Blackmore
11287	1	WILD - Wildlife	See for yourself - take a raft trip thru the Grand Canyon, or watch and observe for a while at the southern end of the Salton Sea to see the abundance of birds and other wildlife.		Gary Adler
11297	1	WILD - Wildlife	Moreover, the population of birds in North America has declined by at least one third in the last 50 years. The population of song birds has declined by 50 percent in the last 40 years. We cannot have silent springs.		Karl Ebert
11608	1	WILD - Wildlife	Are you going to ensure habitat for birds and other wildlife remains protected or let them go extinct?		Louise Gray
11681	1	WILD - Wildlife	I also absolutely support the Bureau of Reclamation ensuring habitat for birds and other wildlife now and over time.		Rada Salomon
11809	3	WILD - Wildlife	Around 70% of the regionâ€™s wildlife rely on the riverâ€™s wetlands and forests during their life cycles, including 400 bird species along the Lower Colorado River.		Ken Kurtz
11815	1	WILD - Wildlife	Birds and other wildlife were here long before humans created climate change		James Atkins
11856	1	WILD - Wildlife	I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta--all of which need sustained water in order to protect some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor.		David Williams
11917	1	WILD - Wildlife	Too many plant, bird, and animal species have become extinct over the last 35 years.		Jennifer Schierloh
12156	1	WILD - Wildlife	Do your kart to protect our beautiful wild birds		Jane S Culp
12528	1	WILD - Wildlife	PLEASE help protect our wildlife and natural resources.		Laurie Wachter
12546	1	WILD - Wildlife	We need to protect wildlife as they are a part of our world.		Charlotte Keller

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12583	2	WILD - Wildlife	We have to SAVE our Wildlife, including the incredible array of Birds. We have to STOP the senseless killing of our Wildlife out of Ignorance and Greed!		Tracey Bonner
12812	1	WILD - Wildlife	The EIS must acknowledge the extensive resources that have emerged in Glen Canyon. As the reservoir has dropped, significant amounts of riparian ecosystems and wildlife habitat have emerged, which provide immense value and health to the surrounding desert. This reality must be addressed in the EIS so that it can be effectively considered and not undone by future policy.		Theo Gochnour
12895	1	WILD - Wildlife	This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding. In fact, some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.â€¯ These species, aside from being iconic, are indicators of the overall health of the land, the decline of these species shows that there is a lack of nutrients and water in the natural areas we rely on for stable climate, agriculture, and beautiful land like those In National parks, monuments, forests and State parks and blm land.		Kaleb Anderson
12966	1	WILD - Wildlife	WE DO NOT SURVIVE WITHOUT HEALTHY, SAFE, PROTECTED HABITATS AND ECOSYSTEMS!!!		Carol Hatfield
12976	1	WILD - Wildlife	Please act like wildlife are citizens and protect their rights, too! Besides, we human citizens depend on wildlife for inspiration, sport, and positive mental health fueling inspiration, wonder, and joy. Include birds and all other wild creatures in the calculus of deciding how to protect the Colorado River.		Wendy Williams
12996	1	WILD - Wildlife	REMEMBER the birds! Once they become EXTINCT...we are NEXT!!!		Jeanne Thompson
13108	3	WILD - Wildlife	Last, measures must be included in the Post-2026 Guidelines that will protect the river itself, the fish, wildlife, and the plants that depend on the river.	Southern Ute Indian Tribe	Astor, Feather
13120	1	WILD - Wildlife	I live along the Colorado River in Blythe California, itâ€™s in my backyard. In the past years Iâ€™ve seen many fires, man made and natural. Iâ€™ve seen wildlife such as birds, bears, and deer fleeing their homes due to such disasters. It makes me sick to my stomach and saddens me. I would love to help.		Angelina Urias
13155	1	WILD - Wildlife	What does NOT have alternatives are the flora and fauna that depend on the Colorado River and the habitats it provides. Your decisions will determine what species survive and what don't - the very species that define the American West. Protecting it for future generations is essential.â€¯		Terry Derting
13192	1	WILD - Wildlife	More than all the pleas for protection above is the fact that birds enrich our lives. They provide seed pollination, offer colorful change to the environment and their birdsong is often charming and endearing.		Linda Boccia
13265	1	WILD - Wildlife	Over the decades, we've lost a massive amount of habitat--it would be a shame to lose more.		Michelle Scott
13725	1	WILD - Wildlife	PLEASE PROTECT THESE Precious Rivers and HABITATS Now!!!		Amy Wegner
13871	1	WILD - Wildlife	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ The restoration of forest and grassland cover to retard soil erosion and retain/rebuild water tables is critical. plant alders & softwoods, restore beavers upstream in the tributaries protect forests from human encroachment, stop routing un-protected power lines and leaky pipelines through forests to reduce wildfires, soil/water contamination, make use of coastal wind power, tidal power.		Betsy Cornwell
13982	1	WILD - Wildlife	Please protect this extremely important Colorado river for the future generations of wild life.		Denise Edwards
14129	1	WILD - Wildlife	Our world needs all wildlife to maintain a healthy ecosystem. We must do all we can to utilize this resource for the benefit of all!		Jim Merkle
14137	1	WILD - Wildlife	I agree that the river and its wildlife habitats MUST be protected.		Crystal Ganley
