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Letter #: 502

Date Received: 2/24/2026

Sender Names: 492: Karen Naiman

Emails: 492: klnaiman@earthlink.net

Organizations:

Subject: A better future for the Colorado River

DOI - . Dear Bureau of Land Mangement The U.S. Bureau of Reclamation needs to combine elements from the proposed alternatives in the Draft Environmental Impact Statement to ensure a sustainable future for the Colorado River with new, long-term guidelines that: -Provide clarity and predictability as continued crisis management puts everything and everyone in the basin at risk, guidelines must promote conservation and respond to conditions on the ground; -Incorporate flexible, adaptive tools for conserving, storing and managing water, so new guidelines must allow for more flexibility in how water is stored and moved to protect and stabilize the system; -Embed environmental stewardship, because the Colorado River is more than a plumbing system, so new guidelines must account for the river itself and the bounty of life it sustains; -Provides for meaningful and voluntary Tribal participation grounded in sovereignty and self-determination, so the 30 federally recognized Tribes in the Basin must be included in decision-making; and -Preserve pathways for advancing in-basin mitigation and continued binational cooperation with Mexico. Sincerely, Karen Naiman 1205 S Valentia Court Denver, CO 80247 klnaiman@earthlink.net

Letter #: 8229

Date Received: 3/2/2026

Sender Names: 8152: kathy nelms

Emails: 8152: nkathy2143@msn.com

Organizations:

Subject: Salt River Project public comment

DOI - . I live in Arizona and realized we have a lower standing on the distribution line but Arizona and the other "lower" basin states have cut their water use and the upper basin states have not. To me some consideration from the upper basin states could be forth coming and fairer in the over all needs. Thank you for your consideration, Kathy Nelms

Letter #: 5468

Date Received: 2/28/2026

Sender Names: 5432: Jon Nelson

Emails: 5432: nelsonjonk@hotmail.com

Organizations:

Subject: Our Drinking Water Is at Risk — Strengthen the Post-2026 Colorado River Plan

DOI - . Dear Bureau of Reclamation Officials,I am writing to express deep concern about the Draft Environmental Impact Statement (EIS) for Post-2026 management of the Colorado River Basin. Our drinking water is at risk, and the Draft EIS fails to meet the urgency of this moment.The Colorado River is already overallocated and shrinking due to decades of unsustainable management and accelerating climate impacts. It provides drinking water for 40 million people, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems. Yet today the Basin faces record-low reservoir levels, rising salinity and pollution risks, collapsing aquatic habitats, reduced snowpack, and growing threats to safe and reliable water supplies.The Draft EIS does not adequately address this crisis. Most concerning, the Bureau has failed to clearly identify its legally required preferred alternative, denying Tribes, impacted communities, and the public a meaningful opportunity to comment on the actual proposal the agency intends to advance. Waiting to reveal a preferred alternative until the final decision effectively silences public input at the most critical stage.This process must reflect the full reality of climate-driven water scarcity. Incremental adjustments and business-as-usual approaches will only lock in further environmental decline and water insecurity.I urge the Bureau of Reclamation to significantly strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution risks as flows declinePreventing further ecological collapse in the Colorado River Basin and DeltaRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing enforceable demand reductions and conservation over unsustainable allocationsThe Colorado River's future depends on bold, decisive action -- not delay or inadequate planning. The Bureau has an obligation and an opportunity to protect clean water, communities, and ecosystems for generations to come.I respectfully urge you to revise the Draft EIS, clearly identify your preferred alternative, and provide the public with a full and fair opportunity to comment before issuing any final decision.The Colorado River cannot afford delay. Please act now to protect our drinking water and the future of the Basin.Sincerely,Jon K NelsonSaugerties, NY

Letter #: 7693

Date Received: 3/2/2026

Sender Names: 7639: Keith Nelson

Emails: 7639: watercress1123@gmail.com

Organizations:

Subject: What is the long-term risk of the Colorado River not supplying CAP water?

DOI - . Thank you for soliciting comments on the future management of the Colorado River. To make informed, long-term decisions about the management of Colorado River water, it is imperative that Colorado River stakeholders be presented with the actual risks of losing CAP water supplies over long-term periods. If the risk of losing long-term CAP water supplies is significant, the public needs to be so informed. The BOR's 24 and 60 month projections are not true probabilistic models. Post-audits indicate that deterministic models do not provide effective, long-term guidance for the management of Colorado River water supplies. Furthermore, deterministic models have limited flexibility to explore alternative supply and demand strategies, including evaluating the risk of "dry" outliers, etc. Another long-term concern is the transition to a non-stationarity regime, outside of calibration range. Historically, Colorado River flows at Lees Ferry have been subject to significant internal variability, ranging from less than 6 million acre-feet/year (1977) to greater than 25 million acre-feet/year (1984). The future availability of Colorado River water represents a form of uncertainty that cannot be reduced, known as aleatoric uncertainty. In addition, data is increasingly showing that climate change is modifying river flows, suggesting the system is transitioning out of long-term stationarity into a drier regime. There is also epistemic uncertainty associated with the deterministic portions of any planning model. Additionally, parameters and boundary conditions may be subject to future, unforeseen changes "outside" calibration periods. For example, future groundwater pumping adjacent to - but in direct hydraulic connection with - the Colorado River may capture streamflow, and consequently reduce downstream water supplies, similar to what has happened along the Gila River. Informed decisions about the long-term management of the Colorado River water cannot be made without quantifying the long-term risks, especially in the Lower Basin States. Since we can't control the river's highly variable flow - but can control demand, probabilistic modeling must be used to provide insight into long-term water supply risks. Using probabilistic modeling techniques and data from Lee's Ferry between 1906 and 2005, Barnett and Pierce (2008; 2009) found that Lake Mead was already subject to long-term water supply risks prior to climate change and, prophetically, indicated that 2 million acre-feet/year of demand would need to be eliminated to reduce low flow risks under some climate change scenarios. Subsequent analysis by Gold et al., (2024) and Wang et al., (2025), generally corroborate the findings of Barnett and Pierce. If data from the last two "dry" decades (2006-2025) was included in statistical resampling of ensembles, the risks would, obviously, be even greater today. Accordingly, risk analysis ensembles (stochastic modeling, Markov updating, etc), each consisting of hundreds or thousands of synthetic realizations, can provide a much fuller and more honest description of long-term water risks for Arizona stakeholders. [By analogy, if a MLB team wanted to sign a lead-off hitter who bats at least 300, informed scouts would base their decision on thousands of "at-bats", consistent with a stochastic approach. An informed baseball recruiter would never base a decision on a single "at-bat" in the year 1922. (Of course, this would not apply to the 1919 Chicago White Sox.)]. Therefore, can the BOR please provide the long-term* CAP delivery rate that can be supplied with a 99% confidence level using the most recent initial conditions? *50 years. Can the BOR please calculate the risk of lower basin states not accruing 75 million acre-feet in a 10 year period (using the most recent initial conditions)? Can the BOR please calculate the risk of lower basin states not accruing 150 million acre-feet in a 20 year period (using the most recent initial conditions...this will give us a different read, attenuating the effect of initial conditions), [Alternative *demand rates, **risk thresholds and ***cumulative volumes over specified periods, etc., would all be adjustable parameters, providing ensembles for evaluation of risk. Priorities based on seniority, the cost of water, future water markets, etc., can be established and ranked by degree of acceptable risk. Actuarial tables could be created showing the degree of risk associated with adjusting relevant variables. ---------- Regardless of the water policies that got us here, everyone who pays property tax in central Arizona is entitled to know the long-term risks of losing our CAP water supplies without being behind closed doors. A probabilistic model needs to be developed, and results disseminated to the general public for review, because it's better to know what you don't know, than not

Letter #: 227

Date Received: 1/29/2026

Sender Names: 228: Ken Neubaker

Emails: Not Provided

Organizations:

Subject: CR DEIS Public Meeting Comments

I noticed the, shortage, maximum shortages in the maximum flexibility alternative is 4 million acre-feet, whereas in the supply-driven alternative, it's 2.1 million acre-feet, andI'm curious why that discrepancy? You know, that's almost 2 million acre-feet between the two and it just seems sort of odd that there isn't sort of a consistency in shortage maximum shortage requirements. Regarding the geographic scope: A couple of the alternatives look at releases from the upstream dams above Chipsum Canyon, like Flaming Gorge and Blue Mesa and Navajo, there's no look at the impact that those releases would have upstream, and I don't know if those would require a separate EIS, or if those are going to be considered. That would have impacts on the reservoirs, the people, and communities below those reservoirs.

know what you don't know. Thank you in advance for providing the risk-based information needed to make informed, objective decisions about the management of the Colorado River and CAP water supplies. Sincerely, Keith Nelson _____ References Barnett and Pierce, 2008. When will Lake Mead go dry? WRR, v44, issue3. Barnett and Pierce, 2009. Sustainable water deliveries from the Colorado River in a changing climate. PNAS. Gold et al., 2024,. Exploring the spatially compounding multi-sectoral drought vulnerabilities in Colorado's west slope river basins. Wang et al, 2025, Disentangling climate and policy uncertainties for the Colorado River post-2026 operations.

Letter #: 3626

Date Received: 2/27/2026

Sender Names: 3589: Amaya G. Nicolas

Emails: 3589: agoni@logrono.es

Organizations:

Subject: proteja el río Colorado, no que encierre más escasez de agua

DOI - . El futuro del rio Colorado depende de acciones audaces, no de ajustes incrementales.Necesitamos un marco de gestion que proteja el agua limpia, las comunidades y los ecosistemas para las generaciones venideras. La Oficina tiene la oportunidad de tomar acciones significativas ahora para abordar la realidad completa de la escasez de agua provocada por el clima y la urgente necesidad de proteger la calidad del agua, los ecosistemas y las comunidades de la cuenca.Insto a la Oficina de Reclamacion a fortalecer significativamente el borrador de EIS de la cuenca del rio Colorado posterior a 2026, que aborde de forma proactiva la crisis que enfrentamos y asegure que el publico tenga la oportunidad de comentar su propuesta revisadaantes de emitir su decision final.El rio Colorado ya esta sobreasignado y se esta reduciendo. La Oficina debe priorizar la sostenibilidad a largo plazo, la consulta tribal significativa y reducciones exigibles de la demanda, no simplemente identificar nuevas formas de dividir una oferta en declive.www.logrono.es

Amaya Goni NicolasAdministracion Publica, Interior y Proyectos EstrategicosAyuntamiento de LogronoAvenida de la Paz 11 * 26071 Logrono (La Rioja)941277000 * Ext. 81256AVISO DE CONFIDENCIALIDAD. Este correo electronico y, en su caso, cualquier fichero anexo al mismo contiene informacion de caracter confidencial exclusivamente dirigida a su destinatario o destinatarios. Queda prohibida su divulgacion, copia o distribucion a terceros sin la previa autorizacion escrita del remitente. En el caso de haber recibido este correo electronico por error, se ruega notificar inmediatamente esta circunstancia mediante reenvio a la direccion electronica del remitente.Antes de imprimir este mensaje, asegurese de que es necesario. El Medio Ambiente esta en nuestras manos.

Letter #: 2896

Date Received: 2/25/2026

Sender Names: 2868: Jonathan Nielsen

Emails: 2868: braveorange@protonmail.com

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I'm with the many thousands of others that support the restoration of Glen Canyon and a healthy Colorado River in the new guidelines. I'm writing/typing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as itignores options that would provide both operational flexibility AND environmental benefits. Specifically, the new Colorado River guidelines must: - Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly and harmfully limits options for the river, its users, and its ecosystems. - Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology cannot fill either Lake Mead and Lake Powell - this is a fact and won't be changing. Everythig is moving in one direction only and will continue to do so. Given this reality, it doesn't make sense to continue drowning national park-caliber canyons. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin. - Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like the Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin. - Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights. Thank you for your consideration of this position. - Jonathan Nielsen, geographer in Sanpete County, Utah

Letter #: 22

Date Received: 1/16/2026

Sender Names: 21: Shane Norris

Emails: 21: shane.norris@comcast.net

Organizations:

Subject: Colorado River

DOI - . Fill the reservoirs and then let snow totals dictate release amounts year to year. Basically use it like a regular person's checking account, if there isn't any income then there's no spending, crazy concept for the government I know, but it works. Sent via the Samsung Galaxy XCover6 Pro, an AT&T 5G smartphone

Letter #: 3904

Date Received: 2/26/2026

Sender Names: 3863: Todd O

Emails: 3863: tolk836@gmail.com

Organizations:

Subject: Draft EIS

DOI - . Bureau of Reclamation,Hello. The Solutions We NeedWe urge the Bureau of Reclamation to strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocationsThank you, Todd OlkConcerned US citizen

Letter #: 27

Date Received: 1/10/2026

Sender Names: 25: Patrick OBrien

Emails: 25: techsent@sonic.net

Organizations:

Subject: New Proposal for Colorado River Post 2026 Operations

DOI - .Colorado River Basin,An alternative solution to alleviate the burden of available water amongall 7 states is to build a water pipeline from Idaho or Oregon down intoCalifornia where the water can be distributed to Southern California,Nevada and Arizona. This second separate water source will satisfy thedemands in these three states and further remove the dependance of waterfrom the Colorado River. The projected timeline for project completionis 5 years.In closing, this alternative water distribution project proposal willpermanently re-shape the West Coast available water reclamationoperations thus simultaneously produce water autonomy for the remaining4 states in the decades to come.Thank you,Patrick O'Brien

Letter #: 7034

Date Received: 2/28/2026

Sender Names: 7002: Kevin ODonnell

Emails: 7002: kodonnell1902@gmail.com

Organizations:

Subject: Public comment re BR Draft Environmental impact post 2026 guidelines for Lake Powell and Lake Meade

DOI - . Hello Bureau of Reclamation:The model used references 2022 and 2011 capacities of Lake Powell and Lake Meade. The base references aretoo outdated for the model to be actionable or to suggest alternatives.Even if base references were current, all the model is doing is to extrapolate "relationship curves."The question neither asked nor answered, is what does the Western United States of America do when Lake Powell andLake Meade are functionally dry.In Southern Nevada, master plans to build hundreds of thousands of more homes are on the boards. Local governmentthrough their elected representatives are pressing the federal government to release federal lands to build houses on,and solve the "housing crisis."Where is the water going to come from for hundreds of thousands of new homes when the existing housing stock,commercialand industrial activity of Southern Nevada is doing its share to drop the level of Lake Powell and of Lake Meade by 2 to 3% a year.Let me suggest an historical picture of what is going on. We know that 10,000 years ago there was vibrant human activityin Lake Geneva Switzerland. Today the city of Lake Geneva thrives. We also know that in the area of Mesa Verde in our ownSouthwest, 10,000 years ago there was a thriving city. Today, there is no human habitation, other than ruins that are visited by tourists.The difference of course is WATER.No more outdated models please. Let's build some desalination plants, and the sooner the better.Kevin O'DonnellLas Vegas, NV(702) 290-4858

Letter #: 866

Date Received: 2/25/2026

Sender Names: 856: Phyllis Odaniels

Emails: 856: odaniels@graceland.edu

Organizations:

Subject: Please support a smarter future for the Colorado River, and all who depend on it!

DOI - . Dear Bureau of Land Mangement As a college environmental educator I have long stressed the importance of this "non-renewable" resource. Our reckless use of water is based on the assumption that clean, drinkable water will always be available. We know for sure that this is no longer safe thinking. Increases in development such as big data centers, mining and continued population increases, especially in areas where water resources are decreasing, is unwise. Conservation by everyone, individuals, businesses, cities, housing developments and others is essential. I am writing to encourage the Bureau of Reclamation to combine elements from the proposed alternatives in the draft Environmental Impact Statement (DEIS) to ensure a sustainable future for the Colorado River with new, long-term guidelines that: - Provide clarity and predictability: continued crisis management puts everything and everyone in the basin at risk. New guidelines must promote conservation and respond to conditions on the ground - Incorporate flexible, adaptive tools for conserving, storing, and managing water: new guidelines must allow for more flexibility in how water is stored and moved to protect and stabilize the system - Embed environmental stewardship: the Colorado River is more than a plumbing system. New guidelines must account for the river itself and the bounty of life it sustains. - Provides for meaningful and voluntary Tribal participation grounded in sovereignty and self-determination: the 30 federally recognized Tribes in the Basin must be included in decision-making. - And preserve pathways for advancing in-basin mitigation and continued binational cooperation with Mexico Thank you for your effort in this very important area of life! Phyllis O'Daniels Creston, Iowa Sincerely, Phyllis Odaniels 1204 N Cedar St Creston, IA 50801-1811 odaniels@graceland.edu

Letter #: 3225

Date Received: 2/27/2026

Sender Names: 3195: Nancy Ogden

Emails: 3195: verdnan23@gmail.com

Organizations:

Subject: Water Crisis

DOI - . The Draft EIS lays out several possible approaches, but does not clearly identify which recommendation is the "preferred alternative,"which it is legally required to do. Furthermore, the alternatives the agency has proposed are inadequate to meet the crisis that the system faces.I urge the Bureau to put forward its "preferred alternative" and give Tribes, impacted communities, and the public a meaningful chance to comment on its recommendation before a final decision is made. If the Bureau does not include its "preferred alternative" in its Draft EIS and waits to do so in its final action, the public will have no opportunity to comment on the actual proposal the Bureau recommends. Do the right thing in view of climate changes and the people impacted.Sincerely, Nancy B. Ogden

Letter #: 3537

Date Received: 2/27/2026

Sender Names: 3504: omid1941@olypen.com

Emails: 3504: omid1941@olypen.com

Organizations:

Subject: Try Conservation AMERIC

DOI - . What America and Americans need to learn is there are limits to things and folk need to be considerate of the natural environment and conserve. With the present bunch of the Epstein class ruling it is highly unlikely any social or governmental change will occur. But that is what is need. Otherwise abuse and die, SUCKERS.J. Zey

Letter #: 23

Date Received: 1/14/2026

Sender Names: 22: Gerald Orcholski

Emails: 22: gerryjim@sbcglobal.net

Organizations:

Subject: Colorado River Water

DOI - . The U.S. Bureau of Reclmation Report does not mention human-caused climate change from fossil fuels. That must be in any draft report since it is the major cause of the Colorado River's low levels. The Trump Administration keeps human-caused climate change out of the report, because they strongly supports the use of fossil fuels. Not addressing the issue, makes the solutions to the problem, incomplete.Gerald OrcholskiPasadena, CA 91104

Letter #: 402

Date Received: 2/23/2026

Sender Names: 653: Michael Orpi

Emails: Not Provided

Organizations:

Subject:

My name is Michael Orpi. I'm up here on the Upper Colorado River Basin. I'm up here in Colorado, western Colorado. I'm on the north fork of the Denison River. And I would like to have an interstate permit, but they won't allow me to do that. The Upper Colorado River will not. The Colorado and Utah will not let me have an interstate permit. And, I have, approximately 1,800 acre-feet of water to lease during farming season, which is April 1st. till October 30th. It's under the law of the river. It's called demand management. I have Pre, compact. It's 1883-1901 water decree. It's also registered in the courts. And also, it's on my property deed. I'm looking for a long-term lease. My normal water is 1,25,6340 acre-feet, flowing every 24 hours, but I want to lease 1,800 acre-feet flowing every 24 hours. Need an application, or something, want to have my water for the generation of power at Lake Powell and Lake Mead. Please call me back at 970-629-5227, or email me at olambchop66@gmail.com. Thank you. Bye-bye.

Letter #: 416

Date Received: 2/18/2026

Sender Names: 410: Steven Oscherwitz

Emails: 410: ggggur@gmail.com

Organizations:

Subject: Divide responsibilty - Colorado River water situation

DOI - . The 1922 Colorado River Compact will be impossible to continue due to less flow / climate change. Please make sure that both upper and lower basin states share equally in any future mandated cuts to water use.Sincerely,Steven OscherwitzTucson, Arizona

Letter #: 8194

Date Received: 3/2/2026

Sender Names: 8118: Tracey P

Emails: 8118: tdyerpeterson@gmail.com

Organizations:

Subject: Arizona Native - Too Significant % of Water Loss Colorado River Basin upcoming vote)

DOI - . To Whom it May Concern: I am reaching out to plead with the Bureau of Reclamation to reduce Arizona's % reduction, a state that is desert cannot lose access to such a significant percentage of our water. Water is critical to our land and the people who live in the desert. Thank you, Tracey & Bryan Peterson

Letter #: 827

Date Received: 2/24/2026

Sender Names: 817: Kenneth Pape

Emails: 817: k.pape@hotmail.com

Organizations:

Subject: Please support a smarter future for the Colorado River, and all who depend on it!