14167	1	WILD - Wildlife	I have a teenage son and am working to help protect the planet for this future. We must act now to save wild places and creatures under threat from the climate crisis and habitat destruction.		Nishanga Bliss
14174	1	WILD - Wildlife	It is imperative that we protect our birds and other animals along with their habitat, which happens to be the Colorado River.		KATHRYN WATKINS

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14214	1	WILD - Wildlife	While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯The river is part of the Western Flyway and as such is needed, to ensure that water birds and migrating songbirds (which eat destructive and disease-carrying insects) can live. Please protect the voiceless ones as well as human beings. We have lost so much habitat already to rampant development. The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯ With the Wetlands protection being gutted by the current supreme court, this is more essential than ever. Water really is Life.		Brenda Bailey
14297	1	WILD - Wildlife	We want to take action to make sure the Colorado Riverâ€"and, all the habitats, wildlife, and communities that rely on itâ€"do NOT disappear! The Colorado River is the lifeblood of the American West, providing water for more than 40 million people. The wetlands and, riverside, forests along its banks create, essential, habitat for hundreds of species of, resident, and, migratory birds, such as Yellow-breasted Chats and Summer Tanagers, and, endangered, species including California Condors and Southwestern Willow Flycatchers.		Diane Kastel
14377	1	WILD - Wildlife	The Colorado River provides water for me to drink to cook with to survive please manage it with people in mind as well as the birds and the vegetation.		William Damashek
14452	1	WILD - Wildlife	Do what is necessary to assist the flora and fauna of the Colorado River areas!		Constance Minerovic
14496	1	WILD - Wildlife	he California Condor, in particular, is a unique species that has already been decimated by other human actions and is the largest bird of any kind in the "New World		Jan Mehn
14548	1	WILD - Wildlife	We must keep the river as a haven for wildlife. It is their home. We cannot continue to ignore the needs of the other life on this little planet. Do the right thing.		Hugh McFadden
14704	3	WILD - Wildlife	We KNOW how much birds add to our lives here. We see the nesting, the egg laying & new babies year after year. I don't want my grandchildren, & future great grandchildren to never know how important birds & other creatures are to human wellbeing. And I thank God for the sound of the birds outside my window each day.		Susanna L. Wells
14729	1	WILD - Wildlife	I also recognize the vital role the river plays in providing and sustaining critical habitat for birds and other wildlife. I urge the Bureau of Reclamation to ensure protection for such habitats into the future.		Wallace Elton
14826	1	WILD - Wildlife	I urge the Bureau of Reclamation to accomplish this while also ensuring that habitat for birds and other wildlife remains protected.â€¯ We can do both.		Patrick Bosold
14982	1	WILD - Wildlife	Please help our birds!		Cynthia Pantos
14988	1	WILD - Wildlife	I am well aware of its importance not only to people, but to the many birds and other wildlife that rely on the river for their food and habitat.		Joyce Kidd
15091	1	WILD - Wildlife	I am especially concerned about habitat for migratory birds because it is often overlooked. Areas that are critical for species survival may be used by these species for only a relatively brief time.		E. William Yund
15132	1	WILD - Wildlife	It's a huge loss to our wildlife habitat and connectivity.		Pamela Nelson
15575	1	WILD - Wildlife	Included should be actions to ensure that habitat for birds and other wildlife remains protected and viable.		Rustom Jamadar
15583	1	WILD - Wildlife	As a supporter of the Audubon Society, I respectfully request that the Bureau of Reclamation makes provisions to ensure habitat for birds and other wildlife remain protected.â€¯		Grace Silva
15739	2	WILD - Wildlife	The federal government needs to look more broadly and carefully at the impacts of proposed management actions and create solutions for habitats that do not have a secure water supply.â€¯â€¯		Veronica Stewart
16012	1	WILD - Wildlife	PLEASE PROVIDE WATER FOR MIGRATING BIRDS!		Adrienne Inglis
16037	1	WILD - Wildlife	Since this river impacts many millions of people, it needs to be protected not only for them, but for all the wildlife & birds it impacts as well.		Bonnie Beres
16235	1	WILD - Wildlife	We must protect the Colorado River and safeguard the future of the birds, fish, and other wildlife and wild land that depends on the watershed for their very survival.		Frank Klug
16442	1	WILD - Wildlife	I can't imagine what life would be like without birds and wildlife in our environs! I look to you to be a guardian of these treasures in our life.		Cheri Walsh

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16542	1	WILD - Wildlife	In fact, some 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, including 400 different bird species along the Lower Colorado River.â€¯ We are losing species of plants and wildlife every year so it is highly imperative that every element of life along this important waterway be considered in all actions that are being considered!!		Martha Coppola
16616	2	WILD - Wildlife	Simultaneouly, the Bureau of Reclamation must ensure that unspoiled habitat for birds and other wildlife remains protected.â€¯ Birds, vitay important insects, pollinators, medicinal plants and countless other wildlife species are dying off at utterly alarming rates.		Lloyd Williams