DOI - . Dear Bureau of Land Mangement The Bureau of Reclamation should combine elements from the proposed alternatives in the draft Environmental Impact Statement (DEIS) to ensure a sustainable future for the Colorado River in the absence of the basin states reaching a comprehensive conclusion. The result should provide clarity and predictability not continued crisis management. New guidelines must promote conservation, incorporate a plan for conserving and managing water, provide for meaningful Tribal participation by the 30 federally recognized Tribes in the Basin, continue advancing binational cooperation with Mexico. Sincerely, Kenneth Pape 16626 Jean Lafitte Road Jamaica Beach, TX 77554 k.pape@hotmail.com

Letter #: 8403

Date Received: 3/2/2026

Sender Names: 8317: Jane Pargiter

Emails: 8317: jane@ecoflight.org

Organizations:

Subject: Draft Environmental Impact Statement comment and offer of the aerial perspective

DOI - . Dear Acting Commissioner Cameron, I have lived in the Colorado Basin for 37 years, and in my role as ED of EcoFlight and as a volunteer citizen have worked on keeping the basin and the water flowing through the Colorado system as healthy as possible. As an individual I work to conserve as much water as possible on a daily basis and encourage others to do the same. As a conservationist, I encourage you to strongly consider creative strategies to protect this oversubscribed river. Not only is the Colorado no longer a large and mighty river when compared with most rivers around the globe that service over 40 million people, it is not protected in any way to guarantee its future. I not only offer our services as an organization to assist you in the aerial perspective (as we did with Commissioner Touton and Deputy Secretary Touton) but also in creative solutions to help manage this river for the future. I also think some of our best water conservationists in the basin are the Tribes who have learned to use much less water than their 'white' counterparts. We need to honor their dedication to preserving this sacred and beautiful river instead of penalizing their use. Thanks for reading my comments and look forward to hearing back from you, Jane Jane Pargiter | Executive Director she/hers/her Understanding pronouns EcoFlight 307 L AABC, Aspen, CO 81611 T: (970) 429-1110 ext. 1 www.ecoflight.org

Letter #: 4066

Date Received: 2/27/2026

Sender Names: 4021: Tamsin Pargiter

Emails: 4021: tpargiter@gmail.com

Organizations:

Subject: Comments on the Post 2026 Op Guidelines and Strategies for Lake Powell and Lake Mead

DOI - . Dear Mr. Cameron, I grew up in a valley shaped by the Colorado River, eating foods grown from its waters, learning to raft and kayak in its rapids. This river has touched almost every aspect of my life, and I'm grateful for your efforts in protecting it. I understand that the river is complex, dynamic, and interwoven with many aspects of many industries. My hope is that the new water guidelines take into account the following policy considerations: Include flexible water conservation pools to help the Basin increase its water security.Protect river health, thinking of the entire ecosystem. Take a proactive approach to water management. The new guidelines must promote water conservation across the Basin.Honor Tribal sovereignty and fulfill the federal government's legal obligations to Tribal Nations.Thank you for your work on this matter!Tamsin --Tamsin Pargiter970.987.2359

Letter #: 7499

Date Received: 3/2/2026

Sender Names: 7452: Tessa Pargiter-Hatem

Emails: 7452: tessa.pargiter.hatem@gmail.com

Organizations:

Subject: Post 2026 Operational Guidelines and Strategies Colorado River Basin

DOI - . Dear Acting Commissioner Cameron, I am writing to urge you to prioritize the protection of Glen Canyon and the long term health of the Colorado River as new guidelines are developed. This crisis requires collaborative, forward thinking solutions that strengthen water security while protecting ecosystems and communities. The new framework should include flexible water conservation pools and allow water to be stored and moved between Lake Powell and Lake Mead as conditions change. Current programs are insufficient for the West's growing water challenges. Expanded conservation tools and decisions based on actual river flows and basin storage will help stabilize the system, support communities in dry years, and avoid crisis driven management. The guidelines must also protect river health by considering ecological impacts, incorporating drought mitigation, and supporting Colorado River Delta restoration. Equally important, Tribal Nations must be full partners in this process. The 30 federally recognized Tribes in the Basin hold rights to the river's water, and federal policy must honor Tribal sovereignty, trust responsibilities, and meaningful inclusion. Thoughtful, science based, and inclusive guidelines are essential to sustaining this river system for generations. I have grown up recreating on these rivers and hope that future generations will be able to enjoy the raw, natural beauty of them aswell. Thank you for taking the time to read this. Best, Tessa Pargiter-Hatem -- Tessa Pargiter-Hatem (she/her) tessa.pargiter.hatem@gmail.com +1 970-987-2961









Letter #: 6122

Date Received: 3/1/2026

Sender Names: 6095: chuck Parker

Emails: 6095: pchuck48@gmail.com

Organizations:

Subject: Concerning Post 2026 Operational Guidelines & Strategies for Lake Powell and Lake Mead.

DOI - . As a resident of Coachella Valley, I believe that the Salton Sea should be considered part of the Colorado River watershed. The Salton Sea is being forgotten in the Colorado River water negotiations, and it should be factored in because it is creating an environmental disaster that is negatively impacting the environment, health and air quality in my community. I believe that if it continues it will have negative long-term impacts on our economy, specifically property values and tourism and health of residents and visitors.I also advocate for sea water importation and desalinization as a long-term remedy to address Colorado River water shortages and the declining Salton Sea.Please factor in the Salton Sea as part of the Colorado River for any future water allocations and extend the existing agreement for five years until an agreement can be made amongst all states and other remedies can be explored.Thank you for your consideration.Sincerely, Chuck Parker & Felicitas Nunez, Salton Sea Coalition, (760)880-6453

Letter #: 929

Date Received: 2/24/2026

Sender Names: 919: Theresa Parker

Emails: 919: treehead2@hotmail.com

Organizations:

Subject: Please support a smarter future for the Colorado River, and all who depend on it!

DOI - . Dear Bureau of Land Mangement I am writing to encourage the Bureau of Reclamation to combine elements from the proposed alternatives in the draft Environmental Impact Statement (DEIS) to ensure a sustainable future for the Colorado River with new, long-term guidelines that: - Provide clarity and predictability: continued crisis management puts everything and everyone in the basin at risk. New guidelines must promote conservation and respond to conditions on the ground - Incorporate flexible, adaptive tools for conserving, storing, and managing water: new guidelines must allow for more flexibility in how water is stored and moved to protect and stabilize the system - Embed environmental stewardship: the Colorado River is more than a plumbing system. New guidelines must account for the river itself and the bounty of life it sustains. - Provides for meaningful and voluntary Tribal participation grounded in sovereignty and self-determination: the 30 federally recognized Tribes in the Basin must be included in decision-making. - And preserve pathways for advancing in-basin mitigation and continued binational cooperation with Mexico Having been an avid Grand Canyon Backpacker since 1999 and a river runner peep since 2009, I implore that we must protect the Colorado River. Being one of the clearest, cleanest river in the country must be protected. We need to protect the farmlands and the water that assists feeding all of our country. I believe we can continue to the farmers. However, (and I mean a huge but!) Los Angeles proper should not be receiving the Colorado river. This water should be saved and protected for the states that it runs through. California can start desalination and utilize the water they have naturally. California has shown how they disrespect their own water by basically killing Owens Valley that once had plenty of water for the farms and ranches that were there. Since Los Angeles stole their water they barely have grass for the few cattle the valley has managed to keep. Many towns within the Colorado River states rely on the water for both farming and tourism. We need to protect the waterway so it may once again flow all the way to Mexico. In closing, please help keep the waters within the states that the river flows. Other than sustainable farming, discontinue water to California. Keep our river open and flowing. Theresa Parker Lifetime Arizonan Sincerely, Theresa Parker 1389 S VERDE rd Golden Valley, AZ 86413 treehead2@hotmail.com

Letter #: 4007

Date Received: 2/27/2026

Sender Names: 3960: Jason Parsley

Emails: 3960: jasonparsley@yahoo.com

Organizations:

Subject: protect the Colorado River, please!

DOI - . I used to live in Arizona. I feel a personal connection to the Colorado River; it provides drinking water for 40 million people, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems.But the Basin is facing:Record-low reservoir levelsIncreasing salinity and pollution risksCollapsing aquatic habitatsRising temperatures and reduced snowpackGrowing threats to safe, reliable water suppliesThis EIS must reflect the reality of climate-driven water scarcity and prioritize clean water protections, ecosystem health, and equitable solutions, not simply divide up a shrinking supply.The Draft EIS the Bureau has proposed is inadequate to address the crisis that we face, and the agency has failed to reveal what its preferred alternative will be. This denies the public the only real opportunity we will have to comment on the inadequacies of the Bureau's proposal before a final decision is made. We must demand that our communities have a full opportunity to express our concerns before the government takes final action.The Solutions We NeedWe urge the Bureau of Reclamation to strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocations

Letter #: 4374

Date Received: 2/28/2026

Sender Names: 4341: paul

Emails: 4341: psiverson@gmail.com

Organizations:

Subject: Draft EIS Colorado River

DOI - . At some point you are all going to have to wake up and realize that cattle are unsustainable in the West.Get rid of cows and the water crisis is solved!And I'm not just talking about American ranchers, I'm talking about Saudi Arabia who is buying enormous amounts of alfalfa from the California Imperial valley and The Central Arizona Project; we are literally exporting our water to Saudi Arabia.

Letter #: 403

Date Received: 2/18/2026

Sender Names: 398: Paul Pedersen

Emails: 398: lt302@icloud.com

Organizations:

Subject: Colorado River

DOI - .A 77% or more cut to the Central Arizona Project would be catastrophic. Arizona is a significant contributor to the country's economic engine. A big cut to Arizona's water supply would put a brake on growth. The huge investment in Arizona in advanced chip production could grind to a halt.Any action by the DoI that does not include some kind of cut back by the upper basin would be wrong.Paul A. Pedersen Jjr.Tucson

Letter #: 2110

Date Received: 2/26/2026

Sender Names: 2093: Vesa Pehkonen

Emails: 2093: vesa.pehkonen@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, Thank you for the opportunity to comment on the Post-2026 Operations for Lake Powell and Lake Mead. I encourage the Bureau of Reclamation to prioritize the long-term health of the Colorado River and the ecosystems and communities that depend on it. Future operations should support variable flows through Glen Canyon Dam, maintain minimum flows in the Grand Canyon, and fully consider impacts to downstream ecosystems, recreation, and Tribal water rights before decisions are finalized. These rivers are personally important to me. I hope to run them in the future, and I want them to remain healthy and flowing for generations to come. While the basin faces serious water challenges, we must not sacrifice the river system that sustains us all. Thank you for your consideration. Sincerely, Mr. Vesa Pehkonen 2341 NW 160th Ave Beaverton, OR 97006-7650 vesa.pehkonen@gmail.com

Letter #: 1921

Date Received: 2/18/2026

Sender Names: 1908: Al Pelissier

Emails: 1908: alpelissierjr@yahoo.com

Organizations:

Subject: Colorado river

DOI - . Hello, I struggle to understand why there is an oil pipeline from Alaska to Louisiana but we are charged $800 to $900 a month for water in the Las Vegas area in the summer months to water trees and grass? Isn't there enough graft for the people to build pipelines for water from flood zones and/or the great lakes to subsidize the Colorado River and any other dry areas. Death Valley could be a resort oasis for the rich. Please respondAlYahoo Mail: Search, Organize, Conquer

Letter #: 7087

Date Received: 2/28/2026

Sender Names: 7055: Bradly Pepin

Emails: 7055: Bradly.Pepin@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, The flows of the Colorado River were ALREADY in crisis from overuse by Big Ag. As AI and Data Centers enter the scene, and their grotesque use of water for cooling machines, the availability of water for upwards of 40 million PEOPLE is even further compromised. I think it's important that The Bureau use its authority to push the Basin states to a joint agreement that accepts the need for mandatory conservation measures limiting corporate water abuses. Considering a realistic threat of ecosystem collapse, any plan going forward must halt the expansion of mega dairies, and data centers, and a significant rollback of the cultivation of crops that consume large quantities of water (like alfalfa) and are not suited to growth in Western territories. These agricultural uses are not efficient. Basin states applied 2.6 acre feet of water/acre - 70% higher than the US average - for crops ill-suited to arid climates. Water-hungry data centers make everything worse, with little regulation or regard for impacts on water resources. Every environmental analysis and plan for the future must consider how the River's resources are being used. The overuse of the Colorado River by big agribusiness and technology corporations has serious consequences that threaten accessible drinking water for 40 million people. I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Bradly Pepin 5105 Meadow Rdg Edina, MN

Letter #: 6572

Date Received: 3/1/2026

Sender Names: 6544: Kalli Perl

Emails: 6544: perlfam@gmail.com

Organizations:

Subject: Draft EIS

DOI - . To whom it may concern,Not all water years are bad. The entire region will benefit from two locations, Lake Mead and Lake Powell, to hold water when it is available. Kalli Perl874 E 65 SLindon, UT 84042801-358-1141

Letter #: 3934

Date Received: 2/26/2026

Sender Names: 3647: p perron

Emails: 3647: patriciaperron@hotmail.com

Organizations:

Subject: concerning the new draft

DOI - . Good day,The Colorado River provides drinking water for 40 million people, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems.But the Basin is facing:Record-low reservoir levelsIncreasing salinity and pollution risksCollapsing aquatic habitatsRising temperatures and reduced snowpackGrowing threats to safe, reliable water suppliesThis EIS must reflect the reality of climate-driven water scarcity and prioritize clean water protections, ecosystem health, and equitable solutions, not simply divide up a shrinking supply.The Draft EIS the Bureau has proposed is inadequate to address the crisis that we face, and the agency has failed to reveal what its preferred alternative will be. This denies the public the only real opportunity we will have to comment on the inadequacies of the Bureau's proposal before a final decision is made. We must demand that our communities have a full opportunity to express our concerns before the government takes final action.The Solutions We Need:We urge the Bureau of Reclamation to strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocationsThank you for reading these thoughts.Sincerely,Patricia Perron

Letter #: 175

Date Received: 1/22/2026

Sender Names: 172: Rachel Petersen

Emails: 172: gopgirl1970@yahoo.com

Organizations:

Subject: CO River IMPACT statement

DOI - . Lifelong NV resident, I have written my senators and other regional offices regarding this proposition: IF WE CAN BUILD AN OIL PIPELINE FROM AK TO THE GULF, CAN WE PLEASE BUILD A WATER PIPELINE FROM THE SOUTHEAST USA TO THE SOUTHWEST, FILTERING IT ALONG THE WAY (the SE floods and the SW is in a drought) Regards,Sharon Peters

Letter #: 7306

Date Received: 3/2/2026

Sender Names: 7266: S Peterson

Emails: 7266: stephielynn13@gmail.com

Organizations:

Subject: AZ water

DOI - . Please help us with having access to water. Especially with the shortage of any rain or snowfall in our State.

Letter #: 5667

Date Received: 2/28/2026

Sender Names: 5631: Carolyn Petrakis

Emails: 5631: Carolyn.Petrakis@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, I am a U.S. citizen and a retired clinical social worker with decades of experience in healthcare. My professional life has centered on protecting human well-being, and I am deeply concerned about the health of the environment and all living beings who depend on it. The safety of our waters is fundamental to public health. The Colorado River is in crisis. Yet discussions of future management alternatives fail to adequately account for how the River's water is used. The Bureau must use its authority to push the Basin states to reach a joint agreement that includes mandatory conservation measures and firm limits on corporate water overuse. Major agribusiness and technology corporations are placing unsustainable demands on the River. Alfalfa farms across all seven Basin states consumed an estimated 2.1 trillion gallons of water in 2025--enough to supply the Basin's 40 million people with water for nearly three and a half years. Mega dairies consumed 82 billion gallons of water in 2022 across the Basin states (excluding Wyoming, for which no data were available), while also contributing significant pollution that threatens drinking water. These agricultural uses are not efficient. Basin states applied 2.6 acre-feet of water per acre--70% higher than the U.S. average--for crops ill-suited to highly arid climates. At the same time, large technology companies are deploying water-intensive data centers across the Basin states with little regulation or regard for impacts on water resources. With the Colorado River already severely overdrawn and facing ongoing drought and record-low water levels, every environmental analysis and long-term management plan must directly address how the River's resources are being used. The overuse of the Colorado River by major agribusiness and technology corporations has serious consequences that threaten accessible drinking water for 40 million people. Any responsible plan going forward must include an immediate halt to the expansion of alfalfa, mega dairies, and data centers, along with a significant rollback of crops that consume large quantities of water and are not suited to growth in arid climates. I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Carolyn Petrakis 6721 N Talman Ave Chicago, IL

Letter #: 6028

Date Received: 3/1/2026

Sender Names: 6002: Jasmyn Phillips

Emails: 6002: tahititide@gmail.com

Organizations:

Subject: Draft EIS: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

DOI - . Dear Secretary Burgum,I'm writing to express my recommendation for the Draft EIS to analyze impacts of the Proposed Alternatives on the Salton Sea and surrounding communities. As an integral part of the Colorado River watershed, the Salton Sea region is directly and indirectly affected by operations on the River. This has been the case for decades of policy and management decisions. The Imperial Valley's sole source of surface water is imported from the Colorado River. Since 2003, Imperial Valley farmers have conserved over 9 million acre-feet of water to benefit Colorado River reservoirs. While conservation mechanisms such as optimized irrigation practices, fallowing, and deficit irrigation programs aim to protect critical elevations at Lakes Powell and Mead, it drastically reduces inflows to the Salton Sea, accelerating the lake's decline. The short term mitigation activities of the State and the long term Federal feasibility study are deficient in addressing the effects of increasing shortages and conservation volumes on the Salton Sea. Voluntary cutbacks to generate conserved water come with devastating consequences to the region.

Reducing the use of Colorado River water leads to economic, agricultural and tourism losses, a worsening public health crisis, impacts to Tribal and extractive resources and degrades habitat of federally endangered and listed species due to decline in water quality and availability.The Bureau of Reclamation is an important stakeholder in the Salton Sea region with key investments. The Federal government is the second largest property owner at the Salton Sea. It manages over 40% of land under and around the lake to support ecological revitalization and protect public health from air quality violations. Reclamation built the infrastructure - Imperial Dam, All-American Canal and the extensive 23,000 miles of tile and tail water drainage system that supports Imperial Valley's multi-billion dollar agricultural economy. The US Fish and Wildlife Service operates the Salton Sea Sonny Bono National Wildlife Refuge and collaborates with other agencies to expand the State's largest and first major restoration project at the Salton Sea. The federal interests at the Salton Sea are maintained by reliable water supplies from the Colorado River. Reclamation has established strong partnerships with State and local entities in Imperial and Coachella Valleys working to improve conditions in the region. By considering the Salton Sea in the scope of analysis, it is possible to reduce pressure on dam and reservoir operations while protecting the Salton Sea during these challenging hydrologic conditions.In addition, I support desalination with interstate water transfers and exchanges as supplemental tools to improve supply and reliability on the River for post-2026 operating guidelines. This could also include ocean water importation to further restoration initiatives at the Salton Sea. I strongly urge the Bureau of Reclamation to examine the full impacts of the Proposed Alternatives on the Salton Sea region and provide an extension to the public comment period until a complete and thorough analysis is provided. I appreciate Reclamation's constructive engagement with the public and look forward to future opportunities to comment.

Letter #: 3245

Date Received: 2/26/2026

Sender Names: 3215: Dorany Pineda

Emails: 3215: DPineda@ap.org

Organizations: Associated Press

Subject: AP -- draft EIS on Colorado River comments

DOI - . Hi there, I hope you're well. Dorany here with the AP. I see the deadline for written comments on the Colorado River draft EIS is this coming Monday, March 2. Wondering when those comments will be posted publicly and where we can find them when they are. Any guidance is appreciated.

Thank you, DoranyDorany PinedaClimate & environment reporter213.798.2549dpineda@ap.org The information contained in this communication is intended for the use of the designated recipients named above. If the reader of this communication is not the intended recipient, you are hereby notified that you have received this communication in error, and that any review, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify The Associated Press immediately by telephone at +1-212-621-1500 and delete this email. Thank you.

Letter #: 6277

Date Received: 3/1/2026

Sender Names: 6250: Patricia Pipkin

Emails: 6250: pjpipkin@mac.com

Organizations:

Subject: Consider the broader environment, not just people's immediate water use

DOI - . Dear Guardians of the River, I know that the negotiations for the use of Colorado River water are immensely complicated and I do not pretend to understand the details and complexities, but I know that all of us humans depend on the broader environment for long-term survival and that there are a lot of other species that deserve consideration in these negotiations, too. Please prioritize the health of the river itself, which in the long term means human health, too. Respectfully, Patricia Pipkin Grand Junction

Letter #: 21

Date Received: 1/17/2026

Sender Names: 20: Bob Pischke

Emails: 20: fischer_76@yahoo.com

Organizations:

Subject: States rights - Colorado river water 2026

DOI - .Unfortunately the history of Colorado River is US 1st(california)this no longer should holdCalifornia continues to dump TRILLIONS of potable gallons/acre feet into Oceanthey have unique ability but refuse to take action----Here in Arizona we'd love to have OPTIONS but continually get dumped on by Californiatime to ALLOCATE fair share to Nevada and ArizonaI've been in Tucson for 40 years and have seen SERIOUS conservation effortsI disagree with the build build build programs allowed by STATE given our limited resourcesPlease federal government step in and REALLOCATEStop the bully pulpit of California/ColoradoSincerelyTucsonanBob Pischke

Letter #: 6195

Date Received: 3/1/2026

Sender Names: 6168: Dawn Pisturino

Emails: 6168: dawnpisturino@gmail.com

Organizations:

Subject: Public comments

DOI - . Dear Sirs,As an Arizona resident, I want to see the state take water issues more seriously. We are repeatedly told we have plenty of water, yet Arizona remains in a severe drought. City and county administrators continue to plan and build more subdivisions that threaten our water supply. Data centers, which suck up energy and water, are encouraged by state and local governments, knowing that they threaten the water supply. We don't want more people or houses in Arizona. If reducing Arizona's water allocation forces the State to conserve water, I am all for it. Arizona can't keep building without facing severe water shortages in the future. This is true throughout the Southwest.Please help us!Thank you.Dawn Pisturino4873 N Teddy Roosevelt RdGolden Valley, AZ 86413

Letter #: 17995

Date Received: 12/4/2024

Sender Names: 11019: Katherine Plosky

Emails: 11019: katherineplosky@gmail.com

Organizations:

Subject: Page 020

The Colorado River flows through many historic sights and natural wonders. It is sacred to the people indigenous to the land it crosses. It provides a habitat for fresh water life and a source of water to the surrounding environment. Unfortunately, the river is struggling. In this century, it has shrunk significantly and it is at risk of ceasing to flow entirely. The main reservoirs are low on water and climate change fueled droughts threaten to make them even worse. It is the job of the Bureau of Reclamation to take care of situations like this. Although it may seem like a daunting task, there are numerous plans available to ameliorate the Colorado River. Please take action to protect this sacred water source. The ongoing mega-drought demands bold, science-based action to protect the Colorado River system for future generations. We need a strong approach that provides an actionable framework for safeguarding critical infrastructure, protecting endangered species and the Grand Canyon, maintaining ecosystem function, and ensuring climate resilience. None of these proposed alternatives fully address the impacts that will result from a dead pool situation. This is a serious omission that Reclamation needs to address in the Final EIS. We also urge the Bureau to use its considerable influence with the States to expand greater conservation efforts. There is less water now to use than there was, and there will be even less in the future. We need to adapt a new way of thinking, using a lot less water and rethinking how "beneficial use" is defined. I urge you to adopt a science-based, climate-resilient approach that: -Requires significantly stronger conservation across all sectors -Ensures equitable and implementable shortage sharing -Protects the Grand Canyon and endangered species -Maintains ecosystem function throughout the basin -Fully respects Tribal sovereignty and senior water rights -Reexamines outdated assumptions about "beneficial use" in a hotter, drier future The Colorado River is in crisis, and the decisions you make now will determine whether this river system can survive for future generations.

Letter #: 7666

Date Received: 3/2/2026

Sender Names: 7614: Douglas Pociask

Emails: 7614: dougpociask@icloud.com

Organizations:

Subject: Arizona water

DOI - . Stop the growth and or expansion of communities. Water is precious let us cherish it. Also, Donald Trump has placed date centers and/or Chip makers in the State which use and pollute the water supplies we have. Restrict the centers water use and monitor the release of polluted water to the public! Please excuse any grammatical errors.

Letter #: 2868

Date Received: 2/21/2026

Sender Names: 2841: Amanda Poindexter

Emails: 2841: poindexter.amanda@gmail.com

Organizations:

Subject: Water Policy Comment

DOI - . To whom it may concern: As a resident of Glenwood Springs, water scarcity is front and center. Risks of wildfires and river flows are seen and felt. Some ideas to ratchet back water use include the following:Greywater used for landscaping - why can't it be mandated that buildings plumb black and grey water separately, allowing the greywater to be used for landscaping in the warmer months? This reduces strains on the wastewater treatment plants and reduces landscaping water use. It's as simple as adding a valve where the greywater can be diverted to the landscape in the warmer months and back to the sewer line when it's cold. This was legalized in the state of Colorado but was required by local jurisdictions to adopt their own amendment for this. The City Of Aspen has done this, but the language is so complicated that no one has pulled a permit. It needs to be simple and it needs to be required.Golf courses should be required to utilize faux turf. The amount of water that is used by golf courses is ridiculous when some people need that water for life. If faux turf can't be mandated, then they should never be irrigating with fresh water. Drop the "use it or lose it" policy. I do not know the details of this, but I do know that if someone who was allocated the original amount of water rights and does not use it every year, then their allocation gets dropped. The year of these allocations was an unprecedented year and no one should be penalized for using less water.Water is life. It is needed at the simplest aspect for drinking and to grow our food. It's necessary for wildlife, river life and is a part of the community as those whose jobs (and recreations) are tied to the river. Policy is key and everyone needs to do their part. Thank you. Amanda Amanda Poindexter 720-219-3683 Sent from Gmail Mobile

Letter #: 5843

Date Received: 2/28/2026

Sender Names: 5804: Joseph Ponisciak

Emails: 5804: info@greatbasinwater.org

Organizations:

Subject: Joseph Ponisciak Comments on Colorado River

Great Basin Water Network DOI - . The DEIS ignores the complete geographic scope, and the impacts of that narrowed scope from curtailments, inaction, and limited action in directly affected communities in the Lower Colorado River Basin.Air quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water availability impacts on communities in the Lower Colorado River Basin are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Impacts on Lower Region MSCP (27 species including listed Endangered Species) are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Socioeconomic impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts on Lower Colorado River communities that will result from the alternatives in the DEIS.Impacts on recreation facilities, refugia, park service units, federal infrastructure, and directly connected waterways of the Colorado River System are too narrowly reviewed in the Technical Appendices.If you have any additional questions please contact me.Joseph Ponisciak(c) Great Basin Water Network.
Powered by weForms.

Letter #: 833

Date Received: 2/26/2026

Sender Names: 823: Michelle Postma

Emails: 823: michellkepostma@everyactioncustom.com

Organizations:

Subject: Thank you& Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, Hello & good morning! I recognize that the discussions and current situation must present great challenges and heartache. Thank you for your efforts. I know you are doing your best to take care of everyone. The main points are outlined below. I also urge you to enlist the help of the Returning Rapids project and of Zak Podmore. These are experts in the field who truly have everyone's best interests at heart. Zak Podmore's book 'Life After Deadpool' provides a clear and concise overview of the Colorado River water situation and provides actionable suggestions while also acknowledging difficulties on all sides. We are past the blame, we must work together for the good of all. I am sure you will enact a healthy and harmonious solution. Thank you! Much Love, Michelle Postma Thank you for this opportunity to provide input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - Draft Environmental Impact Statement (Post-2026 Operations). I urge you to take immediate action to protect the future of the Colorado River Basin and to recognize the many ecosystem services that the river and its tributaries provide. When determining the preferred Alternative for Post-2026 Operations, I request that the Bureau of Reclamation prioritize the below elements and work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river for generations to come. - Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. - Infrastructure updates at Glen Canyon Dam must be prioritized in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. - Conservation measures and delivery of water between the Upper and Lower Basins must balance maintaining minimum flows at all times in the Grand Canyon with allowing for flow variability across the annual hydrograph to support both the river ecosystem and river recreation opportunities. - Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities, and seek to provide multiple benefits whenever possible. - Impacts to river recreation opportunities on the Colorado River and the San Juan River due to changing reservoir levels must be analyzed and mitigated. - Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. A trip through the canyons of the Colorado River leaves a lasting impression on all who make the journey. The river that carved these canyons is the hardest working in the country. Keeping the river flowing and healthy is integral to protecting the safety and welfare of the people who rely on it. We must work with what nature provides and do so together. All of the Colorado River's water users are going to feel a strain, but we cannot sacrifice these special river canyons and the ecosystem services that they provide. Sincerely, Ms Michelle Postma 2319 Valley Dr Missoula, MT 59802-3147 michellkepostma@gmail.com

Letter #: 7360

Date Received: 3/2/2026

Sender Names: 7320: Jeffery Powell

Emails: 7320: jpowell5762@gmail.com

Organizations:

Subject:

DOI - . Phoenix Water As a resident of Phoenix and watching my water bills climb and using as little as possible including letting my grass die I am concerned by the number of data centers being built! They use between 250,000 and 500,000 gallons of water a day! A new one million sq ft facility ie being built only 3 miles south of us! Let's use common sense and locate these centers in less water critical areas. Save the water for all of the residents of the affected states. Thank you. Jeffery Powell Phoenix, Arizona 602-349-6983

Letter #: 7772

Date Received: 3/2/2026

Sender Names: 7720: John H. Powell

Emails: 7720: jhpowell@usbr.gov

Organizations:

Subject: Fw: [EXTERNAL] RE: Comment on reducing Colorado River water usage

To Whom It May Concern: I am a fish biologist in the Columbia Pacific Northwest Regional Office. Last spring our office completed a Programmatic Environmental Assessment for one of the projects I work on. For that effort we established an e-mail account to accept public comments. In checking that e-mail's inbox we discovered the following e-mails, which I am forwarding so that this individual's comment can be recorded. Thank you, John Powell John Powell, PhD Fish Biologist | Environmental Services Columbia-Pacific Northwest Region Bureau of Reclamation 1150 Curtis Rd, Boise, ID 83706 Mobile: 986-279-0729 From: Dan Peterson <djpco33@gmail.com> Sent: Wednesday, January 14, 2026 10:50 AM To: P2IP_PEAProject, BOR PNR <bor-sha-P2IP_PEAProject@usbr.gov> Cc: ian james@latimes.com <ian james@latimes.com> Subject: [EXTERNAL] RE: Comment on reducing Colorado River water usage DOI - . From: Dan Peterson <djpco33@gmail.com> Sent: Wednesday, January 14, 2026 9:48 AM To: 'bor-sha-p2ip_peaproject@usbr.gov' <bor-sha-p2ip_peaproject@usbr.gov> Cc: 'ian james@latimes.com' <ian james@latimes.com> Subject: Comment on reducing Colorado River water usage Mr. James, Read your article on allocation of Colorado river water and the solution seems simple to a southern California user, Dan Seems simple to me, just Reduce everyone's usage proportionally to their existing allocation. Dan Remember the old adage, the KISS principle, keep it simple

Letter #: 3189

Date Received: 2/26/2026

Sender Names: 3160: Michael Powers

Emails: 3160: mipowers@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, Thank you for this opportunity to provide input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - In simple terms, downstream users must begin reducing usage to allow the river and related tributaries to function at natural flow rates. It is time to rethink the trade offs between recreational use and sustainable flows. The Colorado River that carved the canyons is the hardest working in the country. Keeping the river flowing and healthy is an important objective for a sustainable ecosystem. We must work with what nature provides and do so together. All of the Colorado River's water users are going to feel a strain, but we cannot sacrifice these special river canyons. When determining the preferred Alternative for Post-2026 Operations, I request that the Bureau of Reclamation prioritize the below elements and work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river for generations to come. - Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. - Infrastructure updates at Glen Canyon Dam must be prioritized in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. - Conservation measures and delivery of water between the Upper and Lower Basins must balance maintaining minimum flows at all times in the Grand Canyon with allowing for flow variability across the annual hydrograph to support both the river ecosystem. . - Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems. - Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. Sincerely, Mr. Michael Powers 5592 Cathers Creek Dr Powder Springs, GA 30127-7857 mipowers@comcast.net

Letter #: 7569

Date Received: 3/2/2026

Sender Names: 7520: prathfel@orbitelcom.com

Emails: 7520: prathfel@orbitelcom.com

Organizations:

Subject: Colorado River - Evaporation in Canals

DOI - . Thank you for viewing. As part of the Colorado River Agreement, has anyone calculated the amount of evaporation from the existing open-topped canals which move the water? In Arizona, I imagaine when the temperature is higher than 100 deg F, the evaporation is significant. Covering the canals, and perhaps installing solar cells on top, could reduce the evaporation. Again, thank you, Peter A. Rathfelder Maricopa City Arizona

Letter #: 7706

Date Received: 3/2/2026

Sender Names: 7520: prathfel@orbitelcom.com

Emails: 7520: prathfel@orbitelcom.com

Organizations:

Subject: Colorado River - Californa Should Build More Reservoirs

DOI - . Thank you for viewing. As part of the Colorado River Agreement, California should be required to commit to constructing more water storage reservoirs. Significant rain falls on California, and since the reservoirs are insufficient, much of the rain water flows into the Pacific. If California had more reservoirs, they would require less Colorado River water. Again, thank you, Peter A. Rathfelder Maricopa City Arizona

Letter #: 3987

Date Received: 2/26/2026

Sender Names: 3941: printwithus4567@gmail.com

Emails: 3941: printwithus4567@gmail.com

Organizations:

Subject: Irrigation Water To Lease

DOI - .

Letter #: 3543

Date Received: 2/26/2026

Sender Names: 3510: Janine Proctor

Emails: 3510: nineeisace2001@yahoo.co.uk

Organizations:

Subject: Colorado River

DOI - . The future of the Colorado River depends on bold, decisive action -- not incremental adjustments to a system that is already failing. We need a management framework that safeguards clean water, protects Basin communities, and restores ecosystems for generations to come.The Bureau of Reclamation has a critical opportunity -- and responsibility -- to confront the full reality of climate-driven water scarcity. The Post-2026 Colorado River Basin Draft Environmental Impact Statement must meaningfully address declining flows, degraded water quality, and the escalating risks facing communities, Tribal Nations, agriculture, and wildlife throughout the Basin.The Colorado River is already overallocated and shrinking. Continuing to divide a diminishing supply without enforceable reductions in demand will only deepen the crisis. The Bureau must prioritize long-term sustainability, climate resilience, meaningful Tribal consultation, and legally binding reductions in water use.I urge the Bureau of Reclamation to significantly strengthen the Draft EIS to reflect the scale of the crisis we face. The revised proposal must include enforceable demand management strategies, robust ecosystem protections, and clear commitments to water quality safeguards. The public must also be given an opportunity to review and comment on any substantially revised proposal before a final decision is issued.This moment demands leadership equal to the challenge. The health of the Colorado River -- and the millions of people, ecosystems, and economies that depend on it -- cannot afford delay or half measures.If you'd like, I can also:Make it shorter for a comment portal word limitMake it more technical and policy-focusedAdd economic or climate data for stronger evidenceAdjust tone (more urgent, more diplomatic, more legal, etc.)RegardsJanine ProctorSent from Yahoo Mail for iPhone

Letter #: 6282

Date Received: 3/1/2026

Sender Names: 6255: Chris Prottas

Emails: 6255: prottas@gmail.com

Organizations:

Subject: Public Comment on the Draft Environmental Impact Statement

DOI - . Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake MeadRe:
The Draft EIS should address the governance deficit that makes consensus-based operations structurally difficult to achieve, and should recommend citizen assemblies as a mechanism for depoliticizing interstate water allocation negotiations.I am writing as an individual commenter and resident of Arizona to address a critical gap in the Draft EIS: the absence of any analysis of the governance processes through which a consensus-based agreement among the seven basin states might actually be reached.The EIS Acknowledges a Problem It Does Not Attempt to SolveActing Commissioner Cameron stated that Reclamation has not identified a preferred alternative because "a consensus-based approach to operations" is essential to "the stability of the system." The Draft EIS itself notes that "historically, achieving a consensus-based approach to Basin reservoir operations has proved critical to the long-term operating success of the Basin." This is correct. But the document evaluates five operational alternatives without examining whether the current negotiation structure is capable of producing the consensus it identifies as necessary. I believe it is not -- and that this structural deficiency deserves analysis alongside the hydrological and environmental impacts already assessed.The Structural Incentive ProblemThe current negotiation framework places state-level politicians and their appointed negotiators in an impossible position. Any agreement that reduces a state's historical water allocation, imposes new conservation obligations, or redistributes shortage risk will be characterized by domestic political opponents as "losing" water for their state. This is true regardless of whether the agreement is hydrologically sound, ecologically necessary, or in the long-term interest of the state's residents.The result is asymmetric political risk: obstruction carries no immediate cost, while compromise is punished. This dynamic has been visible throughout the post-2026 process and in the negotiations that preceded the 2007 Interim Guidelines and the 2019 Drought Contingency Plans. It explains why Reclamation has arrived at a Draft EIS with no preferred alternative and an October 2026 deadline that is now less than seven months away.The five alternatives analyzed -- from No Action through Supply Driven -- represent a thoughtful range of operational possibilities. But absent a governance mechanism that makes agreement politically viable, the technical sophistication of these alternatives may be rendered moot.Citizen Assemblies as a Path to Depoliticized DeliberationI recognize that a comment on governance process may appear to fall outside the scope of a NEPA environmental impact analysis, which is properly focused on the environmental consequences of proposed federal actions. But the Draft EIS itself makes the case for relevance: it repeatedly identifies consensus-based agreement as essential to the long-term operational stability of the Colorado River system, and it declines to designate a preferred alternative precisely because that consensus does not yet exist. If the governance structure through which agreement is pursued systematically impedes agreement, then that structure is a material factor in the environmental outcomes the EIS is meant to evaluate. A process that cannot produce timely consensus defaults to No Action or to ad hoc emergency measures -- both of which the Draft EIS models as producing worse environmental, hydropower, and water delivery outcomes than the coordinated alternatives. Governance process is therefore not peripheral to environmental impact; it is upstream of it.I urge Reclamation to analyze and recommend, in the Final EIS, the use of citizen assemblies within each of the seven basin states as a complementary process for building public mandate around a consensus agreement.A citizen assembly is a body of randomly selected, demographically representative residents who are convened to learn about a complex issue, hear from experts and stakeholders, deliberate on tradeoffs, and produce recommendations. The OECD has documented over 700 such processes worldwide since 1979, and their use is accelerating. They are particularly well-suited to issues that are complex, values-laden, long-term in consequence, and where elected officials face conflicts of interest -- a description that fits Colorado River management precisely.The mechanism addresses the structural incentive problem in a specific way: when a citizen assembly produces recommendations, elected officials can defend their adoption as reflecting the informed will of their constituents, rather than as a concession extracted by other states. This transforms the political

calculus from "I gave away our water" to "I listened to our people."Relevant PrecedentsIreland (2016-2018): Ireland's Citizens' Assembly of 99 randomly selected members deliberated on constitutional questions including abortion and climate policy. Their recommendations led to a constitutional referendum and a national climate action plan -- outcomes that had been politically impossible through conventional legislative channels for decades.The Netherlands (2025): The Dutch National Citizens' Assembly on Climate convened 175 randomly selected participants over seven weekends to develop climate policy recommendations. The government is legally required to respond to the assembly's proposals within six months, accepting, rejecting, or modifying each with stated reasons. This is the closest existing model to what I am proposing: a nationally significant environmental issue with binding government response obligations, demonstrating that lay citizens can engage productively with technically complex, multi-stakeholder resource management questions.Montrose, Colorado: Directly within the Colorado River Basin, the city of Montrose convened a citizen assembly on childcare policy that produced eight substantive proposals. This demonstrates that the deliberative model is already being practiced in basin communities and is culturally viable in the rural West.Oregon Citizens' Initiative Review: Oregon has institutionalized citizen panels that review ballot measures and produce publicly distributed evaluations, providing a standing model for how deliberative processes can be embedded within existing democratic structures.OECD Research: The OECD's extensive study of deliberative processes finds that citizen assemblies produce recommendations that are broadly accepted by the public precisely because the process is seen as representative and non-partisan -- the qualities most lacking in current interstate water negotiations.What This Would Look Like in PracticeI am not proposing that citizen assemblies replace the existing negotiation framework. Rather, they would run in parallel, feeding into it:Each of the seven basin states convenes a citizen assembly of 80-150 randomly selected residents, stratified to reflect the state's demographics, including urban and rural populations, agricultural and non-agricultural water users, and tribal communities.Assembly members receive structured briefings on Colorado River hydrology, the Law of the River, the five Draft EIS alternatives and their modeled outcomes, and the interests and constraints of other basin states. They hear from experts, water users, tribal representatives, and environmental stakeholders.Each state assembly deliberates over several weekends and produces recommendations on the tradeoffs their state should be willing to accept in pursuit of a durable basin-wide agreement.A joint session, with delegates from each state assembly, deliberates on areas of convergence and divergence across the seven sets of recommendations, producing a composite set of citizen recommendations for Reclamation and the basin states to consider.The resulting recommendations give state negotiators democratic cover to reach compromises that would otherwise be politically untenable.Connection to the Draft EIS AlternativesThis process would directly inform the selection and refinement of a preferred alternative for the Final EIS. The citizen assemblies could evaluate the relative merits and tradeoffs of the five analyzed alternatives and their component elements, providing Reclamation with structured public input that is qualitatively different from -- and more representative than -- the traditional public comment process, which tends to amplify organized interests over the general public.RequestI request that Reclamation:1. Acknowledge in the Final EIS that the governance structure through which consensus is pursued is itself a variable that affects environmental outcomes, and that the current structure creates political incentives that work against timely agreement.2. Analyze whether deliberative democratic processes such as citizen assemblies could improve the likelihood and durability of a consensus-based agreement.3. Recommend that the Department of the Interior work with basin states to pilot citizen assemblies as part of the implementation framework for post-2026 operations, with the goal of building public mandate for the difficult allocation and conservation decisions ahead.The Colorado River serves over 40 million people, 30 Tribal Nations, and 5.5 million acres of farmland. The decisions being made now will govern its management through 2060. The stakes warrant governance innovation commensurate with the operational innovation reflected in the Draft EIS.Thank you for your consideration.Chris ProttasPhoenix, AZprottas@gmail.com

Letter #: 3569

Date Received: 2/26/2026

Sender Names: 3536: j m. puett

Emails: 3536: jmorganpuett@gmail.com

Organizations:

Subject: What ????