16640	1	WILD - Wildlife	Considering and preserving birds and other wildlife that rely for survival on the Colorado River is critical.		Linda Averill
16958	1	WILD - Wildlife	Please make good decisions to protect the birds and their natural riparian habitats. Make choices in water resource management that protects ALL. We love birds.		Joe Sipp
16960	1	WILD - Wildlife	Please think heavily about protecting the wildlife who depend on your management and decisions on natural resources and land use. We love birds.		Christine Sipp
16961	1	WILD - Wildlife	I need your help. We love birds. My family, my daughters, my friends and my parents. Their grace and agility and ability to amaze us. They help keep balance in nature and we need to protect them and their habitats.		Carissa Sipp
16962	1	WILD - Wildlife	We love birds. Their grace and agility and ability to amaze us. They help keep balance in nature and we need to protect them and their habitats.		Dan Hunt
17236	3	WILD - Wildlife	As I have stated, it is necessary that the Bureau of Reclamation ensure that habitats for birds and other wildlife remains protected.â€¯		Erin Peffley
17236	4	WILD - Wildlife	The federal government must take an extensive and careful look at the impacts of proposed management actions. It is especially important to create viable solutions for habitats that do not have a secure water supply at this time. In particular, I hope you will consider bird habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta. Each of these needs sustained water in order to protect beloved bird species such as the American Bald Eagle, the Yellow Warbler, and the California Condor. Seventy percent of the wildlife in the region visit the Colorado Riverâ€™s wetlands and riparian forests during their life cycles. This includes 400 different bird species along the Lower Colorado River.		Erin Peffley
17241	7	WILD - Wildlife	3. There are a number of Colorado River-dependent habitats with outsized importance for birds. Reclamation's metrics for evaluating management action alternatives must be able to assess impacts to: habitats managed for endangered species such as the Upper Colorado River Basin and San Juan Recovery Implementation Programs and the Lower Colorado River Multi-Species Conservation Program; National Wildlife Refuges on the Colorado River and its tributaries; the Grand Canyon; the Salton Sea; the Cienega de Santa Clara; and habitat values of irrigated agriculture (which provides forage in many locations where native vegetation has disappeared).	National Audubon Society	Jennifer Pitt
17241	19	WILD - Wildlife	Other resource impact analyses should include (but not be limited to): - Biological resources in the Colorado River and tributaries including riparian species and habitats;	National Audubon Society	Jennifer Pitt
17241	39	WILD - Wildlife	Reclamation's decision should both include management options that intentionally improve freshwater-dependent habitats and the species that rely on them, and also fully evaluate the impacts of all management options on freshwater-dependent habitats and the species that rely on them	National Audubon Society	Jennifer Pitt
17384	1	WILD - Wildlife	I urge the Bureau of Reclamation to ensure habitat for birds and other wildlife remains protected.â€¯		Marian Argentino
17464	1	WILD - Wildlife	All species, not just humans, need sustained water in order to survive.		Stephanie Todd
17504	1	WILD - Wildlife	support the Bureau of Reclamation relative to the research and continuing efforts and wisdom of the Audubon Society regarding small creatures in the big picture of the Colorado River.		Amy Lehner
17585	1	WILD - Wildlife	I also urge the Bureau of Reclamation to prioritize habitat protection for birds and other wildlife that depend on the river as much as we do.		Jennifer Alsen
17925	1	WILD - Wildlife	Please consider the future of our wildlife in all your decisions regarding this beautiful area! Future generations will be eternally grateful, and so will the flora and fauna.		Tanya Dixon
18113	1	WILD - Wildlife	Please give major consideration to protecting wildlife when making decisions about the future of the Colorado River.		Florence McBride
18199	1	WILD - Wildlife	While I support more rigorous actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term, as an environmental educator and field biologist as well as a parent and grandparent who cares deeply about conservation and preserving biodiversity, I urge the Bureau of Reclamation to ensure that habitat for birds and other wildlife remains protected.â€¯ We are already in the midst of a near extinction crisis involving many wildlife species and insects as well.		Theresa Kardos

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18214	2	WILD - Wildlife	If we do not support these habitats and the wildlife that they enable to thrive, we will have lost resources that stabilize our own human lives, and the civilization we hold dear. We depend on a rich ecosystem -- we must protect it or we will lose more than we know.		Elizabeth Long
18237	1	WILD - Wildlife	I agree that actions to reduce the amount of water used on the Colorado River to protect reservoir levels and flows for the long-term are important, but I request that the Bureau of Reclamation make sure that habitats for birds, animals, and flora and fauna are safe.		S. Frye
18325	1	WILD - Wildlife	The diversity of our ecosystems is of vital importance and the loss of bird species can negatively impact US agricultural prowess.		Jo Dee Duncan-Mosier
18539	1	WILD - Wildlife	As a concerned constituent, I canâ€™t emphasize how important the protection for our birds are and encourage you to act accordingly.		Monica Moore