DOI - . What the hell are you doing? All you know about the world today leads us to one solution, STOP MAKING THE SAME MISTAKES and PROTECT OUR WATER! You have the statistics at hand, PLEASE stop thinking short of your nose for the sake of what - capital gains!?!? IS that your life happiness? WAKE-UP out of your greedy stupor and do something that is meaningful to the world and the people who will suffer! Thank you, J. Morgan Puett

Letter #: 2266

Date Received: 2/25/2026

Sender Names: 2247: Carolyn Raasch

Emails: 2247: wolveshowl2@hotmail.com

Organizations:

Subject: Please support a smarter future for the Colorado River, and all who depend on it!

DOI - . Dear Bureau of Land Mangement You can make a positive difference! Sincerely, Carolyn Raasch PO Box 549 Philipsburg, PA 168660549 wolveshowl2@hotmail.com

Letter #: 8563

Date Received: 3/2/2026

Sender Names: 8486: William Ramsay

Emails: 8486: wdramsay57@outlook.com

Organizations:

Subject: Colorado River public comment

DOI - . Sirs - I am writing in regards to the issues with allocating Colorado River water resulting from the lack of consensus among the states bordering the river. This situation has resulted in potentially draconian cuts to specific states, including Arizona, which are grossly unfair and unsustainable. I am proposing we continue with the current allocation until these states agree to an allocation that is fair and sustainable. Creating a zero- sum outcome is neither. Sincerely, William Ramsay

Letter #: 3826

Date Received: 2/26/2026

Sender Names: 3787: Patricia Randazzo

Emails: 3787: patricia.bucephalus@gmail.com

Organizations:

Subject: Water is a precious commodity

DOI - . The Colorado River is already overallocated and shrinking. The Bureau must prioritize long-term sustainability, meaningful Tribal consultation, and enforceable reductions in demand, not simply identify new ways to divide a declining supply. -- Patricia RandazzoContentment is not the fulfillment of what we want, but the realization of how much we already have.The time is always right to do what is right.

Letter #: 4216

Date Received: 2/28/2026

Sender Names: 4183: Steve Reeves

Emails: 4183: reevesfamily6@me.com

Organizations:

Subject: Don’t drain lake Powell

DOI - . As a life long boater in Powell and all the memories over 40 years, this is absurd You drain it and you lose millions in recreation/ you cut access to some of the most beautiful views on this earth and it will be a barren wasteland that no one will access or just some jeeps will rock climb in. How does that make sense Let alone the impact of water and electrical power Wise up Conserve the water Make down stream states especially California- build new dams to get additional water supply This plan to drain Powell is folly and nonsense Steve 801-388-3191

February 27, 2026

U.S. Bureau of Reclamation
Attn: The Lake Powell – Lake Mead post 2026 Planning Committee
Denver Federal Center
Lakewood, CO

Subject: A Possible Marriage Between the Hydro Electric & Nuclear Power Industries.

I have learned through the internet that the Bureau is currently in the process of creating a "Post 2026 Plan" for Lake Powell and Lake Mead, and that they are asking for input from the respective impacted parties involved. The following is, therefore, submitted to the Bureau for consideration. I sincerely hope that it is helpful.

Water – A review of the current situation – The Bureau already knows this:

Southern California is desperately short of fresh water.
It gets most of its water from Lake Havasu through the Colorado Viaduct
Lake Havasu gets most of its water from Lake Mead
Lake Mead gets most of its water from Lake Powell
Lake Powell gests most of its water from the Colorado River
The Colorado River gets its water from Tributaries and Reservoirs all of the way up to the Continental Divide.

The Front Range municipalities (Boulder, Golden, Denver and its suburbs) on the East side of the Continental Divide, get most of their water from tributaries and reservoirs of the Colorado River on the Western Slope through tunnels, under the Continental Divide.

Due to the population growth in all the above areas, there is not enough water, and what there is, is not balanced (i.e. too much in the Spring-Summer, and not enough in the Fall-Winter). Wikipedia reports that "Collectively, dams in the Colorado basin can hold four to five times the river's annual flow, generating hydroelectricity and supplying irrigation and municipal water for over 35 million people." All of this is complicated by water rights (i.e. who owns the water). Some folks "own" water that doesn't exist. It would appear that the Colorado River Basin has more than enough storage. Bottom Line, however, even if it could be balanced?

There simply is not enough water!

Electric Power

America is currently short of electric power in its power grid. It has historically been able to supply that need with coal, natural gas, other non-renewable power sources, and limited amounts of hydropower and nuclear power. Additionally, some balance of both water and electric power, has been accomplished with "Pumped Water Storage" Projects. Currently, however, wind and solar power have been put forth as the answer to supplying the needed additional electricity to replace the non-renewable fossil fuel sources as they are forcefully phased out, claimed to be needed to prevent man-made climate change.

Three problems:

1. Wind and Solar will find it difficult to provide the additional power needed, because it is not reliable – only generating electricity when the sun shines, and the wind blows.
2. These two forms of power generation can only be viable at locations where there are sufficient wind and solar sites to make them work.
3. With the emergence of Artificial Intelligence (AI) requiring enormous amounts of reliable balanced electricity, solar and wind will be incapable of providing that power. Fossil fuels, while currently being relatively abundant, are a finite resource. America MUST therefore develop a power source that is not only balanced and reliable, but also capable of generating the massive amounts of NEW electricity needed in the future, as fossil fuels are phased out.

That Power Generation Source Could Possibly be Nuclear Power (read on)

Nuclear Power

Nuclear power has been demonized for the past 60 years or so, as being too dangerous. NOT SO. America's Navy fleet has been powered with nuclear power for over 60 years now with NO incidences of radioactive accidents NONE! All of the "new" nuclear power plants developed in the United States in the last 50+ years, in fact, have been developed, and operated safely, and have caused NO health problems due to radiation; despite loud and continuous objections to them. There are now 94 nuclear power plants in America – just a few in the West, and none in Colorado. Nuclear Power plants (all of the way from Small Modular Reactors (SMRs) to full sized reactors, are being embraced and developed all over the world (Many of them manufactured by American Companies) to generate the additional, balanced & balancing, electricity needed as a result of the massive amounts of NEW reliable (i.e. Balanced) electricity needed. Nuclear Power is needed to ensure energy independence here in America and support AI. Most people in America know that AI can be used for the betterment of humanity or the demise of it. Because of the possibility that AI will have a detrimental effect on Humanity, a number of people in America are opposed to its mere existence. With all due respect to these folk's fears, AI will be developed all around the World, and if developed in dominant quantities by non-free nations (China), It will be used as a "tool" for "control" of the Free World (America). Our own government has now realized this and has committed to the purchase of 10 new full-sized nuclear-powered plants, without, as yet, divulging where these new nuclear power plants will be located, and how they will be used. The use of them, along with the Hydroelectric Industry, to jointly produce the massive amounts of NEW water and electricity is, therefore, hereby recommended. (read on)

A Marriage Between Hydro Power, and Nuclear Power Should be Considered.

1. One, or more, full sized Nuclear Power Plants could be constructed in the L.A. area in California near the Ocean. A small part of that power generated could be used to desalinate water from the Ocean. Some of the remaining power could then be used to pump that now "fresh" water in a penstock (i.e. pipeline) up to Lake Mead. It is said to only be about 30% full now, with no current way to fill it. Some of that new, and existing, water can then be gravity flow fed down to Lake Havasu, and further to all of the communities in Southern California through the existing Colorado Viaduct, to solve their current and future freshwater (both volumetric and balancing) problems.
2. Power from that, or other new nuclear power plants, could be used to pump water from Lake Mead (in a penstock) up to Lake Powell, which is also, only about 30% full, with no known other source to fill it. It is recognized that the penstock from Lake Mead to Lake Powell will undoubtedly not be allowed to be developed through the Grand Canyon for a number of reasons. The mere suggestion or inference that this is possible will be met with very loud, consistent, and successful objections from the very powerful environmental factions here in America. One or more alternative routes for the penstock must, therefore, be conceived and presented along with the presentation of this concept. A possibility might be to construct the penstock from Lake Mead in the median of Interstate #15 up to the St. George Utah area, then east to Lake Powell along the shoulder of U.S. Hwy. 89. It is recognized that this is merely one option that might be pursued. There is no doubt that there are many bright innovative engineers within the Bureau of Reclamation who are creative enough to come up with other alternatives.
3. Probably the biggest hurdle to overcome (as the Bureau well knows) is the fact that the **massive environmental factions in America are obsessed with the demise and destruction of Glen Canyon Dam, and Lake Powell, at any cost, and through any means. Their current scheme is to "fill Lake Mead first with existing water from the Colorado - run straight through Lake Powell". This will then resurrect their demand for the destruction of the Glen Canyon Dam and Lake Powell.**
4. If this proposed concept is adopted, power from these (or other new nuclear power plants) could then be used to pump some of this "new" fresh water in Lake Powell up stream along, or near, the Colorado River, in a penstock, all of the way up to the Continental Divide to replace, add to, and balance, the existing, and possible new reservoirs in Colorado to provide the water needed through the existing tunnels to balance and provide the new water needed in the Front Range Communities. Power could, and should, then be generated by Hydro Power Plants at the appropriate, or new, reservoirs, on both sides of the Continental Divide, as the increased quantity of water then flows both ways from the Continental Divide - controlled and balanced.

This would be expensive, but we need to remember that ten full scale nuclear power plants, at $6 Billion apiece, would be less costly than half of the property's value lost in the Palisade Fire. This concept would additionally provide the water needed to fight the wildfires that have and will continue to occur in the American West. It must be reiterated that both Nuclear & Hydro Power are "Load Sensitive". They can be produced 24/7 when needed, or not at all.

Additionally, all of this new nuclear and hydro development will pay for itself!

This concept should at least be considered.

Other Related Observations (Opinions)

1. **Glen Canyon Dam and Lake Powell can arguably be considered as the HUB for the U.S. Western states to be able to solve both their water volume and balancing problems, and be able to help the Nuclear Power Industry to be able to solve the massively increased electric power volume and balancing needs for the entire nation.**

2. **The World Elite does not want America to be energy independent, nor to continue to be so in the future. Controlling America's energy supply is one of the major tools the World Elite will be using to be able to completely control and dominate America. Destroying the Hydro Electric Industry will merely be necessary to accomplish that!**

The Bureau can play a major role in preventing this!

Respectfully Submitted
Dave Reid
27880 Pine Drive
Evergreen, CO 80439
dcrevergreen@msn.com
(303) 870- 4209

Any contact with me would best be accomplished by e-mail or text. I am an 85 year old disabled Navy vet (I'm deaf).

Again, I sincerely hope that this information will be helpful

Letter #: 10326

Date Received: 12/4/2024

Sender Names: 10132: Taylor Rhoton-Anderson

Emails: 10132: trhoton22@gmail.com

Organizations:

Subject: Page 1465

I Support Recreation on the Colorado River Basin I am writing as a supporter and user of Lake Powell, Lake Mead and water in the west. I am a concerned citizen and supporter of responsible water and energy infrastructure management. I am writing regarding the proposed alternatives for the Post-2026 Colorado River Operation Guidelines. It is important to recognize the role that the dams within the Colorado River Basin play in ensuring energy reliability, irrigation, water storage, navigation, and regional economic stability. I appreciate the Bureau of Reclamation recognizing BlueRibbon Coalition's Path to 3588' Plan as an alternative considered and recreation as a whole in alternatives analyzed. Glen Canyon and Hoover Dam and the Colorado River Basin, face growing pressure from radical environmental activists and anti-dam interests who seek its decommissioning. These calls threaten the dam's essential functions on the Colorado River system, therefore we appreciate BOR recognizing that moving to a one dam system would not yield a resilient system and would be bad for the environment and the economy. As a recreation user, I support any alternative that recognizes and supports recreational opportunities within the Colorado River Basin. The Supply-Driven, Max Operational Flexibility and Enhanced Coordination Alternatives all identify release levels based off of low water levels, shortages or low inflows which will better protect the dams critical infrastructure. I support any alternative or blend of alternatives in which releases are based off of real water inflows and not maximum deliveries that could hurt the water storage system and ultimately recreation. I support keeping the most water in the reservoirs for recreation as possible. The nation cannot afford to treat these critical infrastructure assets as bargaining chips in speculative environmental campaigns. Lake Powell and Lake Mead are too important to lose, and its operation must be protected. Growing up, my family has spent countless hours at the lake every year. These trips are about more than recreation -- they are about family traditions, celebrating milestones, and spending time with the people I love. From family reunions and birthday celebrations to graduations and time spent with friends, these lakes are a central part of my life and memories. Watching the water levels change over the years has been concerning because I want these experiences to remain available for future generations. The lake isn't just about money, energy, or conservation -- though those are all very important factors that I support and am very familiar with. Even more than that, it is Post-2026 Colorado River 1465 of 5176 about memories, truth, and legacy. These places represent the history of families and communities across the West. I also believe that these decisions should not be based on greed or short-term interests. Those making these decisions should remember who they represent and who they are responsible to serve. Their job is to represent and protect their constituents -- not themselves. They are entrusted to make decisions that reflect the needs, values, and long-term wellbeing of the people they represent. As someone who values both responsible environmental stewardship and access to outdoor recreation, I believe it is possible to balance conservation with preserving the ability for families like mine to continue using and enjoying these spaces. Lake Powell and Lake Mead are not just important pieces of infrastructure -- they are places where families build memories and carry forward their legacy. I hope decision makers consider the human and community impact when evaluating these long-term water management plans Post-2026 Colorado River

Letter #: 1196

Date Received: 2/26/2026

Sender Names: 1186: Christopher Riccardo

Emails: 1186: riccardo.chris@gmail.com

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . From one red rock lover to another: I am submitting comments on the Draft Environmental Impact Statement (EIS) for the Post-2026 Operational Guidelines for Lake Powell and Lake Mead.The Draft does not appear to fully analyze reasonable alternatives or adequately stress-test its modeling assumptions against the hydrologic realities of the modern Colorado River Basin. Given the long-term implications of these guidelines, additional analysis is necessary before a final decision is adopted.1. River-Level Bypass of Glen Canyon DamThe Draft does not meaningfully evaluate river-level bypass of Glen Canyon Dam as a reasonable alternative. Please clarify:What basin-wide systems modeling has been conducted to evaluate bypass under extended megadrought conditions or paleo-hydrologic flow reconstructions?What specific inflow datasets and climate assumptions were used to assess system performance?Has the modeling been stress-tested against worst-case historical drought sequences derived from tree-ring data?What is the quantified probability of minimum power pool or dead pool conditions under each alternative?If bypass has not been evaluated using full basin modeling under low-flow stress scenarios, the Draft should explain why this option was excluded from detailed consideration.2. One-Reservoir or "Fill Mead First" StrategiesGiven current and projected hydrology, it is increasingly unlikely that both Lake Mead and Lake Powell can be reliably filled. The Draft should therefore analyze one-reservoir configurations in detail.What peer-reviewed evidence supports the conclusion that maintaining two primary storage reservoirs provides greater long-term resilience under aridification scenarios?Has comparative evaporation loss been quantified between dual-reservoir and single-reservoir operations under projected warming?How does each alternative perform under extended low-flow projections that reflect 21st-century conditions rather than 20th-century averages?A comprehensive evaluation of system restructuring is necessary to ensure flexibility and long-term sustainability.3. Ecological, Cultural, and Reemerging Resources in Glen CanyonAs reservoir levels have declined, substantial ecological and cultural resources have reemerged in Glen Canyon, including riparian habitats, archaeological sites, and nationally significant geologic features.What quantitative ecological metrics were used to evaluate these reemerging resources relative to other Basin values?Has a cumulative impacts analysis been conducted that includes sediment transport, riparian recovery, and downstream ecosystem effects?How were Tribal cultural resources evaluated in relation to continued submergence versus reemergence?These resources should receive full analytical consideration within the alternatives framework.4. Demand Reduction and New DiversionsThe Basin's structural imbalance between supply and demand is well documented.What enforceable demand-reduction mechanisms are included under each alternative?How does the Draft reconcile continued diversion growth with projected inflows under climate-adjusted modeling?On what hydrologic or legal basis are new non-Tribal diversions justified under shortage conditions?The EIS should require clear curtailment planning from each state before finalizing operational standards.The decisions made in this process will shape the Colorado River system for decades. Final guidelines must be supported by transparent modeling, full evaluation of reasonable alternatives, and analysis grounded in the best available science.I respectfully request that these analytical gaps be addressed prior to adoption of the Post-2026 Operational Guidelines.Thank you for your consideration.Regards,Chris Riccardo872-314-4414

Letter #: 10371

Date Received: 12/4/2024

Sender Names: 10176: Nathan Riddle

Emails: 10176: nathan@iapfipms.com

Organizations:

Subject: Page 1514

I Support Recreation on the Colorado River Basin I am writing as a supporter and user of Lake Powell, Lake Mead and water in the west. I am a concerned citizen and supporter of responsible water and energy infrastructure management. I am writing regarding the proposed alternatives for the Post-2026 Colorado River Operation Guidelines. It is important to recognize the role that the dams within the Colorado River Basin play in ensuring energy reliability, irrigation, water storage, navigation, and regional economic stability. I appreciate the Bureau of Reclamation recognizing BlueRibbon Coalition's Path to 3588' Plan as an alternative considered and recreation as a whole in alternatives analyzed. Glen Canyon and Hoover Dam and the Colorado River Basin, face growing pressure from radical environmental activists and anti-dam interests who seek its decommissioning. These calls threaten the dam's essential functions on the Colorado River system, therefore we appreciate BOR recognizing that moving to a one dam system would not yield a resilient system and would be bad for the environment and the economy. As a recreation user, I support any alternative that recognizes and supports recreational opportunities within the Colorado River Basin. The Supply-Driven, Max Operational Flexibility and Enhanced Coordination Alternatives all identify release levels based off of low water levels, shortages or low inflows which will better protect the dams critical infrastructure. I support any alternative or blend of alternatives in which releases are based off of real water inflows and not maximum deliveries that could hurt the water storage system and ultimately recreation. I support keeping the most water in the reservoirs for recreation as possible. The nation cannot afford to treat these critical infrastructure assets as bargaining chips in speculative environmental campaigns. Lake Powell and Lake Mead are too important to lose, and its operation must be protected. I'm a native of Southern Utah and want to share my thoughts about Lake Powell. It is a vital source of not only water, but more importantly it's a huge source of clean energy in a world where we need more and more energy every day!!! Better than solar, better than wind, this hydro electric energy source is one of our best and cleanest sources of electricity and should be protected as such. Lake Powell is a vital part of our economics. Not only would Page Arizona be devastated, but communities as far away as Kanab, my home town, would suffer greatly. Much of the towns infrastructure is built around people traveling to lake Post-2026 Colorado River 1514 of 5176 Powell for boating and other activities. While it could be argued that the original building of the dam hid some natural wonders or historically sensitive sites, but draining the lake and decommissioning of the dam can never truely restore what was lost and would only leave a vast scar that can never be removed without also destroying what has already been lost. At a time when inflation is high, energy consumption is growing, water is scarce. We need Lake Powell. At a time when the world is becoming more unstable and AI and social media are becoming more toxic, we need more places to step away from the fake digital worlds that breed depression, anxiety and fear and encourage more physical recreation in natural places of beauty, which in turn are healing! We can simultaneously respect and honer the peoples of the past, the engineering marvel and the blessed opportunity we have today for outdoor recreation that heals the soul, and be grateful for a clean source of energy. I hope you consider all the positive impacts the lake has brought, and the dangers it would have to "reclaim" the area. While we can pine for the past, this is one instance that going back would destroy lives, decimate communities, harm the environment and divide our country even more. Thank you for your time Nathan Riddle Post-2026 Colorado River

Letter #: 8844

Date Received: 3/3/2026

Sender Names: 8753: Amelia Rieger

Emails: 8753: ameliarieger1111@gmail.com

Organizations:

Subject: Comment for Post 2026- Guidelines and Strategies for Lake Powell and Mead

DOI - . I am writing this letter in concern for the future of the Colorado River, and the potential strategies of managing Lake Powell and Mead. The Colorado Basin stars need a serious change in water management and allocation in order to preserve the lives and businesses of millions of Americans. According to drought.gov, the Colorado River supports 16 million jobs, and contributes 1.4 trillion dollars to the American economy. However, it has been pushed to its limit. Currently, Lake Powell is at 3,530 feet above sea level. While this is not as low as it has been in the past, there is a potential for it to reach record lows this summer, and to mot generate electricity. Additionally, water is being wasted on agricultural practices that are not suitable for the environment. Currently, 80% of the Colorado River is being used for agricultural practices. According to food and water watch, Alfalfa farms consumed 2.1 trillion gallons of water across the basin states, which is enough water to supply the basins population for nearly 3 years. Agriculture is a crucial part of the economy for the Southwest, and I am by now means suggesting that we abandon farmers or force them out of their homes. However, we do need to make adaptations. One of Americas greatest strengths is our ability to overcome any obstacle that is thrown at us, and to constantly adapt. In this situation, we must adapt by incentivizing farmers to grow crops with lower water usage, and by utilizing water saving irrigation methods. I must admit, I am not a hydrologist, nor a water resources engineer. But I know the current state of water in the Southwest, and we have to take drastic measures to manage it. These include pushing incentives for low water usage agricultural practices and lowering water allotments for inefficient agricultural practices (large scale dairy and alfalfa). The key to leading a thriving future in the Southwest is to adapt to our current situation, rather than to continue living in Denial.

Letter #: 7365

Date Received: 3/2/2026

Sender Names: 7325: Anna Riethmiller

Emails: 7325: ariethmiller@yahoo.com

Organizations:

Subject: Colorado River Water

DOI - . I am against the state of Arizona's water being cut while other states refuse to share the obligation. I am asking for fairness. Thank you, Anna Riethmiller

Letter #: 4064

Date Received: 2/27/2026

Sender Names: 4019: Colton Roberts

Emails: 4019: robertscolt65@gmail.com

Organizations:

Subject: Our water resources should not go to states that choose not to collect their own. And we can't afford to let the water run this low and not run the hydro pumps. Please fill our lake back up and bring back the economy that comes with it thank you!!

DOI - .Sent from my iPhone

FORMAL COMMENTS ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT

Post-2026 Colorado River Reservoir Operations

Focus: Unaccounted SWP/MWD Exchange Water Deliveries to CVWD, End-Use Profligacy, Governance Conflicts, and Federal Supremacy Under Structural Shortage

Submitted by: Randall ("Randy") Roberts
Date: February 13, 2026
Submitted to: U.S. Bureau of Reclamation, Department of the Interior

EXECUTIVE SUMMARY

The Draft Environmental Impact Statement (DEIS) for Post-2026 Colorado River Reservoir Operations is legally and analytically incomplete. It fails to quantify, model, or regulate a basin-material delivery pathway that exposes the Colorado River to over 600,000 acre-feet of annual demand from a single California district—a volume that exceeds the entire basic apportionment of the State of Nevada and approaches the combined annual shortage reductions contemplated across the Lower Basin.

> ***A single local district's potential access to 600,000+ acre-feet of Colorado River water is not a localized accounting issue—it is comparable to Compact-state quantities and must be subjected to federal oversight, modeling, and shortage administration.***

This comment identifies five fatal analytical deficiencies in the DEIS, each of which independently requires correction before a legally defensible Record of Decision can issue:

1. Failure to quantify and model **the SWP/MWD/CVWD exchange pathway** that converts state-administered allocations into federally controlled Colorado River water (CRW) deliveries.
2. **Failure to disaggregate essential versus discretionary end uses**, treating golf course irrigation, surf parks, and decorative lagoons identically to domestic public health and food production.
3. **Failure to impose or analyze enforceable beneficial use standards**, despite longstanding western water law principles prohibiting waste.
4. **Failure to evaluate governance-driven implementation risk** where documented financial conflicts among a controlling board majority create foreseeable barriers to achieving claimed shortage reductions.
5. **Failure to assert federal supremacy** over a mechanism that permits state-level allocation decisions to function as a de facto driver of federal reservoir operations.

Absent these corrections, the Final EIS will fail NEPA's hard-look requirement and will be vulnerable to challenge as arbitrary and capricious under 5 U.S.C. § 706(2)(A).

I. Basin-Material Colorado River Volume: 600,000+ Acre-Foot Exposure

The Coachella Valley Water District (CVWD) publicly states that its federal contracted Colorado River supply was 432,850 acre-feet for 2022. The California Department of Water Resources' 2019 State Water Project Delivery Capability Report lists maximum Table A contract amounts of 138,350 AF for CVWD and 55,750 AF for Desert Water Agency (DWA)—a combined 194,100 AF per year.

Component	Annual Volume	Source
CVWD Federal Contracted CRW	432,850 AF (2022)	CVWD public disclosure
SWP Table A Maximum – CVWD	138,350 AF/yr	DWR 2019 Capability Report
SWP Table A Maximum – DWA	55,750 AF/yr	DWR 2019 Capability Report
Combined Exchange Bucket	194,100 AF/yr	DWR 2019 Capability Report
TOTAL POTENTIAL CRW EXPOSURE	**600,000+ AF**	**Direct + Exchange**

This combined volume exceeds the entire basic apportionment of Nevada (300,000 AF) and is comparable in magnitude to Compact-state quantities. The Supreme Court confirmed this comprehensive allocation framework in *Arizona v. California*.[1] Under structural shortage conditions, a volume of this magnitude is basin-consequential and cannot be treated as a localized accounting matter.

II. The SWP/MWD/CVWD Exchange Pathway Must Be Modeled Under Structural Shortage

A. The Exchange Mechanism

CVWD publicly explains that the Coachella Valley lacks a physical connection to State Water Project facilities. As a result, CVWD and DWA exchange their SWP entitlement "drop for drop" with Metropolitan Water District of Southern California (MWD) for an equal amount of MWD's Colorado River water allocation, delivered via the Colorado River Aqueduct to the Whitewater River turnout and then to groundwater replenishment facilities.[2]

B. Under Structural Shortage, This Pathway Is No Longer Hydrologically Neutral

Historically, the exchange could be operationally absorbed during periods of relative surplus. Today, the Basin is in sustained structural deficit. In this regime, any mechanism that predictably converts state SWP allocations into federally controlled CRW deliveries must be explicitly modeled and regulated within federal shortage administration. The DEIS's failure to quantify and integrate exchange-driven CRW into alternative analysis, shortage tiers, and accounting renders the analysis detached from real-world impacts and equity outcomes.

C. SWP Resilience Projects Will Amplify This Pathway

[1] Arizona v. California, 373 U.S. 546, 564–65 (1963) (Lower Basin apportionment under the Boulder Canyon Project Act).

[2] CVWD, "California's State Water Project" (describing drop-for-drop exchange and delivery via Colorado River Aqueduct). https://www.cvwd.org/170/Californias-State-Water-Project

The Delta Conveyance Project and Sites Reservoir are designed to increase the probability of higher realized SWP deliveries against Table A entitlements. Because SWP deliveries are the upstream trigger for drop-for-drop exchange deliveries of CRW to CVWD, greater SWP reliability foreseeably increases the frequency and magnitude of exchange-driven CRW deliveries.[3] The DEIS must evaluate these connected and cumulative effects rather than treating SWP operations as outside the federal analysis.

> ***If exchange-delivered CRW is not explicitly quantified and subjected to identical shortage reductions, the Secretary risks permitting a de facto state-level influence over federal reservoir operations.***

III. Discretionary and High-Evapotranspiration Uses Must Be Disaggregated

CRW within CVWD's service area supports more than 100 golf courses, resort and private country clubs, surf parks, private water-ski lagoons, decorative residential lagoons, water features, and intensive turf irrigation in extreme desert heat.[4] In a basin confronting sustained structural deficit, continued large-scale irrigation of ornamental turf and operation of open-water amenities represents profligate consumption—discretionary, non-essential, high-evapotranspiration demand that is distinguishable from domestic public health and safety use.

Documented Discretionary CRW Uses Within CVWD Service Area:

Use Category	Scale / Significance
Golf courses (public & private)	100+ courses; est. 90,000–100,000+ AFY
Surf parks & water-ski lagoons	Open-water features with extreme evaporative loss
Decorative residential lagoons	Year-round evaporation in 110°F+ summer heat
Resort/country club landscaping	Intensive turf with daytime sprinkler irrigation
Luxury residential water features	Non-essential, high-consumption amenities

The DEIS must disaggregate essential domestic use, agricultural production, groundwater replenishment, and discretionary/amenity consumption to satisfy NEPA's hard-look requirement.[5] Modeling shortages without examining whether demand is essential or discretionary treats golf course irrigation equivalently to food production and luxury landscaping equivalently to public health and safety—an approach that is arbitrary and capricious on its face.

Domestic Users Bear the Burden

CVWD's voluntary conservation program, which purported to reduce CRW use by up to 30,000 AF over three years (2024–2026), was implemented alongside the curtailment of 35,000 AFY of groundwater replenishment at the East Coachella Valley Replenishment Facility—water previously used to support drinking water aquifers serving disadvantaged communities. This curtailment

[3] DWR, "Delta Conveyance" (describing Delta Conveyance as climate adaptation to protect SWP reliability). https://water.ca.gov/deltaconveyance; U.S. Bureau of Reclamation, "Sites Reservoir" fact sheet (describing offstream reservoir to increase storage and improve supply reliability).

[4] CVWD, "Nonpotable Water for Golf Course Irrigation" (identifying 120 golf courses in the Coachella Valley and courses using Colorado River water). https://www.cvwd.org/639/Nonpotable-Water-for-Golf-Course-Irrigat

[5] Robertson v. Methow Valley Citizens Council, 490 U.S. 332 (1989) (NEPA's hard-look mandate).

effectively deprived domestic water users of essential resources while non-essential uses, including agriculture and golf course irrigation, reportedly gained access to an additional 5,000 AFY.[6]

> ***When conservation claims are achieved by curtailing drinking-water replenishment rather than reducing discretionary consumption, the DEIS's uncritical reliance on claimed reductions becomes a material analytical failure.***

[6]CVWD documentation and FPPC Form 700 filings (disclosing board-member financial interests in CRW-supplied farmland); CVWD Colorado River Water Conservation Program (documenting curtailment of 35,000 AFY groundwater replenishment at East Coachella Valley Replenishment Facility).

IV. Governance Conflicts Create Foreseeable Implementation Failure Risk

A 2018 advice letter from the California Fair Political Practices Commission (FPPC) concluded that a then-serving CVWD Board President was **prohibited from participating** in irrigation-related decisions because those decisions would have a reasonably foreseeable material financial effect on his real property and business interests within the project area. The letter further noted that at least two additional members of the five-member Board had potential conflicts concerning the same irrigation expansion decisions.[7]

The FPPC's Key Findings

- The Board President was trustor, trustee, and lifetime beneficiary of a trust owning 50% of a corporation controlling approximately 240 acres of CRW-supplied farmland within the project area.
- His business interests included income from entities providing services to operations on the affected land.
- The FPPC determined that the assessment decisions at issue would impose, repeal, or modify an assessment applicable to his real property interest—meeting the materiality standard under California conflict-of-interest law.
- At least two additional Board members had potential conflicts of interest under the same provisions, meaning a controlling majority (3 of 5) faced disqualifying financial interests in CRW-related decisions.

NEPA requires a hard look not only at modeled impacts, but also at whether assumed mitigation and conservation measures are realistic and enforceable. Where a controlling majority of the governing board has direct economic exposure to irrigation supply reductions, the risk of delayed, diluted, or non-verifiable reductions is foreseeable—not speculative. Under structural shortage conditions, this governance pattern becomes a basin-relevant factor because it affects whether large discretionary uses are actually reduced, or whether the burden is shifted to other users, other states, or to federal reservoir storage.

> ***Under 5 U.S.C. § 706(2)(A), documented conflict patterns create foreseeable implementation risk that must be evaluated under NEPA and cannot be ignored without risking arbitrary and capricious review.***

V. Federal Supremacy and Non-Delegable Authority

[7] California Fair Political Practices Commission, Advice Letter, File No. A-18-004 (Feb. 16, 2018), at 1–4 (concluding CVWD Board President prohibited from participating in irrigation-related decisions due to material financial conflicts; noting at least two additional Board members with potential conflicts).

The Boulder Canyon Project Act vests mainstream allocation authority in the Secretary of the Interior.[8] The Supreme Court confirmed this comprehensive allocation framework in *Arizona v. California*.[9]

If exchange-delivered CRW is not explicitly quantified and subjected to identical shortage reductions, the Secretary risks permitting a de facto influence over federal reservoir operations via state-administered allocation triggers. The exchange may be lawful as a contractual mechanism among California contractors; however, the Secretary must explicitly account for it, apply identical shortage reductions, and prevent it from undermining equitable shortage-sharing and reservoir protection objectives.

This is not a theoretical concern. The SWP/MWD exchange effectively allows California Department of Water Resources allocation decisions—made for state purposes and under state law—to trigger additional withdrawals of federally controlled Colorado River water. In a structural shortage regime, this mechanism functions as an off-book driver of federal CRW deliveries, potentially compromising U.S. compliance with the 1944 Treaty with Mexico and obligations to other basin states.

VI. Absence of Enforceable Beneficial Use Standards

The DEIS contains no mandates, benchmarks, or enforceable standards requiring beneficial use determinations, agricultural best practices, irrigation efficiency improvements, or reduction of wasteful or luxury water uses. Instead, the DEIS explicitly assumes full use of all entitlements regardless of efficiency, necessity, or public interest.

This approach is inconsistent with longstanding western water law principles requiring beneficial use without waste, federal trust responsibilities, and contemporary conservation and climate-resilience imperatives. The absence of any analysis or requirement regarding beneficial use by CVWD and other major contractors constitutes a fatal analytical flaw, particularly where shortages are imposed on other users while inefficient or discretionary uses remain unexamined and unconditioned.

[8] Boulder Canyon Project Act, 43 U.S.C. §§ 617–617t.

VII. REQUIRED AGENCY RESPONSES

The following responses must be addressed in the Final EIS prior to selection of a preferred alternative or issuance of a Record of Decision:

1. **Quantify Exchange-Delivered CRW.** For each alternative and hydrology scenario, quantify the annual volume of exchange-delivered CRW to CVWD (and DWA) via MWD, and identify where it is counted in federal water accounting.
2. **Apply Identical Shortage Reductions.** State explicitly whether exchange-delivered CRW is subject to identical shortage reductions and conservation conditions as direct federal contract deliveries. If yes, demonstrate the calculation mechanism; if no, explain why not.
3. **Disaggregate End Uses.** Disaggregate CVWD's CRW demand into essential domestic/public health and safety use, agricultural production, groundwater replenishment, and discretionary/amenity uses (golf courses, surf parks, lagoons, water features, luxury landscaping).
4. **Quantify Evaporative Losses.** Quantify evapotranspiration and evaporative losses attributable to high-ET end uses and evaluate reduction alternatives that prioritize elimination of waste and non-beneficial use.
5. **Evaluate Governance-Driven Implementation Risk.** Analyze implementation feasibility given documented board-member financial conflicts and a potential controlling voting majority; specify enforceable verification and audit requirements for claimed conservation reductions.
6. **Model SWP Resilience Project Impacts.** Analyze how SWP reliability improvements (including Delta Conveyance and Sites Reservoir) could change SWP delivery distributions and thereby increase exchange-triggered CRW deliveries; incorporate into cumulative impacts analysis.
7. **Impose Beneficial Use Standards.** Evaluate and require enforceable beneficial use and best-practices standards for CVWD, IID, and other major contractors as conditions of post-2026 operations.
8. **Circulate Revised Analysis.** Circulate any revised modeling and accounting that incorporates the exchange pathway for public comment prior to selecting a preferred alternative or issuing a Record of Decision.

VIII. Conclusion

The Colorado River is in sustained structural deficit. In this context, a single district's ability to access 600,000+ acre-feet of CRW—including exchange-driven deliveries triggered by state SWP allocations—cannot be treated as an accounting footnote. The DEIS must quantify and regulate this pathway, disaggregate discretionary demand from essential use, impose enforceable beneficial use standards, and address governance-driven implementation risk.

The combined failures to analyze end-use consumption, the SWP-CRW exchange mechanism, waste and non-beneficial use, and governance conflicts are not peripheral omissions—they are fatal analytical flaws. These issues must be disclosed, analyzed, and subjected to public review prior to selection of any preferred alternative, issuance of a Record of Decision, or implementation of post-2026 operating guidelines.

Absent these corrections, the Final EIS will not satisfy NEPA's hard-look requirement and will be vulnerable to challenge as arbitrary and capricious under the Administrative Procedure Act, 5 U.S.C. § 706(2)(A).[10]

Respectfully submitted,

Randall Roberts

Randall ("Randy") Roberts
February 13, 2026

[10] 5 U.S.C. § 706(2)(A) (arbitrary and capricious standard of review under the Administrative Procedure Act).

ATTACHMENTS AND EXHIBITS

The following documents are submitted as part of and incorporated into this comment:

- **Exhibit A:** California Fair Political Practices Commission, Advice Letter, File No. A-18-004 (February 16, 2018) — concluding CVWD Board President was prohibited from participating in irrigation-related decisions and noting additional Board member conflicts.
- **Exhibit B:** Memorandum: “Urgent Call for Transparency, Equity, Beneficial Use Mandates and Conservation in Colorado River Water Allocations to CVWD” (June 29, 2025) — documenting SWP/MWD exchange volumes, non-beneficial uses, governance conflicts, and groundwater replenishment curtailment.
- **Exhibit C:** Prior DEIS Comment Draft: “Fatal Omissions in the Post-2026 Colorado River Reservoir Operations DEIS” — outlining end-use analysis failures, SWP-CRW interactions, and absence of beneficial use standards.

Letter #: 14

Date Received: 1/19/2026

Sender Names: 13: Haleahy C. Robertson

Emails: 13: hcraven44@gmail.com

Organizations:

Subject: Re: FR Notice and Meeting Registration: Draft Environmental Impact Statement for Post-2026 Colorado River Operations

DOI - . Forego the old water rights. They are outdated and in no way, shape, or form, consider the dire straits of the current conditions. No more upper and lower basin. The Colorado River basin needs to be managed as one. Make reasonable cuts and distribute water proportionally. Long term:Build river level diversion at Glen Canyon Dam for when reservoir is at dead pool, so that we can continue to release water downstream. Build a smaller reservoir at Wahweap, build solar fields in the vast bays closer to the dam. Use solar to pump water up at wahweap reservoir during the day and then let water run for power during night. The Colorado River can no longer be managed based on antiquated laws that had no foresight for this reality. Come on now. Time to move into the future. Haleahy Robertsonhcraven44@gmail.com610-613-26751687 E. Ridgemark Drive, Sandy, UT 84092On Fri, Jan 16, 2026 at 10:26 AM BOR DRO CRB Post 2026 Mailbox <bor-sha-crbpost2026@usbr.gov> wrote:The Bureau of Reclamation's Post-2026 Draft EIS was published in theFederal Register today, January 16, 2026. This initiates the 45-day public comment period, which will close on March 2, 2026. Comments may be submitted via the following methods: Email to: crbpost2026@usbr.govTelephone: (602) 609-6739Mail to: Bureau of Reclamation, Attn: BCOO-1000, P.O. Box 61470, Boulder City, NV 89006Reclamation will hold two virtual public meetings to provide information on the Draft EIS. The schedule and registration links are provided below. Virtual meeting --Thursday, January 29, 2026, at 1:00 - 3:00 p.m. Mountain Time (Registration Link:https://swca.zoom.us/webinar/register/WN_0YXCatFjSFC5Y_SYgcjS5g#/registration)Virtual meeting --

Tuesday, February 10, 2026, at 5:30 - 7:30 p.m. Mountain Time (Registration Link:https://swca.zoom.us/webinar/register/WN_ompDKGbEQzWwBf_5cKOT1w#/registration)

Additionally, an interactive tool designed to allow for easy comparison of figures across the Post-2026 Draft EIS has been posted to the project website:Draft Environmental Impact Statement - Post 2026 Colorado River Operations | Bureau of Reclamation. This tool can be accessed directly here:CRB Post-2026 Draft EIS Figure Viewer For further information, contact the project team by email atcrbpost2026@usbr.gov or call the project telephone line at (602) 609-6739.-- Haleahy Craven Robertsone: hcraven44@gmail.comp: 610-613-2675

Letter #: 3718

Date Received: 2/27/2026

Sender Names: 3681: Cheryl Robison

Emails: 3681: beaglemom@charter.net

Organizations:

Subject: Colorado River

DOI - . You must preserve the Colorado watershed and prevent water loss by inconsequential planning. There is insufficient water now, and there will be even less in the future. Make intelligent and fair decisions, especially concerning Native American tribes in the area. Sincerely, Cheryl Robison Sent from my iPad

Letter #: 345

Date Received: 2/17/2026

Sender Names: 343: Miguel Rodriguez

Emails: 343: knitekillah@gmail.com

Organizations:

Subject: Public Comment

DOI - . Hello,With Lake Mead and the Colorado River at historic lows, I believe it is time for stronger limits on the amount of water allocated to California. While all states rely on this shared resource, current usage levels are not sustainable and place the entire region at risk.States like Nevada have made major investments in conservation and water recycling, yet continue to face cuts. For fairness and long-term stability, California should be held to stricter conservation requirements and reduced allocations that reflect today's water reality--not agreements made under much wetter conditions.Protecting this water supply now is critical to the future of our communities, agriculture, and ecosystems. I urge your office to support policies that ensure responsible and equitable water use across all basin states.Miguel Rodriguez

Letter #: 3667

Date Received: 2/26/2026

Sender Names: 3630: Dirk Rogers

Emails: 3630: 1dog2dogs3dogs@gmail.com

Organizations:

Subject: pathological self destruction.