18570	1	WILD - Wildlife	PLEASE do not choose to disregard the desperate needs of animals who reside in the Colorado River system. Losing our beautiful wildlife neighbors due to over usage of water by thoughtless humans would be devastating to this planet and the human race. We must ensure that the wildlife with whom we share this beautiful planet are given full consideration along with human beings.		Patty Ridenour
18763	1	WILD - Wildlife	The Colorado River is the lifeblood of the American West. It provides essential habitat for hundreds of species of resident and migratory birds, such as Yellow-breasted Chats and Summer Tanagers, and endangered species like California Condors and Southwestern Willow Flycatchers.		Pamela Denmon
19167	3	WILD - Wildlife	Without protection, wildlife is at risk.		Claudia Baxley
19768	1	WILD - Wildlife	As you know, these areas are home to some of America's most unique and iconic bird species like the Bald Eagle, Yellow Warbler, and California Condor. Around 70% of all wildlife in the region visit the Colorado Riverâ€™s remaining wetlands and riparian forests during their life cycles, which makes preserving these sensitive areas of utmost importance.		Katherine Ralston Pruess
20193	1	WILD - Wildlife	PLEASE, help protect and preserve wildlife that depends on the Colorado River.		Adrian Farnsworth
20417	7	WILD - Wildlife	Healthy river flows must be maintained to support irreplaceable wildlife habitat, environmental resources,	Western Resource Advocates	Bart Miller
20469	2	WILD - Wildlife	* healthy native fish populations, including the federally listed Humpback Chub, supported by a sustainable, diverse and productive aquatic food base,	Grand Canyon River Guides, Inc.	Lynn Hamilton
20490	18	WILD - Wildlife	NPS also requests that Reclamation analyze impacts of the proposed alternatives on the federally endangered razorback sucker population in Lake Mead. Lower water levels may have positive or negative effects on this population depending on the interactions between warmer water, reduced habitat, changing water depth, dissolved oxygen concentration, non-native invasive fish species, and quagga mussels.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	21	WILD - Wildlife	Endangered and threatened fish in other segments of the river may need to be considered. If the Drought Response Operations Agreement (DROA) or similar flows are considered out of Flaming Gorge Dam or Aspinall Dam, then NPS will urge Reclamation to harmonize those flows with experimental fish flows including the razorback sucker Larval Trigger Study Plan, smallmouth bass flow spikes, and pikeminnow base flows, while analyzing multi-year impacts on the vegetation, channel complexity and fish habitat diversity. Maintaining more interannual flow variability on the Green and Gunnison Rivers may be needed to prevent vegetation encroachment, channel simplification (Graf 1978, Andrews 1986, Lyons et al 1992, Allred and Schmidt 1999, Grams and Schmidt 2002, Walker et al 2020), and loss of fish spawning and nursery habitats including cobble bars, backwaters, and wetlands (USBR 2006, Grippo et al. 2017).	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	22	WILD - Wildlife	Reclamation should also consider at what reservoir levels barriers are formed or removed that may restrict movement of native and non-native fish. For instance, at Pearce Ferry, rapids have formed with Lake Mead being at a lower level that may be preventing invasive fish from moving up into the Grand Canyon and preying on natives and changing water levels may increase or decrease that barrier. Barriers may appear or disappear at different levels in other locations including in Cataract Canyon at the top end of Lake Powell or in the San Juan arm of Lake Powell that may have effects to fish movement (Bruckerhoff et al. 2022). Flow changes will also impact threatened and endangered fish below the Hoover dam. Other endangered and threatened species including birds and plants may be impacted by the changes to riparian habitat and NPS will be sharing some of that as a cooperating agency and in close coordination with USFWS.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott
20490	28	WILD - Wildlife	Design alternatives to proactively protect federally listed species, such as humpback chub, from drawing closer to extinction.	National Park Service; National Park Service, Interior Regions 6,7,8; National Park Service, Interior Regions 8,9,10	Billerbeck, Rob P; Kate Hammond; Billy Shott

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20733	4	WILD - Wildlife	Please consider the impact to wildlife and fisheries as well when developing alternative to improve water retention in the reservoir.		Jake Schoppe
20899	8	WILD - Wildlife	Endangered Fish Survival and Recovery Amidst Aridification Under both NEPA and the ESA, Reclamation must consider effects on survival and recovery of endangered fish in the Colorado River system, and, in the context of this EIS and its accompanying Biological Opinion, must proactively plan infrastructure and flows to facilitate endangered fish recovery amidst aridification and climate-inevitable dead pool conditions. a. Given the relative lack of warm water non-native fish in the Colorado River through Grand Canyon, and given the downsteam fish barrier that Pearce Ferry rapid may provide, the Bureau of Reclamation, National Park Service, and U.S. Fish and Wildlife Service should plan now for managing the Colorado River through Grand Canyon National Park as a stronghold for endangered fish recovery amidst aridification, inevitable dead pool conditions, and a warm Colorado River through Grand