DOI - . Protect the Colorado River'Dirk Rogers RN Retired

Letter #: 3215

Date Received: 2/27/2026

Sender Names: 3185: Gabrielle Roh

Emails: 3185: info@greatbasinwater.org

Organizations:

Subject: Gabrielle Roh Comments on Colorado River

Great Basin Water Network DOI - . There are NO good
options in this DEIS Colorado River Reservoir. Water availability. Air quality. Water quality.Who are you protecting? Certainly not our future generations. Certainly not anyone in the Lower CR. Everything about this is LOUSY.If you have any additional questions please contact me.Gabrielle
Roh(c) Great Basin Water Network. Powered by weForms.

Letter #: 8374

Date Received: 3/2/2026

Sender Names: 8289: Veronica & Lucio romero

Emails: 8289: lrvsr1@yahoo.com

Organizations:

Subject: Privacy

DOI - . Please do not use, share or sell our personal information in any way shape or form. Thank you, Lucio and Veronica

Letter #: 3662

Date Received: 2/26/2026

Sender Names: 3625: Peg Rooney

Emails: 3625: drpeg12@gmail.com

Organizations:

Subject: Colorado River Draft EIS

DOI - . The Colorado River provides drinking water for 40 million people and is the lifeblood of residents and wildlife of arid Western states. As a birder and lover of the outdoors, I see first hand how decreased water supplies are impacting birds and other wildlife.As you know the Colorado River Basin has record-low reservoir levels, collapsing aquatic habitats, reduced snowpack, drought, pollution, and a much-feared unreliable water supply.The draft EIS as presented does NOT reflect the reality of water scarcity, nor does it prioritize clean water and ecosystem health. It simply divides up a shrinking supply.Instead of letting water become the new gold, the Bureau must address the crisis! It must also identify the preferred alternative so we, the people, can comment on it.Like so many things in this administration, this appears to be an attempt to bulldoze this draft EIS through without adequate time for reflection and comment.Instead, how about considering some real solutions:-Use climate science and realistic supply projections-Protect water quality and reduce pollution impacts as flows decline-Prevent further ecological collapse in the Colorado River Delta and Basin tributaries.-Respect Tribal water rights-Prioritize conservation over unsustainable allocationsThe River won't sustain us for much longer. Stop playing politics and protect it.Dr. Peg RooneyPenrose, CO

To: The Bureau of Reclamation
crbpost2026@usbr.gov

RE: Comments on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for the Colorado River

March 2, 2026

To the Bureau of Reclamation:

I am writing to submit comments[1] on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (DEIS) publicly released by the Bureau of Reclamation (Reclamation or USBR) and the U.S. Department of the Interior (Interior) on January 9, 2026.[2] My comments are focused on issues related to the Salton Sea, and the failure of Reclamation to include in the DEIS the legally mandatory analysis of the cumulative and significant impacts on the Salton Sea, its ecosystem, the fish and wildlife reliant on that ecosystem, the regional environment, the climate, and people throughout the surrounding area—all of which impacts will foreseeably result from implementation of the post-2026 operational guidelines for management of the Colorado River (hereinafter "the Post-2026 Program").[3] I am providing considerable detail in these comments in order to help guide an appropriate analysis of those issues in a revised DEIS for the Post-2026 Program, which I suggest is essential for Interior and Reclamation to prepare expeditiously.

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[1] Please note that I do not represent or speak on behalf of any interested individual, organization, company, or government entity. I submit these comments solely as a concerned citizen, and as someone who has spent many years objectively analyzing the scientific, factual, legal, and policy issues relating to the past, present, and future of the Salton Sea and the Colorado River.

[2] Available at: https://www.usbr.gov/ColoradoRiverBasin/post2026/draft-eis/index.html.

[3] Although Reclamation has primary responsibility for managing the Colorado River, I refer throughout these comments to both Interior and Reclamation to emphasize the role of the Interior Secretary and to emphasize that other agencies in the Department of the Interior in addition to Reclamation have important expertise and responsibilities relevant to Salton Sea issues.

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I. The DEIS fails to satisfy the urgent need for the Post-2026 Program, and does not comply with applicable law; therefore, a revised DEIS is required

The Colorado River, and the roughly 40 million people who depend on its water, are unquestionably teetering at the brink of catastrophe. Reservoirs are already at perilously low levels, and the effects of climate warming on the hydrology of the Colorado River Basin are reducing the river's streamflow to the point that Lake Powell may soon drop to a critical elevation that threatens the ability of Reclamation's infrastructure to safely move water downstream to serve even the basic health and safety needs of more than 25 million people in the United States and Mexico. If that foreseeable emergency scenario materializes, Glen Canyon Dam will face high risk of disastrous structural damage, and Interior and Reclamation will be obliged to drastically reduce allocations of water to the Lower Basin states and Mexico, a situation which will cause major injurious consequences for people across those regions and devastating harm to fish and wildlife.

The DEIS explains that the Post-2026 Program is necessary in large part because:
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> *The 2007 Interim Guidelines have not sufficiently reduced risk:* Based on operational experience since 2007, the current guidelines are not robust enough to manage the system 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.[4]

In addition, the DEIS explicitly recognizes that the Post-2026 Program must account for the fact that climate warming and associated aridification are adversely affecting the Colorado River Basin's hydrology, and are causing significant and ongoing reductions in Colorado River streamflow that are projected to worsen substantially in the future:

> *Imbalance between water supply and demand will be exacerbated by increasingly likely low-runoff conditions:* The Basin is experiencing increased aridity due to climate variability, and long-term drought and low-runoff conditions are expected in the future. These conditions will exacerbate the now widely recognized imbalance between water supply and demand in the 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.[5]

Similarly, the DEIS states that the purposes of the proposed federal action include to "[p]rovide Colorado River water users a greater degree of predictability with respect to annual water availability in future years under anticipated increasing variability, low runoff, and low-reservoir conditions."[6]

Based on the inability of the Colorado River Basin states to reach an agreement among themselves regarding the details of the Post-2026 Program prior to the February 14, 2026 deadline set by Interior and Reclamation, it currently appears likely that Interior and Reclamation will be proceeding with the Basic Coordination alternative presented in the DEIS as the proposed federal action for the Post-2026 Program. Reclamation has stated the Basic Coordination alternative is the only action alternative that the agency has the authority to implement in the absence of agreement among all the Basin states.

However, the Basic Coordination alternative is insufficient to achieve the purposes of the Post-2026 Program because that alternative fails to meet key performance objectives in approximately 30% to 35% of Dry-year scenarios and approximately 40% to 75% of Critically Dry-year scenarios,[7] pursuant to the definitions of "Dry" and "Critically Dry" in the DEIS. In addition, Reclamation's modeling makes clear that none of the other alternatives evaluated in the DEIS—regardless of the severity of the water-use cutbacks they require—properly satisfies the need for the Post-2026 Program and performs well under all reasonably foreseeable hydrological conditions.[8] Reclamation has explicitly recognized that fact by publicly stating, "In Critically Dry periods, all alternatives have unacceptable performance."[9]

In formulating the Post-2026 Program, Interior and Reclamation must consider "the fact that 50% of the individual years of the 21st century (2000-2025) have been Dry or Critically Dry (including 2020, 2021, 2022, 2024, 2025) and only 27% of the years (including 2017, 2019, 2023) have been Moderately Wet or Wet…The *average flow* for the past six years (2020-2025) was 10.8 MAF/year, *less than the median reported*

[4] DEIS, Executive Summary, section ES.1.1, page ES-4.

[5] DEIS, Executive Summary, section ES.1.1, page ES-4.

[6] DEIS, Executive Summary, section ES.1.1, page ES-5.

[7] DEIS, Executive Summary, Figure ES-5.

[8] DEIS, Executive Summary, Figure ES-5; DEIS, Ch. 3, Figures 3-8, 3-10, 3-13, 3-15.

[9] Statement by Carly Jerla, Reclamation EIS Coordinator, at the virtual public meeting on the DEIS, January 29, 2026.

for the Dry category."[10] Moreover, Interior and Reclamation must also account for the fact that scientific studies regarding the future impacts of climate warming on the Colorado River have projected that aridification will continue to cause major additional reductions in streamflow in the coming years. For example, a 2020 study found that by mid-century (2036-2065) Colorado River streamflow could decrease more than 30% in relation to the 1913-2017 mean, and potentially by as much as 40%.[11] Another recent study found that, estimated conservatively, Colorado River streamflow will shrink at least 20% more by mid-century than it has already, and 35% more by the end of the century; and potentially the river's flow could suffer even more significant declines of over 30% by mid-century and 55% by later in the century.[12]

Regardless of whether the Basic Coordination alternative, a different alternative presented in the DEIS, or another alternative not yet released to the public is ultimately adopted as Reclamation's preferred federal action for the Post-2026 Program, it is clear Salton Trough rights holders that are subject to the terms of that program—the Imperial Irrigation District (IID or the District) and the Coachella Valley Water District (CVWD)—will be called upon to reduce their use of the river's water, because such cutbacks will be necessitated by the dire water-shortage crisis affecting the Colorado River.[13] Therefore, **as used in these comments, the phrase "the Proposed Action" encompasses all potential action alternatives for the Post-2026 Program that Interior and Reclamation may adopt and that entail reductions in use of Colorado River water by Salton Trough rights holders, whether or not such action alternatives are presented in the current DEIS.**

It is clearly foreseeable both factually and scientifically that Reclamation's Proposed Action will have cumulative and significant harmful impacts on the Salton Sea, the Salton Sea ecosystem as defined by law,[14] fish and wildlife reliant on the Salton Sea ecosystem (including but not limited to species already designated as endangered and threatened under federal and state law), the regional environment, the climate, and more than half a million people throughout the surrounding area—including Tribes, to whom the federal government owes legally mandatory trust obligations. (When the foregoing impacts are referred to collectively in these comments, the phrase "Salton Sea Impacts" will be used for brevity.) Furthermore, and crucially, many of the injurious Salton Sea Impacts that are very likely to result from the Proposed Action will be devastating and irreversible.

Reclamation and Interior are obligated under the National Environmental Policy Act (NEPA) and other applicable law to fully evaluate the Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action, and to identify and implement measures that will serve to avoid, or effectively minimize and fully mitigate, those consequences. Compliance with those obligations is particularly crucial given the context in which the Post-2026 Program will be implemented—involving more than two decades of failures by responsible government agencies to restore the Salton Sea as statutorily mandated, or even to implement legally required mitigation of the harmful consequences of ongoing water transfers and other water-use reduction agreements instigated and approved by Interior and Reclamation. But despite their legal obligations, Interior and Reclamation have completely, summarily, and unjustifiably abdicated their duties in the DEIS, and have explicitly stated that "analysis of impacts on the Salton Sea is not included in this EIS."[15]

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[10] Comments on the DEIS submitted to Reclamation on February 27, 2026 by A.J Castle, J. Fleck, R.E. Kuhn, J.C. Schmidt, K. Sorenson, and K. Tara. Emphasis added.

[11] Milly, P.C.D. and Dunne, K.A. (2020). Colorado River flow dwindles as warming-driven loss of reflective snow energizes evaporation. *Science* 367(6483), 1252-1255, https://doi.org/10.1126/science.aay918.

[12] Udall, B. and Overpeck, J. (2017). The twenty-first century Colorado River hot drought and implications for the future. *Water Resources Research* 53, 2404–2418, https://doi.org/10.1002/2016WR019638.

[13] It is also clear that Mexico, the third Colorado River water user in the Salton Trough, will also be called upon to decrease use of the river's water pursuant to a legal process distinct from the Post-2026 Program.

[14] The Salton Sea ecosystem includes the lake and its lakebed, tributary streams and agricultural drains, associated riparian areas and wetlands, and farm fields in the IID service area. (California Fish & Game Code § 2931(d).)

[15] DEIS, Chapter 3, Section 3.2.7, page 3-22.

The primary focus of the DEIS should have been on evaluating in detail how the included alternatives perform during Dry and Critically Dry periods, as well as on developing and analyzing measures to avoid, or minimize and fully mitigate, the harmful consequences of implementing alternatives that do not perform satisfactorily in Dry and Critically Dry periods. The evaluated harmful consequences should have included the foreseeable, cumulative, and significant injurious impacts on the Salton Sea, its ecosystem, the fish and wildlife reliant on that ecosystem, the regional environment, the climate, and people throughout the Salton Sea area.

Because the necessary analyses were not included in the DEIS, it is necessary for Interior and Reclamation to prepare and issue a revised DEIS. The revised DEIS should present at least one action alternative that will meet all key performance objectives in Dry and Critically Dry years, and is within the existing legal authorities of Interior and Reclamation to implement in the absence of agreement among all Basin states. If the current legal authorities of Interior and Reclamation are not adequate to implement any alternative that will meet key performance objectives in Dry and Critically Dry years, the agencies should publicly explain what additional authorities are needed and should expeditiously obtain them.

Based on the information and analysis presented in the DEIS, along with other pertinent facts and science, for Interior and Reclamation to proceed with any Proposed Action entailing reduced Colorado River water use by Salton Trough rights holders, while neglecting to fully analyze the associated Salton Sea Impacts and failing to commit to avoiding, or effectively minimizing and fully mitigating, those impacts would be an arbitrary and capricious abuse of discretion that would violate applicable law, endanger the health and even the lives of more than half a million people including members of federally recognized Tribes, damage the environment and the climate, and jeopardize the continued survival of fish and wildlife populations, including species that are already at risk of extinction.

II. Crucial context: The worsening Salton Sea crisis and the failure to remedy it

It is not possible to analyze appropriately the significance of the Proposed Action's Salton Sea Impacts without fully accounting for the context in which the Proposed Action will occur. Most importantly, Reclamation is legally required to consider the nature and severity of the environmental, ecological, and public-health effects of previous and ongoing reductions in the inflow to the Salton Sea, the additive impacts of the new decreases, and the potential synergistically harmful interactions of the additional cutbacks with the existing ones. Reclamation has not properly accounted for these issues in the DEIS, and the agency's failure to do so violates federal law.

A fundamental misconception about the Salton Sea that insidiously affects much discussion of the lake's future is the widespread but erroneous belief that the lake is unnatural. This notion that the Salton Sea is a man-made body of water created accidentally at the beginning of the 20th century is both factually and scientifically wrong. Furthermore, the lake does not owe its existence to 20th-century Colorado River infrastructure, even though it is now dependent upon Colorado River wastewater. As I explained in a peer-reviewed scientific study published in 2020,[16] when the Colorado River flooded into the Salton Basin in 1905-1907, enhancing the size of a lake containing Colorado River water that already existed there,[17] the river was simply behaving in

[16] Ross, J.E. (2020). Formation of California's Salton Sea in 1905-07 was not "accidental." In: Miller, D.M. (Ed.), *Proceedings of the 2020 Desert Research Symposium*, Desert Symposium, Inc., pp. 217-230. (Available open-access online at: https://www.researchgate.net/publication/340038533_Formation_of_California's_Salton_Sea_in_1905-07_was_not_accidental.)

[17] See, e.g., Bailey, G. E. (1902). *The Saline Deposits of California*. California State Mining Bureau Bulletin No. 24. 187 pages. The frontispiece relief map of this 1902 book depicts the large lake that was present in the Salton Basin prior to the 1905-1907 flooding. The text on pages 122-124 discusses that lake and the salt harvesting operations adjacent to it, and a photograph at the top of page 123 shows the lake in the distance and the salt deposits in the foreground. Note that the lake was already known as the "Salton Sea" prior to the 1905-1907 flooding. A large body of evidence (some of which is summarized in Ross, 2020 supra) contradicts the common but misguided notion that the 1905-1907 floodwaters flowed into a dry basin that had not held a lake since "ancient" times.

the same manner it had for millions of years. Geologic evidence establishes that the northern Salton Trough, containing the Salton Basin in which the Salton Sea lies, became a natural part of the Colorado River's hydrologic system about five million years ago when the river first arrived at the Gulf of California.[18] As the river meandered throughout its delta region, which gradually became uniquely bifurcated into northern and southern lobes as the result of tectonic processes,[19] its waters flowed into the Salton Basin and sustained vast estuarine, deltaic, lacustrine, and other aquatic and wetland ecosystems. That important hydrologic connection between the Colorado River and the Salton Basin continued to exist for millions of years until the river was intentionally prevented from flowing into the Salton Basin anymore in the 20th century.

The Colorado River's natural hydrologic regime across its delta region, and the rich aquatic and wetland ecosystems in the Salton Basin—including enormous lakes—that the river created and supported, were abruptly altered forever when the river's route into the northern Salton Trough was deliberately and permanently blocked. Preventing the Colorado River from flowing naturally into the Salton Basin as it had done for millions of years—and as it continued to do on an ongoing basis through the early 20th century—was a primary motivating factor for the Boulder Canyon Project Act and the construction of Hoover Dam and other key infrastructure on the river.[20] That 20th-century water-management infrastructure enabled the Colorado River Basin states to develop in the manner they have during the past one-hundred years. But fully controlling the Colorado River, permanently severing its natural connection with the Salton Basin, and exhaustively exploiting the river's water also sealed the fate of the Salton Sea; the demise of the lake and the collapse of its ecosystem were assured without additional human intervention.

Ever since full control of the Colorado River was attained using Reclamation's infrastructure, the Salton Sea and its essential ecosystem have been reliant on very large quantities of Colorado River wastewater flowing into the central Salton Basin as a result of the use of the river's water by IID, CVWD, and Mexico. Because IID's Colorado River water entitlement is by far the largest among those users as a result of the District's very senior water rights, IID's use of the river's water is essential for sustaining the Salton Sea. Approximately 85% of the Salton Sea's inflow is wastewater that derives directly from Imperial County's use of Colorado River water in IID's service area.[21]

Despite intentional banishment of the Colorado River from its natural course into the Salton Basin, ongoing inflow of Colorado River wastewater into the basin throughout the 20th century and during the first portion of the 21st century enabled the Salton Sea to continue supporting millions of migratory and resident birds and hundreds of millions of fish, including threatened and endangered species. The Salton Sea is situated in a critical location for avian migration, at the juncture of the Pacific Flyway and the Intermountain West. Accordingly, more than 400 species of birds rely on the Salton Sea ecosystem—most, if not all, of them the same species that have used aquatic and wetland habitats in the Salton Basin for millions of years, as the

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[18] Crow, R.S. et al. (2021). Redefining the age of the lower Colorado River, southwestern United States. *Geology* 49(6):635-640, https://doi.org/10.1130/G48080.1. See also: Dorsey, R.J., et al. (2018). Punctuated Sediment Discharge during Early Pliocene Birth of the Colorado River: Evidence from Regional Stratigraphy, Sedimentology, and Paleontology. *Sedimentary Geology* 363:1-33, https://doi.org/10.1016/j.sedgeo.2017.09.018.

[19] Tectonic processes occurring at the boundary of the Pacific and North American plates, primarily manifested by movement along faults in the San Andreas fault system, caused the Colorado River's delta region to gradually transform from a typical fan shape into two hydrologically connected lobes that are now located to the north and south of the U.S.-Mexico border. The northern delta lobe in the northern Salton Trough contains the below-sea-level Salton Basin and Salton Sea, as well as the Imperial Valley; the southern delta lobe contains the Mexicali Valley and the subaerial delta region typically referred to as "the Colorado River delta," as well as the subaqueous delta at the head of the Gulf of California. See, e.g., Winker, C.D., and Kidwell, S.M. (1986). Paleocurrent evidence for lateral displacement of the Pliocene Colorado River delta by the San Andreas fault system, southeastern California. *Geology* 14:788-791.