Canyon. Reclamation and its sister agencies must ensure that the Colorado River through Grand Canyon remains relatively free of nonnative warm water invasive fish. The Colorado River through Grand Canyon is unique in the CRB for its relative lack of non-native warm-water fish. These fish, like smallmouth bass, catfish, and other species, pose a pronounced, ongoing threat to endangered fish that overwhelms and negates the provision of adequate habitat conditions. Thus, the lack of nonnative warm water fish in the Colorado River through Grand Canyon creates a unique opportunity for endangered fish recovery in Grand Canyon, where: (1) together, the downstream fish barrier that Pearce Ferry may provide and an upstream barrier at the current site of Glen Canyon Dam, can provide for ongoing exclusion nonnative warm water fish from the Grand Canyon, and (2) in the relative absence of nonnative warm water fish, endangered fish may flourish in the Colorado River throughout all of Grand Canyon as aridification continues and the river warms, as has occurred in recent years in western Grand Canyon. Given the climate inevitability of Glen Canyon Dam's obsolescence, Reclamation and its sister agencies must analyze in the context of this EIS and its accompanying Biological Opinion bypass and other post-dam river management systems at the current site of Glen Canyon Dam that, across alternatives, prevent passage of non-native fish downstream into the Colorado River through Grand Canyon to ensure the survival and recovery of endangered fish. Conversely, Reclamation's failure to prevent non-native fish invasion amidst a warming Colorado River through Grand Canyon will jeopardize endangered species like humpback chub.	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	9	WILD - Wildlife	BOR must consider current and ongoing effects of the lack of screens or other dam modifications to prevent passage of non- native fish through Glen Canyon Dam into the Colorado River and Grand Canyon. Reclamation's operation of Glen Canyon Dam absent screens or other barriers to prevent non-native fish passage through the dam and into the Colorado River in Grand Canyon is discretionary action because the Bureau and the U.S. Fish and Wildlife Service have, since at least 2016 (1) been aware of the potential for non-native fish to pass through Glen Canyon Dam and into the Colorado River and designated critical habitat for humpback chub, particularly as the result of aridification and declining Lake Powell surface elevations, and (2) been aware and discussed the need to implement screens or other barriers on Glen Canyon Dam to prevent passage of non-native warm water fish into the Colorado River and designated critical habitat for humpback chub. The EIS must fully consider the need for screens under all operations scenarios as well as a decommissioning alternative (as detailed below).	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20899	11	WILD - Wildlife	BOR, FWS, and NPS must analyze, monitor, and plan for the survival and recovery of threatened and endangered species occupying and/or re-occupying newly emergent portions of Glen Canyon and its tributaries. As aridification continues and Lake Powell recedes, rapid recovery of newly emergent canyon-bottom riparian habitats and their associated aquatic ecosystems will be occupied and re-occupied by threatened and endangered species. The EIS and Biological Opinion must therefore analyze and provide for the survival and recovery of threatened and endangered species re-occupying newly emergent portions of Glen Canyon. Federal agencies should therein set forth plans for monitoring, detecting, and managing threatened and endangered species as they re-occupy newly emergent portions of Glen Canyon and its tributaries. The EIS and Biological Opinion should prohibit re-submersion of habitats newly occupied by threatened and endangered species	Save the Colorado; Glen Canyon Institute; Living Rivers; Center for Biological Diversity; Great Basin Water Network; River Runners for Wilderness; Las Vegas Water Defender; Utah Rivers Council; Waterkeeper Alliance	Gary Wockner; Eric Balken; John Weisheit; Taylor McKinnon; Kyle Roerink; Tom Martin; Tick Segerblom; Zach Frankel; Kate Hudson
20913	21	WILD - Wildlife	Reclamation must plan and manage for Endangered Species Act compliance not just in Grand Canyon national park, but for Glen Canyon National Recreation Area. With thus far minimal species monitoring in the "restoration zone" of GCNRA (above reservoir level and below 3,700), the extensive emerging ecosystems could provide habitat for threatened and endangered species, something that was highlighted in the Draft SEIS48, which stated,"Declining lake levels would likely expand or increase habitat for Colorado pikeminnow, razorback sucker, flannelmouth sucker, and bluehead sucker in the inflows to Lake Powell as riverine habitat would increase in the San Juan River and Colorado River inflows." Additionally, a Mexican Spotted Owl (threatened species) was seen in an emerged side canyon in GCNRA in 2022	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard

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20913	24	WILD - Wildlife	New Wildlife Habitat The DSEIS also erroneously claims the emerging vegetation is harming wildlife. This couldn't be further from the truth. Abundant wildlife has been documented in emerged canyons of Glen Canyon including bighorn sheep, mule deer, coyote, bobcat, beaver, river otter, numerous birds, lizards and snakes61. Dozens of invertebrate species such as bees, beetles, and dragonflies have also been documented in the emerged areas62. These emerging landscapes provide native species the ability to compete with non-native species and to add to the ecological integrity of the Colorado River system. They may also be providing streamside habitat for threatened or endangered species such as the Willow Flycatcher or Yellow Billed Cuckoo. The western United States has lost thousands of acres of habitat for native species due to various forms of development and use. Recognizing Glen Canyon's unique place in the landscape for both human and non-human species must be considered in the analysis of the new operational guidelines.	Glen Canyon Institute; Living Rivers; Great Basin Water Network; Utah Rivers Council; Returning Rapids Project; National Parks Conservation Association	Eric Balken; John Weisheit; Kyle Roerink; Zach Frankel; Mike DeHoff; Erika Pollard
20943	1	WILD - Wildlife	I have been lucky enough to visit many of the well known and lesser known side cantons of Glen Canyon as it emerged from under Lake Powell over the last years. In that time, I have witnessed a miracle taking place Â— a silver lining in these drought-stricken times. On its own according, an unprecedented re-wilding has been taking place in the stone labyrinth that is Glen Canyon. I have seen beaver return, making ponds that support rare and endemic fish and amphibians. Mountain lion and bobcat tracks hint of a larger recovering food chain.		Max Lowe
20952	26	WILD - Wildlife	In the Draft EIS, the EPA recommends that Reclamation identify all proposed/candidate and listed threatened and endangered species and critical habitat (final or proposed) that might occur within the project area. Identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Consider operational releases that prioritize flows during critical times for biological processes and meet critical flow needs for both ESA-listed species and habitats.	Environmental Protection Agency Region IX	Robin Truitt
20957	4	WILD - Wildlife	The geography of Grand Canyon creates both opportunities for and challenges to protecting native fish species. Tributaries, many of which have retained their natural hydrography, water quality, and temperature regimes, remain as refugia for native fish and their food bases, including threatened species.11 Lowered reservoir levels revealed more than 100km of aquatic habitat upstream of Lake Mead that is protected from most non-native fish invasions by Pearce Ferry Rapid, enabling western Grand Canyon to become "a rare contemporary example of native fish populations regaining dominance over invasive fishes in the desert southwest."12 Simultaneously, lower reservoir levels above Glen Canyon Dam are allowing warmer waters into the CRE in Grand Canyon that benefit both native fish and warm water exotic species; unfortunately, warm water exotic species such as smallmouth bass (Micropterus dolomieu) are colonizing Grand Canyon and could greatly reduce native fish populations if they take hold.13 [see letter attachment for list of references] Experimentation, monitoring, and modelling reveal a number of factors that will optimize conditions for Grand Canyon's native fish assemblage. Maintaining a barrier to non-native fish migration at Pearce Ferry, preventing non-native fish from moving through Glen Canyon Dam, preserving natural flow regimes in tributaries, restoring a flow regime based upon pre-dam conditions in the mainstem, and protecting a Colorado River temperature that is too cold to allow warm water exotic species establishment in tributary streams are all essential to the CRE.14	Sierra Club Grand Canyon	Alicyn Gitlin
20957	10	WILD - Wildlife	Recommendation: As part of this process, BOR should implement screening upstream of Glen Canyon Dam to prevent future exotic species passage through the dam.	Sierra Club Grand Canyon	Alicyn Gitlin
20957	11	WILD - Wildlife	At least 13, and up to 22, animal species have been extirpated from the Colorado River ecosystem since Glen Canyon Dam closed in 19635, and non-native plant species are now prevalent in riparian habitats (at one time the razorback sucker was thought to be extirpated but it has since been found in newly exposed river segments above Lake Mead). Three of eight native main stem fish (Colorado pikeminnow, bonytail chub, roundtail chub) have been extirpated from Grand Canyon and four more (humpback chub, razorback sucker, flannelmouth sucker, and bluehead sucker) require intensive management to avoid serious decline.6 Changes in all aspects of the natural flood regime threaten the survival of riparian and aquatic species: flow magnitude, frequency, duration, timing, and rate of change across hourly to century scales7. The effects of this problem were recognized decades ago, leading to the passage of GCPA.	Sierra Club Grand Canyon	Alicyn Gitlin
20965	6	WILD - Wildlife	An accelerated increase in salinity to where only halophytic algae, bacteria and perhaps some aquatic invertebrates could survive. The federally endangered Desert Pupfish and largely collapsed population of Mozambique tilapia will be completely decimated in the lake. The loss of the fishery will have disastrous consequences for piscivorous (fish-eating) birds that rely on the Salton Sea. California has lost roughly 90% of the wetlands that sustained wildlife before the 19th and 20th Century (Reference 5). The Salton Sea filled part of that gap, until recently sustaining millions of fish and over 400 species of birds. It is imperative to preserve the Pacific Flyway and protect the unique biodiversity of the Salton Sea ecosystem. Ensuring the piscivorous birds have a sustainable food source and deep-water habitat must be a priority at the Salton Sea.	The EcoMedia Compass	Andrew McDonagh