[20] See, e.g., LaRue, E.C. (1925). *Water, Power and Flood Control of Colorado River below Green River, Utah*. Washington: Government Printing Office. 171 pages.

[21] California Natural Resources Agency (2025), Salton Sea Management Program 2025 Annual Report, p. 69. Annual data for 2024 indicate that 85.37% of the inflow to the Salton Sea derives from IID's use of Colorado River water. Updated annual data for 2025 are not yet available.

fossil record shows. Moreover, as lakes and wetlands across the western United States have withered since the 19th century, and many have vanished, the Salton Sea has transitioned from being ecologically important to being indispensable for the continued survival of numerous species.

As expanding development in the lower Colorado River Basin states increasingly tightened water supplies by the turn of the 21st century, California was pushed to adopt the multiparty 2003 Quantification Settlement Agreement (QSA) to ensure that the Golden State would not exceed its total annual allotment of 4.4 million acre-feet of Colorado River water. As required by the QSA and related water transfer agreements, and in accordance with the 2007 Colorado River Interim Operating Guidelines and additional voluntary agreements with Reclamation, since 2003 IID has conserved over 9.1 million acre-feet of Colorado River water that the District would otherwise have been legally entitled to use.[22] Pursuant to the QSA, IID will continue to transfer nearly 500,000 acre-feet of water annually to Southern California urban areas for decades to come. In order to conserve the volume necessary for the continuing QSA water transfers, IID has implemented various permanent water conservation measures (including, but not limited to, concrete lining of canals), and approximately 70% of irrigated farmland in IID's service area has been actively participating in the District's ongoing on-farm water-efficiency program designed to substantially decrease the amount of Colorado River water applied to agricultural fields in Imperial County.[23] Moreover, for 2025, IID received farmers' applications for 79.3% of the cropped acreage in the Imperial Valley to be included in the on-farm water-efficiency program.[24] Additionally, from 2023 through 2026, in collaboration with Imperial County farmers and with Reclamation's approval,[25] IID voluntarily undertook further measures to conserve more than 800,000 acre-feet of Colorado River water by implementing additional system conservation and deficit irrigation (partial fallowing) programs to help prop up the level of Lake Mead. Those additional IID water conservation programs implemented in 2023-2026 will add a grand total of 12 feet to Lake Mead's elevation.[26]

But as the amount of Colorado River wastewater flowing into the central Salton Basin shrinks, inevitably so does the Salton Sea. Thus, because of the major reductions in IID's use of Colorado River water mandated by the QSA and resulting from other recent water-use reductions approved by Reclamation, the Salton Sea is shriveling, its salinity is rapidly rising, the ecosystem is collapsing, and increasingly vast expanses of desiccated lakebed are polluting the air with hazardous dust containing toxic and carcinogenic components. Consequently, serious harm is occurring to fish and wildlife dependent on the Salton Sea ecosystem, and the health and economic well-being of more than half a million people living and working near the shrinking lake are in jeopardy.[27]

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[22] Pers. Comm. T. Shields, IID Water Department Manager, February 24, 2026. That provisional figure is for the amount conserved from 2003 through the end of 2025. When available, the final data will be posted at: https://www.iid.com/water/water-conservation.

[23] Draft Environmental Assessment of the IID 2024-2026 Temporary Colorado River System Water Conservation Project (Draft EA), pages 34 and 98.

[24] Pers. Comm. T. Shields, IID Water Department Manager, February 24, 2026.

[25] The relevant contracts between IID and Reclamation are: (a) the December 2023 System Conservation Implementation Agreement (2023 SCIA) between the United States and Imperial Irrigation District, and other related agreements, pertaining to Colorado River water conservation by IID during calendar year 2023; and (b) the August 2024 System Conservation Implementation Agreement (2024-2026 SCIA) between the United States and Imperial Irrigation District, and other related agreements, pertaining to Colorado River water conservation by IID during calendar years 2024-2026.

[26] Presentation by T. Shields, IID Water Manager, at the December 2025 Colorado River Water Users Association Annual Meeting, and pers. com. T. Shields, February 24, 2026.

[27] The following description of Salton Sea Impacts is not intended to be an exhaustive itemization of all the harmful effects on the Salton Sea ecosystem, fish and wildlife, the environment, the climate, and people throughout the surrounding region that are resulting from reductions in Salton Sea inflows and will be significantly exacerbated by the Proposed Action.

- Since the QSA water transfers started in 2003 (and primarily since those transfers ramped up rapidly in volume beginning in 2018), the area of the Salton Sea has decreased by approximately 65 square miles (41,800 acres), and the elevation of the lake's surface has dropped by nearly 15 feet.[28]
- Communities throughout the Salton Sea region, including but not limited to Tribes, are suffering significant, disproportionate, and unremedied negative effects on their health and socioeconomic well-being because of: (a) the QSA water transfers and additional recent Colorado River water cutbacks that have occurred pursuant to contracts between Reclamation and IID; (b) the resulting shrinkage of the Salton Sea, the ongoing collapse of the Salton Sea ecosystem, and the related deterioration of water quality in the lake, its tributaries, and associated wetlands and riparian areas; (c) pollution of the region's air by hazardous, toxic, and carcinogenic contaminants being emitted from exposed Salton Sea lakebed and the deteriorating lake itself; and (d) related impacts on the region's economy.
- Adverse impacts of freshwater deprivation on the Salton Sea, its tributaries, and associated wetlands and riparian areas are adversely affecting water quality and are impairing a variety of key biological systems necessary for supporting hundreds of species that depend on the Salton Sea ecosystem for essential aspects of their lives, including feeding and breeding.
- The salinity of the Salton Sea has risen so high—to a level more than double the salinity of ocean water—that the hundreds of millions of fish previously living there have been decimated, and they are now almost completely extirpated from the lake. Ongoing increases in salinity and other changes in water quality also threaten invertebrate populations that provide essential food for fish and birds dependent on the Salton Sea ecosystem—including species that are already endangered, threatened, or of special conservation concern under federal and state law.
- Degradation and loss of habitat in the Salton Sea ecosystem poses an existential threat to millions of migratory birds that have nowhere else to feed and recuperate in a vast arid region they must traverse twice-yearly during their long journeys. All of those birds are protected under the federal Migratory Bird Treaty Act and many of them are species designated as endangered, threatened, and/or of special conservation concern under federal and state law.
- Piscivorous birds reliant on the Salton Sea can no longer obtain sustenance that is crucial for their survival because the Salton Sea's fish population has crashed. The affected fish-eating bird species include, but are not limited to, Special Status Species such as the American white pelican (*Pelecanus erythrorhynchos*), the black skimmer (*Rynchops niger*), the gull-billed tern (*Gelochelidon nilotica*), the double-crested cormorant (*Nannopterum auritum*), and the wood stork (*Mycteria americana*); as well as Fully Protected Species in California such as the California brown pelican (*Pelecanus occidentalis californicus*).
- The shrinkage of the Salton Sea and the water quality problems in the lake, its tributaries, and associated wetlands and riparian areas are also jeopardizing the continued survival of other categories of bird species that are designated as endangered or threatened under federal and/or state law, or are otherwise designated as species of special conservation concern, and that are reliant on the Salton Sea ecosystem for essential habitat. Such species include, but are not limited to, the Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), which is a federally-listed endangered species wherever found, and a threatened and fully-protected species under California law; the California black rail (*Laterallus jamaicensis coturniculus*), which is listed as a threatened species in California, and as a Species of Management Concern federally; and the Western snowy plover (*Charadrius nivosus nivosus*), which is a Species of Special Concern wherever it occurs in California, and the coastal population of which is listed as Threatened under federal law.
- The Desert Pupfish (*Cyprinodon macularius*), an endangered species under both federal and state law that depends on the Salton Sea ecosystem as its most important remaining stronghold, is increasingly

[28] These numbers were current as of March 2, 2026. For newer figures, see the following webpage, which summarizes data from a variety of sources and is updated periodically: https://pacinst.org/current-information-salton-sea/.

imperiled as the QSA water transfers and additional Colorado River water cutbacks cause worsening habitat loss and degradation.[29]

- Vast areas of lakebed left exposed as the Salton Sea shrinks are releasing dangerous PM_{10} and $PM_{2.5}$ particulates that contain numerous toxic and carcinogenic components including, but not limited to, heavy metals and metalloids such as arsenic, lead, chromium, nickel, cadmium, and selenium; banned pesticides such as dichlorodiphenyltrichloroethane (DDT); polychlorinated biphenyls (PCBs); and hazardous microbial components, such as microcystins from harmful algae blooms. These readily-inhalable, airborne particles being emitted from the Salton Sea's exposed lakebed are dispersed by the wind throughout the surrounding region and are already seriously harming the health of people living and working adjacent to the lake.[30] Many of the contaminants have no safe level of exposure.
- As freshwater deprivation alters water chemistry and negatively impacts the Salton Sea ecosystem, blooms of toxic algae in the lake, its tributaries, along shorelines, and in associated wetlands and riparian areas are becoming more frequent and widespread, and proliferation of other potentially harmful microorganisms is also occurring. Toxins associated with algae blooms and other hazardous microbial materials are adversely affecting fish and wildlife, and are jeopardizing the health of people via multiple exposure pathways. These dangerous substances are making their way into fugitive dust and are also becoming entrained in tiny aerosol droplets emitted from water surfaces and spread by the wind. For example, bloom-forming cyanobacterial species produce microcystins that are hepatotoxins, neurotoxins, cytotoxins, and dermatoxins, and can cause or contribute to acute liver failure, liver cancer, kidney disease, acute neurotoxicity, other neurological and neurodegenerative diseases, gastrointestinal diseases, cardiovascular disorders, respiratory and dermal disorders, and reproductive toxicity.[31] In addition, recent research indicates windblown bacterial endotoxins originating in the deteriorating Salton Sea are a probable culprit in high rates of lung inflammation and asthma occurring in communities adjacent to the lake.[32] Another recent study found that the risk of respiratory-related hospitalizations in populated areas downwind of the Salton Sea increased by about 25% for each 10-microgram-per-cubic-meter increase in coarse particulate matter (PM_{10} and $PM_{2.5}$) coming from the lake during periods when algae blooms occurred.[33]
- Hydrogen sulfide irruptions from the Salton Sea are also worsening as water quality deteriorates and the lake's ecosystem collapses. Those releases of dangerous fumes are polluting the air in adjacent populated areas and consequently are causing significant symptoms such as headaches, nausea, dizziness, and shortness of breath, and are damaging the already-impaired quality of life for

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[29] The U.S. Fish & Wildlife Service is conducting a 5-Year Status Review for the desert pupfish (87 FR 5834).

[30] Guo, F. et al. (2025). Dust Events and Children's Lung Function Near a Drying Saline Lake. *American Journal of Respiratory and Critical Care Medicine* 211(11): 2133–2136, https://doi.org/10.1164/rccm.202504-0799RL. Miao, Y., et al. (2025). Source-specific acute cardio-respiratory effects of ambient coarse particulate matter exposure in California's Salton Sea region. *Environ. Res.: Health* 3**:** 015006, https://doi.org/10.1088/2752-5309/ad934a. Biddle, T.A. et al. (2023). Aerosolized aqueous dust extracts collected near a drying lake trigger acute neutrophilic pulmonary inflammation reminiscent of microbial innate immune ligands. *Science of the Total Environment* 858(3):159882, https://doi.org/10.1016/j.scitotenv.2022.159882. Farzan, S.F. et al. (2019). Assessment of Respiratory Health Symptoms and Asthma in Children near a Drying Saline Lake. *Int. J. Env. Res. Public Health*, 16(20): 3828, https://doi.org/10.3390/ijerph16203828. Johnson, J.E. et al. (2019). The Disappearing Salton Sea: A Critical Reflection on the Emerging Environmental Threat. *Science of the Total Environment* 663: 804, https://doi.org/10.1016/j.scitotenv.2019.01.365.

[31] Lad, A., et al. (2022). As We Drink and Breathe: Adverse Health Effects of Microcystins and Other Harmful Algal Bloom Toxins in the Liver, Gut, Lungs and Beyond**.** *Life*, 12(3): 418**,** https://doi.org/10.3390/life12030418**.** Hedrick, E., et al. (2025). Microcystin: From Blooms to Brain Toxicity. *J Cell Signal* 6(1):29-38, https://doi.org/10.33696/Signaling.6.131.

[32] Yisrael-Gayle, K., et al. (2025). Evidence for Aerosolized Environmental Bacterial Endotoxin as an Environmental Health Hazard. *medRxiv* 2025.10.02.25337178, https://doi.org/10.1101/2025.10.02.25337178.

[33] Miao, Y., et al. (2025). Source-specific acute cardio-respiratory effects of ambient coarse particulate matter exposure in California's Salton Sea region. *Environ. Res.: Health* 3**:** 015006, https://doi.org/10.1088/2752-5309/ad934a.

disadvantaged people across the Salton Sea region, including Tribes. For example, a recent study found that from 2013 through 2024 the Torres Martinez Indian Reservation adjacent to the Salton Sea experienced hazardous hydrogen sulfide levels that significantly exceeded state standards for more than 250 hours every August.[34]

- The exposed Salton Sea lakebed is also emitting large quantities of biogenic greenhouse gases (including carbon dioxide, methane, and nitrous oxide), thereby threatening to undermine California's greenhouse gas (GHG) emission-reduction goals and to worsen climate change.[35] The ongoing emissions of GHGs are also associated with very high economic costs.[36]

Since the QSA was adopted in 2003, IID has complied with the many onerous requirements imposed by the terms of that agreement, and the residents of Imperial County have shouldered significant related burdens. In addition, IID and Imperial County farmers have implemented large additional reductions in the use of Colorado River water annually since 2023. In contrast, however, the State of California has violated its legal obligations related to the Salton Sea for more than two decades. Despite explicit statutory mandates and other legal requirements, the State has failed to restore the Salton Sea, has not undertaken measures necessary to appropriately mitigate the injurious effects of the QSA water transfers, and has not protected fish, wildlife, or people from entirely foreseen harm caused by decline of the Salton Sea and the deterioration of its ecosystem. In particular, the State did not prevent and has not properly mitigated the collapse of the Salton Sea fishery, has done almost nothing to conserve the fish-eating birds that have been deprived of their essential food supply,[37] and has not ensured that the harmful impacts of the QSA on endangered and threatened species dependent on the Salton Sea ecosystem are minimized and fully mitigated as required by law. Furthermore, the State has failed to avert ongoing harm to people throughout the Salton Sea region being caused by hazardous, toxic, and carcinogenic substances being emitted from the exposed lakebed and from the lake itself and other associated waterbodies as the Salton Sea shrinks, its ecosystem deteriorates, and water quality degrades.

In 2014, because of the State's ongoing failure to satisfy its legal obligations, IID initiated a proceeding at California's State Water Resources Control Board (SWRCB or Water Board) that had the potential to jeopardize the continuation of the QSA water transfers to Southern California urban areas. Ultimately, as a result of that proceeding, in 2017 the California Natural Resources Agency (CNRA) developed and agreed to expeditiously implement a "10-Year Plan" for interim mitigation of harm resulting from the QSA, by promptly constructing habitat areas and implementing dust mitigation measures on exposed lakebed. The CNRA also explicitly committed to promptly complete a long-term plan for Salton Sea restoration (which it was already required to do by the 2003 Salton Sea Restoration Act). In 2017, Water Board Order WR 2017-

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[34] Centeno, D., et al. (2025). Hypereutrophication, hydrogen sulfide, and environmental injustices: Mechanisms and knowledge gaps at the Salton Sea. *GeoHealth*, 9: e2024GH001327, https://doi.org/10.1029/2024GH001327.

[35] See the following peer-reviewed scientific report and the references cited therein: Ross, J.E. (2022). Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans. Report submitted to the California Natural Resources Agency. January 27, 2022. 14 pages. https://doi.org/10.13140/RG.2.2.36775.62884. Also see that report's Supplementary Information, explaining the possible magnitude of the greenhouse gas emissions involved: https://doi.org/10.13140/RG.2.2.10089.36964. Numerous additional studies supporting the conclusions of the foregoing report and its supplementary information have been published since that report was prepared. In particular, see the following study focused on biogenic greenhouse gas emissions from the exposed lakebed of the Great Salt Lake: Cobo, M., et al. (2024). A desiccating saline lake bed is a significant source of anthropogenic greenhouse gas emissions. *One Earth* 7(8):1414-1423, https://doi.org/10.1016/j.oneear.2024.07.001.

[36] This issue is discussed further in Part IV.F. below.

[37] Approximately 2000 acres of the State of California's "Species Conservation Habitat" (SCH), a project under development for more than a decade, finally became operational in spring 2025. It currently consists of an impoundment built on a small portion of the Salton Sea's exposed lakebed that contains Colorado River wastewater blended with a smaller quantity of Salton Sea water, and it hosts fish to provide a source of food for piscivorous birds.

0134 (the Stipulated Order) set forth the relevant requirements,[38] and incorporated those requirements as conditions of the ongoing QSA water transfers. In particular, the Stipulated Order mandated that the CNRA achieve specific annual acreage milestones for habitat creation and dust suppression on the exposed lakebed during January 1, 2018 through December 31, 2028[39] (which is actually an 11-year period, not 10 years), "in addition to currently planned and funded habitat projects (Red Hill Bay, Torres Martinez wetlands and Species Conservation Habitat)."[40] The Stipulated Order further specified, "No less than 50% of the acreage…shall provide habitat benefits for fish and wildlife that depend on the Salton Sea ecosystem. Projects that provide habitat benefits for fish and wildlife do not include dust control projects that involve surface roughening, vegetation enhancement and surface stabilization."[41] In addition, the Stipulated Order required the CNRA to "complete a long-term plan" for Salton Sea restoration "no later than December 31, 2022." The CNRA agreed to all these requirements and has been legally bound by them since 2017.

Nonetheless, the CNRA has continuously violated the requirements of the Stipulated Order since 2017. The CNRA did not "complete a long-term plan" for Salton Sea restoration by December 31, 2022; instead, in 2023 the agency's Salton Sea Management Program (SSMP) belatedly released an inadequate, deeply flawed, and scientifically unsound Draft Long-Range Plan[42] that was essentially just a rehashed presentation of suggested *options* for restoration that have been discussed but not acted upon for decades. That "plan" was not finalized until spring 2024, and its fundamental defects were not cured.[43] In addition, in every year since 2017 the CNRA has failed to comply with the mandatory acreage requirements for habitat creation and dust suppression at the Salton Sea imposed by the Water Board. For example, by the end of 2024 the CNRA was required to have created a grand total of 14,200 acres of habitat and dust mitigation measures, and at least 50% of that acreage (at least 7,100 acres) was required to be functional habitat. But, in reality, the grand total amount of habitat created by the CNRA through the end of 2024 was only 347 acres (just 4.89% of the habitat acreage required to have been created by then), and the agency had implemented "interim" and "completed" dust mitigation measures on a total of only 1302 acres (just 18.34% of the required dust suppression acreage). Although the 2026 SSMP Annual Report to the SWRCB—which will present data for habitat and dust mitigation acreage completed during 2025—has not yet been released, the SSMP's online Project Tracker indicates unofficially and provisionally that a grand total of 2,357 acres of habitat and a grand total of 2,425 acres of "interim" and "completed" dust mitigation measures were constructed from 2018 through the end of 2025.[44] This means that although the total amount of functional habitat mandated to be created by the CNRA during 2018-2028 is a minimum of 14,900 acres, currently—**eight years through the 2018-2028 period to which the Stipulated Order applies—the State has created only 15.8% of the required amount of habitat** (assuming the unofficial figures in the SSMP online Project Tracker are correct). Similarly, although the grand total amount of dust-suppression acreage mandated to be constructed by the CNRA during 2018-2028 is at least 14,900 acres, **the State has created only 16.4% of the required amount of dust mitigation**

[38] The specific requirements are set forth in Exhibit A of the Stipulated Order.

[39] Exhibit A to the Stipulated Order, pages 2-3, paragraph 24.

[40] Exhibit A to the Stipulated Order, page 2, paragraph 24. Importantly, the Red Hill Bay and Torres Martinez wetlands projects that were stated as ones "currently planned and funded," were never constructed. A portion of the Species Conservation Habitat, also specified in 2017 as "currently planned and funded" and explicitly excluded from being counted toward the acreage requirements mandated by the Stipulated Order, finally became operational in 2025.

[41] Exhibit A to the Stipulated Order, page 3, paragraph 25.

[42] My detailed public comments on the 2023 SSMP Draft Long-Range Plan are available at: https://doi.org/10.13140/RG.2.2.33676.37768.