20970	2	WILD - Wildlife	And secondly, every effort should be made to: * protect, restore and enhance native fisheries, and target non-natives for reduction and/or elimination;		Jeanne Evenden

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20973	4	WILD - Wildlife	For Reclamation and the Service to accomplish an appropriate effects analysis for this EIS in compliance with the ESA, we will need summary information that has not previously been formatted for this purpose. Much data has been collected while implementing the 2007 operational guidelines for Lake Powell and Lake Mead and an analysis of that data and trends should be included in Reclamation's evaluations. It is important to note here that the effects analysis must consider the full range and breadth of effects to ESA listed species and designated critical habitat (the ESA action area) where effects occur throughout the Colorado River basin.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	5	WILD - Wildlife	For each species, an evaluation of baseline conditions will be required, which will include (but would not be limited to) providing the most recent demographic (i.e., survey data, population estimates, distribution, etc.) and habitat conditions (i.e., extent, quality, quantity, etc.). This baseline would need to precisely indicate how the geography of the EIS and the actions taken would overlap with the geography of each species. The recent SEIS to develop near-term Colorado River operation options and address extreme drought conditions during the 2024-2026 timeframe did not update the baseline information for any of the federally listed species and instead relied on the historic baseline as described in the 2005 LCR MSCP Biological/Conference Opinion and the 2007 Interim Guidelines. As this post-2026 NEPA process will revisit all sections of the 2007 Interim Guidelines and other domestic operating agreements to guide operations in a wide range of future conditions beyond 2026; it is necessary that baseline information be updated. The updated baseline condition should include current LiDAR habitat analyses and compare current habitat conditions to known habitat conditions in 2005 and 2007. This data will help us assess the efficacy of conservation measures to date.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	6	WILD - Wildlife	Updated baseline condition analysis also needs to reflect current demographic conditions as reviewed in Species Status Assessments and Recovery Plans and should include analyses of affects both to the species range wide as well as to individual units. For species, such as the Humpback Chub (Gila cypha), that are currently undergoing a revised Species Status Assessment, the Service will provide Reclamation with up-to-date information prior to the assessment being published, as appropriate.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	8	WILD - Wildlife	Please provide predicted water velocity, daily and monthly flow, water temperature, and habitat loss for all the scenarios presented. These predictive models should then be mapped onto the baseline conditional data for each species impact to determine how these changes may affect the species, habitats, and any designated critical habitat.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	9	WILD - Wildlife	Analysis of hydrologic conditions and proposed guidelines on water delivery to existing and any proposed conservation areas. This analysis should consider and explain any assurances of water delivery to conservation areas regardless of water agreements and river conditions. These conservation areas are critical to the continued persistence, reproduction, and recruitment of many federally listed species.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	10	WILD - Wildlife	Anticipated lake elevations at Lake Mead and Lake Powell under all proposed scenarios, identifying any potential affects at current natural barriers or landmarks (e.g., the inflow areas to both Lakes and/or large rapids serving as natural barriers). This aspect of analysis is important, as drought conditions have persisted in the basin during the last twenty years, and many locations that are now riverine have the potential to become lacustrine environments. Analyses should also consider effects to tributaries along the main stem Colorado River, including elevations, temperatures, and natural fish barriers such as rapids. Should post-2026 planning be to elevate the reservoirs to full capacity there will be an associated loss of native fish habitat, and incidentally, take of federally listed species that have re-occupied riverine habitats.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	11	WILD - Wildlife	Further analyses of how reservoir water levels impact dam released water temperatures are recommended. Please also include modeling downstream anticipated water temperatures associated with reduced flows. Increased river temperatures favor warm water non-native fish, and it is critical for our federally listed native fish to address those impacts. Please include any proposals for excluding and removing non-native fish from the Grand Canyon reaches as well as a long-term analysis of impacts of those proposed methods.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20973	14	WILD - Wildlife	Please ensure models also examine and predict how water reductions will affect the amount of water draining from Imperial Irrigation District and Coachella Valley Water District irrigation drains. The analysis should include the location and acreages of existing marshes at the end of those drains and how water reductions may change the size and location of the marshes and how that could impact resident Desert pupfish (Cyprinodon macularius) and Yuma Ridgway's rail (Rallus obsoletus yumanensis) as existing marsh areas dry.	US Fish and Wildlife Service; US Fish and Wildlife Service	Deborah Williams; Jonna Polk
20996	3	WILD - Wildlife	Higher water temperatures coming through Glen Canyon Dam and the increased risk of fish entrainment due to low reservoir elevations are the driving factors for establishment of SMB and other high risk non-native fish species downstream of the dam. Although these factors are a result of the existing water conditions within the Colorado River basin, both release temperature and entrainment can be influenced and managed by operations at Glen Canyon Dam. The Department requests that Reclamation develop a full suite of alternative operations and infrastructure enhancements that disadvantage high risk non-native species and reduce their establishment potential. This will help protect healthy self-sustaining native fish populations in Marble and Grand Canyons.	Arizona Game and Fish Department	Luke Thompson

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20996	15	WILD - Wildlife	Current conditions, and projected future water level will prohibit effective management of the Rainbow Trout fishery and high risk non-native species within the Colorado River. Intermittent use of the bypass tube has been previously proposed through the GCDAMP and the Department recommends this be considered for implementation. Infrastructure changes that facilitate long-term release temperature control while minimizing water storage or power loss could also be explored (e.g., power generation in the bypass tube, temperature control tower feeding penstocks). The Department also recommends Reclamation identify fish deterrents or exclusion mechanisms in the forebay in order to reduce entrainment of warmwater high risk non-native fish through the dam.	Arizona Game and Fish Department	Luke Thompson
21035	1	WILD - Wildlife	I am writing to urge that the protection of water sources for crucial wildlife habitat is also taken into consideration. The Colorado Sun reports that â€œthe banks of the Colorado River support about 65% of the species in the West, which include many endangered species.â€ This percentage includes 400 different bird species along the Lower Colorado River. More disruption to their habitat seriously threatens the biodiversity of this region. In particular, I hope you will consider habitats in the Grand Canyon, the Lower Colorado River (Multi-Species Conservation Program), the Salton Sea, and wetlands in the Colorado River Delta. These areas are important migration stopovers that birds depend on in their annual travels. As climate change destabilizes the Colorado River system, I urge Reclamation to identify how important environmental resources will change and invest in solutions--including available federal funding--to help ensure these habitats continue to support the birds and other wildlife that live in them.		Rachel Kapelle
21038	1	WILD - Wildlife	We support Reclamation's efforts, alongside efforts from the Basin States and Mexico, to develop Colorado River management post-2026 that increases the reliability of water supplies and improves resilience of the Colorado River Basin in the face of climate change. While we do not wish to weigh in on how water use reductions should be allocated, we do have concerns about the potential impacts of Colorado River management and water use reductions in the United States to important resources in the Colorado River Delta in Mexico. These impacts have implications for wildlife that depend on what little habitat remains in the Colorado River Delta, which has been preserved and restored on the strength of the collaborative relationship that has been established between the United States and Mexico on the Colorado River in recent years.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21038	8	WILD - Wildlife	The Cienega de Santa Clara is the largest remaining wetland in the mostly desiccated Colorado River Delta, and Mexico has given it protected status with designation as a Biosphere Reserve. Hundreds of thousands of waterbirds use the Cienega as winter habitat, and it supports 75% of all Yuma Ridgway's Rails, an endangered bird that hides in the reeds. While the Cienega de Santa Clara is located in Mexico, it receives some 90% of its inflows from a canal that transports Colorado River water first used to irrigated farms in the region of Yuma, AZ. Reclamation's post-2026 action alternatives may result in water use reductions at those irrigated farms in Yuma, leading to reduced water in the canal flowing to the wetlands and the birds that depend on them.	Sonoran Institute; National Audubon Society; Pronatura Noroeste; Redford Center; Restauremos el Colorado; The Nature Conservancy	John Shepard; Jennifer Pit; Miguel Vargas; Lynne Bairstow; Carlos de la Parra; Nirari Cardenas
21066	5	WILD - Wildlife	Here are some good reasons for keeping a sustainable water level in Lake Powell: * Prevent any more non-native Smallmouth Bass from slipping from Powell through the Dam and entering the Grand Canyon. Water kept at a higher level will prevent this.		Tiffany Mapel
21169	4	WILD - Wildlife	The Tribe is concerned that the efforts to prevent Smallmouth Bass from spawning below Glen Canyon Dam may result in driving Smallmouth Bass into warmer, tributary waters of the Colorado River such as Havasu Creek where the Smallmouth Bass can establish and threaten the Humpback Chub. The potential for such a scenario, and associated conservation efforts, must be addressed in the DEIS. CLOSING COMMENTS	Havasupai Tribe	Thomas Siyuja