[43] The SSMP's Final Long-Range Plan was released on March 15, 2024; a revised version was released on April 22, 2024. https://saltonsea.ca.gov/planning/ Only the Executive Summary is publicly available on the SSMP website. In order to obtain a full copy of the Final Long-Range Plan and all appendices, it is necessary to write to the CNRA and request that they be provided.

[44] See https://projects.saltonsea.ca.gov/Results/ProgressDashboard#fishAndWildlifeHabitat and https://projects.saltonsea.ca.gov/Results/ProgressDashboard#dustSuppression. The official data for calendar year 2025 will not be available until the 2026 SSMP Annual Report to the SWRCB is publicly released in spring 2026.

acreage (again assuming the unofficial online figures are correct), and only if "interim dust suppression" measures are included in the total. In addition, the Species Conservation Habitat project that the Stipulated Order stated was planned and funded as of 2017 and was therefore explicitly excluded from being counted toward fulfillment of the Order's acreage requirements, is nonetheless being counted by the State toward fulfillment of the acreage requirements and represents all of the habitat acreage created by the SSMP so far. Moreover, the SSMP's Red Hill Bay and Torres Martinez wetlands habitat projects that the Stipulated Order also stated were planned and funded as of 2017 were never constructed.

As discussed further in Part VI.B.1. below, it is not clear whether the remainder of the 10-Year Plan's projects will actually be built, and—even assuming they are constructed—it is also unclear whether they will operate as intended, in a safe and effective manner, and whether they will be sustainable.

Beginning in 2023, the U.S. Army Corps of Engineers (the USACE or the Corps) took over from the State the task of evaluating potential restoration approaches to achieve long-term revitalization or restoration of the Salton Sea ecosystem. For that purpose, as further discussed in Part VI.B.2. below, the USACE is currently conducting a multi-year feasibility study of partial revitalization and full restoration options, entitled the Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study (ISSS Study). Unfortunately, however, the Corps has "adopted" and is "relying on"[45] the SSMP's inadequate and seriously defective Long-Range Plan, as well as the biased, scientifically unsound, and fatally flawed findings of the U.C. Santa Cruz panel[46] that was previously hired by the State of California to conduct a full feasibility study of ocean water importation options to restore the Salton Sea but that failed to perform the necessary work.[47] In addition, the USACE study is not fully funded, and the Corps appears to be fundamentally hampered in its ability to properly conduct the study because of major jurisdictional limitations. As the Salton Sea Authority—a non-federal co-sponsor of the ISSS Study—explained in its February 27, 2026 comments to Reclamation on the DEIS, those jurisdictional constraints include, but are not limited to, the following: "Corps policy does not permit the Corps to undertake projects on federal lands, nor does policy permit the Corps to count [in the benefit-cost analysis required to be conducted as part of the ISSS Study] the benefits of the [alternative actions evaluated in the] Feasibility Study provided to federal lands. Moreover, the Corps is also limited in its ability fully value the public health benefits of this work."[48] In addition, the Corps has publicly acknowledged that addressing water quality problems is not within the scope of the USACE's authority, and the ISSS Study will not specifically address those problems.[49] It is therefore unclear what sort of revitalization or restoration project the USACE study may ultimately recommend, and it also remains unclear whether that project will be approved and funded by Congress, whether it will be built, and whether it will actually be effective in addressing any of the harmful Salton Sea Impacts that are currently ongoing and that will worsen significantly in the future if Reclamation's Proposed Action is implemented.

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[45] Statements by Corrie Stetzel, USACE Water Resources Planner, during the November 20, 2025 Salton Sea Authority Board Meeting, agenda item IV.C. A video of the Board meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. Ms. Stetzel's presentation and comments begin at 25:50 in the video.

[46] In the video for which a link is provided supra in footnote 45, Ms. Stetzel refers to the U.C. Santa Cruz panel as "the independent review panel." Video of November 20, 2025 Salton Sea Authority Board Meeting, at 49:15 to 50:07.

[47] The serious problems affecting the State's Long-Range Plan and the U.C. Santa Cruz panel's contract, process, findings, and conclusions are analyzed in detail in my public comments on the Draft SSMP Long-Range Plan (available at https://doi.org/10.13140/RG.2.2.33676.37768) and my public comments on the work of the U.C. Santa Cruz panel (available at https://doi.org/10.13140/RG.2.2.30320.93448) that were submitted to both the State and the Corps in 2023.

[48] Salton Sea Authority (February 27, 2026). Public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, page 8. Available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf.

[49] Corrie Stetzel, USACE Water Resources Planner for the ISSS Study, stated during the November 20, 2025 Salton Sea Authority Board Meeting, "…we don't normally work in water quality; that falls under the authority of the Environmental Protection Agency… it's not part of our, directly part of our Army Corps of Engineers mission, unfortunately. So, we won't be formulating for that parameter specifically." A video of the Board meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. The quoted comments are at 48:21 to 49:14 in the video.

While the CNRA continues its chronic failure to comply with crucial legal mandates, and the USACE proceeds with a feasibility study that is incompletely funded, handicapped by jurisdictional constraints, and relies on the SSMP's inadequate and scientifically unsound Long-Range Plan and the U.C. Santa Cruz panel's biased and fatally flawed findings, the harmful impacts of the Salton Sea's freshwater deprivation are worsening and will continue to do so. The Salton Sea is shrinking ever more rapidly as IID's use of Colorado River water continues to decrease pursuant to the QSA and because of the District's further water conservation measures instigated and approved by Interior and Reclamation; the lake's salinity is rising at an accelerating pace, and is already more than twice the salinity of the ocean; increasingly large areas of exposed lakebed are emitting hazardous, toxic, and carcinogenic substances and greenhouse gases; the water quality in the lake, its tributaries, and associated wetlands is rapidly deteriorating; the survival of fish and wildlife dependent on the Salton Sea ecosystem, including endangered and threatened species, is increasingly in jeopardy; and people across the surrounding region are being subjected to grave harm that is potentially irreversible. And now, because of the Colorado River's genuine crisis, the Proposed Action will foreseeably deprive the Salton Sea ecosystem of even more water, and will substantially exacerbate the harm to fish and wildlife, the environment, the climate, Tribes, and other disadvantaged communities throughout the Salton Sea region that is already ongoing.

III. Reclamation is legally obligated to analyze the Salton Sea Impacts of the Proposed Action, and to commit to avoiding or minimizing and fully mitigating them, but has unjustifiably failed to do so in the DEIS

Any action alternative for managing the Colorado River in the Post-2026 Program that reduces water use by Salton Trough rights holders will necessarily exacerbate significantly the injurious impacts of freshwater deprivation that are already affecting the Salton Sea and its ecosystem, the remaining fish including an endangered species, hundreds of bird species including ones that are listed as endangered or threatened, the regional environment, the climate, and the health and socioeconomic well-being of more than half a million people throughout the surrounding area. In compliance with the National Environmental Policy Act (NEPA),[50] the NEPA implementing regulations,[51] associated case law, and other applicable law, Interior and Reclamation are legally obligated to fully analyze these issues in the EIS for the Proposed Action, and to identify and commit to implementing measures that will avoid, or minimize and fully mitigate to the greatest feasible extent, the cumulative and significant Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action. Nonetheless, the DEIS unjustifiably fails to address these issues. In addition, the Proposed Action must comply with other applicable laws, including but not limited to the requirements of the Clean Air Act,[52] the Endangered Species Act,[53] and the Migratory Bird Treaty Act,[54] as well as associated rules, regulations, and case law. [55]

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[50] Pub. L. 91–190, 42 U.S.C. 4321 et seq.

[51] National Environmental Policy Act Implementing Regulations (May 20, 2022). 40 CFR Parts 1500-1508.

[52] 42 U.S.C. §§ 7401–7671q.

[53] 16 U.S.C. §§ 1531–1544.

[54] 16 U.S.C. §§ 703-712.

[55] Furthermore, Interior is also legally obligated to comply with all relevant laws that are applicable to the very large portions of land adjacent to and beneath the Salton Sea that are owned and/or managed by Interior and agencies within that Department, including Reclamation, the Bureau of Land Management, and the U.S. Fish & Wildlife Service. (See https://www.usbr.gov/lc/region/programs/SaltonSeaProjectsMap.pdf.) As Interior and Reclamation know, foreseeably the Proposed Action will have harmful consequences that will cause those lands to violate applicable laws, including but not limited to the Clean Air Act and its implementing rules and regulations. For example, see the Addendum to the August 31, 2016 Memorandum of Understanding By and Between the U.S. Department of the Interior and the State of California Natural Resources Agency Regarding the Coordination of Activities to Manage the Salton Sea (signed by Interior Jan. 17, 2017), which provided, "…Parties will comply with all applicable requirements of the Federal Clean Air Act and all implementing rules and regulations in connection with potential air quality emissions from Salton Sea

The NEPA implementing regulations define 'cumulative impacts' of a proposed federal action as:

> "…the impact on the environment 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.** Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."[56]

Reclamation acknowledged the nature of cumulative impacts in the 2024 Final SEIS for Near-Term Colorado River Operations:

> …cumulative impacts refer to two or more individual impacts that, when considered together, are significant or that compound or increase other environmental impacts. Cumulative impacts can be categorized as additive and interactive. An additive impact results from additions from one kind of source through either time or space. An interactive impact results from more than one kind of source.[57]

In addition to evaluating whether the harmful effects of the Proposed Action are cumulative, Reclamation was required by law to analyze whether the negative effects will be significant. The NEPA implementing regulations state:

> "**In considering whether an adverse effect of the proposed action is significant, agencies shall examine both the *context* of the action and the *intensity* of the effect.**"[58]

For the analysis of "context," agencies are directed to consider "the characteristics of the geographic area, such as **proximity to unique or sensitive resources or communities with environmental justice concerns**,"[59] and also "**the potential global, national, regional, and local contexts** as well as **the duration, including short-and long-term effects**."[60]

For the analysis of "intensity," the NEPA implementing regulations state in part:[61]

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playa lands owned or managed by the Parties that are exposed as a result of decline in elevation of the Salton Sea." https://www.doi.gov/sites/doi.gov/files/uploads/signed_addendum_connor_salton_sea.pdf. Interior and Reclamation also know that very costly mitigation measures will be required to be implemented on the lands they own and manage in order to mitigate the harmful air quality impacts of reduced inflows to the Salton Sea. For example, Reclamation explicitly acknowledged the need for mitigation and the high costs involved in the agency's FY 2021 Official Budget Justifications. That document states: "Reclamation estimates that approximately 8.75 square miles of Reclamation-owned lands will be emergent from the Sea as it recedes over the next 10 years. Even using extremely conservative estimates related to the costs at Owens Lake, Reclamation may still have significant air quality mitigation costs related to any applicable Clean Air Act requirements as the Sea recedes." (Pages 41-42.) In the same document (at page 41), Reclamation specifies the costs at Owens Lake for mitigating particulate pollution as: "…air quality mitigation establishment costs at approximately $38 million per square mile (averaged over all types of mitigation) and annual maintenance costs of approximately $500,000 per square mile." Applying those numbers to the 8.75 square miles of Reclamation-owned lands at the Salton Sea yields a minimum cost of $332.5 million for establishing air quality mitigation measures, and an annual operations and maintenance cost of at least $4.375 million.

[56] 40 CFR 1508.7, emphasis added.

[57] Final SEIS for Near-Term Colorado River Operations, page 3-10.

[58] 40 CFR 1501.3(d), bold emphasis and italics added.

[59] 40 CFR 1501.3(d)(1), emphasis added.

[60] Ibid., emphasis added.

[61] 40 CFR 1501.3(d)(2), emphasis added.

> …**Agencies shall analyze the intensity of effects considering the following factors,** as applicable to the proposed action and in relationship to one another**:**
>
> (i) The degree to which the action **may adversely affect public health and safety**.
> (ii) The degree to which the action **may adversely affect** unique characteristics of the geographic area such as…**ecologically critical areas**.
> (iii) Whether the action **may violate relevant Federal, State, Tribal, or local laws** or other requirements **or be inconsistent with Federal, State, Tribal, or local policies designed for the protection of the environment**.
> …….
> (vi) The degree to which the action **may adversely affect an endangered or threatened species or its habitat**, including habitat that has been determined to be critical under the Endangered Species Act of 1973.
> (vii) The degree to which the action **may adversely affect communities with environmental justice concerns**.
> (viii) The degree to which the action **may adversely affect rights of Tribal Nations** that have been reserved through treaties, statutes, or Executive Orders.

In evaluating the significance of the reasonably foreseeable adverse impacts of the Proposed Action, Reclamation was required in part to consider various key aspects of the context in which the Proposed Action will occur. Critical to the Proposed Action's context is the comprehensive, two-decade-long failure by the State of California to comply with legal mandates to restore the Salton Sea and to avoid or minimize and fully mitigate the harmful effects of the QSA water transfers on fish, wildlife, the environment, and people. This ongoing violation of legal requirements has had and continues to have significant and harmful Salton Sea Impacts. Moreover, the extent of those impacts was not anticipated in the EIR/EIS for the QSA because no one expected that the State of California would violate its legal obligations throughout the past two decades.[62] Reclamation should have considered that crucial context in the DEIS, but did not.

Concerning the "intensity" of effects foreseeably resulting from Reclamation's Proposed Action, there is no reasonable doubt that it will cause a variety of significant cumulative impacts that include ones explicitly enumerated in the NEPA implementing regulations as factors affecting the intensity of an agency's contemplated action, as quoted above. It is also clear that the consequences of the Proposed Action will interact with and compound the environmental, ecological, and human-health impacts of the QSA water transfers and the additional recent cutbacks in Colorado River water use by IID during 2023-2026 that were approved by Reclamation, including the unmitigated adverse impacts resulting from the State of California's failure to comply with its legal obligations relating to the Salton Sea for more than twenty years.

The Proposed Action will foreseeably result in large additional reductions in Colorado River water use by IID, beyond the cutbacks already occurring because of the QSA and the 2023 and 2024-2026 SCIAs, and those additional reductions may be ongoing over the course of many years. It is clear such additional reductions in IID's Colorado River water use will significantly reduce Salton Sea inflow and greatly worsen the dreadful consequences for people, fish and wildlife, the regional environment, and the climate that are already occurring as a result of the Salton Sea's ongoing freshwater deprivation, and that have been inadequately addressed for many years by the responsible government agencies.[63]

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[62] In light of the State of California's egregious and ongoing violation of its legal obligations for more than twenty years, and considering the significant harm that has been occurring as a result of that unexpected and chronic violation of law, arguably a Supplemental EIS process concerning the QSA water transfers should have been initiated previously pursuant to 40 CFR Part 1502.9(d)(1)(ii).

[63] The Proposed Action will also cause foreseeable and significant adverse impacts on recreation, cultural resources including Tribal cultural resources, visual resources, paleontological resources, and socioeconomics throughout the Salton Sea region. See my public comments on the 2024 Draft SEIS for Near-Term Colorado River Operations: https://www.usbr.gov/ColoradoRiverBasin/documents/NearTermColoradoRiverOperations/PublicComments/Organizations/557_Stout%20Research%20Center_508.pdf

Despite the fact that the Proposed Action will foreseeably have cumulative and significant harmful consequences throughout the Salton Sea region, including but not limited to ones that are likely to violate the Clean Air Act, the Endangered Species Act, and the Migratory Bird Treaty Act, and associated rules, regulations, and case law, the DEIS completely fails to address the relevant issues.[64] Instead, Reclamation states, "While any resultant impacts on the Salton Sea may be accelerated by Post-2026 policies, the overall magnitude of impacts would not change."[65] Essentially, Reclamation is claiming that harmful Salton Sea Impacts resulting from the Proposed Action will not be cumulative or significant as those concepts are defined under applicable law, because the QSA water transfers will cause the same effects decades from now. This claim is unjustified, unreasonable, and legally untenable.

By alleging that the Proposed Action will not result in additional or cumulative harm beyond the consequences that the QSA will cause, Reclamation is essentially saying that the ongoing QSA water transfers will eventually destroy the Salton Sea, expose most of its lakebed, and cause devastating and irreversible harm to fish, wildlife, and people anyhow, so overall it doesn't matter that the Proposed Action will substantially expedite the demise of the Salton Sea and its ecosystem; significantly increase the amount of exposed lakebed emitting large quantities of hazardous, toxic, and carcinogenic particulates, including substances for which there is no safe level of exposure; cause dreadful impacts on people, including additional debilitating disease and even death; imperil the continued survival of endangered and threatened species, and hundreds of other species dependent on the Salton Sea ecosystem; and continue to cause all of this harm for many years.[66] That is an insupportable claim, both legally and morally. If Mr. X were to strangle Mr. Y to death and then declare that his action caused no additional harm to Mr. Y because Mr. Y would have died eventually anyhow (as we all will), that assertion would obviously be ludicrous and legally indefensible. Reclamation's claim in the DEIS is no less ludicrous and indefensible.

The Proposed Action is likely to reduce Salton Sea inflows by a minimum of hundreds of thousands of acre-feet annually, and potentially far more, in addition to the very large amount by which inflows are already reduced because of the QSA water transfers. Those additional reductions will rapidly expose vast areas of lakebed. For example, modeling for the Final SEIS for Near-Term Colorado River Management determined that reductions in use of Colorado River water by Salton Trough rights holders during 2024-2026 would cause the exposure of up to 35,594 acres of lakebed through 2026.[67] Furthermore, that modeled amount of exposed lakebed did not account for the effects of 10-Year Plan projects, including the Species Conservation Habitat project, or for consumption of water by emergent vegetation and actively planted vegetation on the exposed lakebed; if the modeling had done so, the amount of exposed lakebed resulting from reduced inflow into the Salton Sea would have been larger. Even if annual decreases in Salton Sea inflows pursuant to the current Proposed Action are comparable to and not more voluminous than the ones occurring during 2024-2026 pursuant to the Final SEIS for Near-Term Colorado River Management, the additional inflow reductions beginning in 2027 will cause much more expansive areas of lakebed to be exposed because they will very likely be sustained across a longer period of time. Moreover, the amount of lakebed to be exposed will be

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[64] Reclamation could not have been genuinely unaware of the fact that the reductions in use of Colorado River water by Salton Trough water users that will foreseeably be necessitated by the Proposed Action will result in significant harmful impacts (consistent with the definition of "significance" under applicable law, including but not limited to 40 CFR Part 1501.3(d)) on the Salton Sea and its ecosystem, fish and wildlife reliant on that ecosystem, the regional environment, the climate, and the health, safety, and socioeconomic well-being of people throughout the surrounding area. At a bare minimum, my detailed scoping coming for the Post-2026 Program in August 2023, as well as my public comments on Reclamation's Revised Draft SEIS for Near-Term Colorado River Operations in December 2023, provided clear notice to the agency that additional cutbacks in IID's use of Colorado River water would indeed cause significant adverse impacts of those types, and would require an appropriate analysis in any related EIS. Public comments by others also provided such notice to Reclamation.

[65] DEIS, Chapter 3, section 3.2.7, page 3-24.

[66] Although the period during which the Proposed Action will be in effect is not yet known, presumably the time-frame will be at least 5 years and potentially much longer.

[67] Final SEIS for Near-Term Colorado River Management, page 3-146.

even greater because of water consumption by additional components of the 10-Year Plan and other factors. Thus, it is foreseeable that very large additional expanses of lakebed—far beyond the area projected to be exposed because of the QSA—will become exposed annually as a result of the Proposed Action, and that exposure will be ongoing over the course of many years, and even for decades. In fact, as a result of the Proposed Action the Salton Sea is likely to be reduced to a relatively small and extraordinarily hypersaline brine sink that cannot support any living thing other than halophilic bacteria, viruses, and other microorganisms, many of which will post serious risks of harm to wildlife and people.

It is foreseeable that the additional areas of lakebed to be exposed as a result of the Proposed Action will emit dangerous particulates containing hazardous, toxic, and carcinogenic constituents into the region's air, and the readily-inhalable pollutants will have significant harmful effects on public health in the adjacent populated areas, including injurious impacts on Tribes and other environmental justice communities, that will compound the detrimental effects of the twenty-year failure by government officials to remedy the consequences of the QSA. Many of the dangerous substances involved have no safe level of exposure. Thus, it is foreseeable that the Proposed Action will cause people throughout the Salton Sea region to suffer substantially worsened morbidity and mortality for many years. That dire and irreversible harm is not rendered inconsequential because the QSA water transfers conceivably *might* ultimately cause the same impacts decades from now.

The Proposed Action will also reduce the quantities of water in Salton Sea tributaries and associated wetlands and riparian areas, substantially increase the lake's salinity and have other adverse impacts on water quality, and will thereby jeopardize the survival of fish and wildlife dependent on the Salton Sea ecosystem. It is foreseeable that many fish and birds—including ones that are already endangered and threatened, as well as other Special Status Species—will be killed, and even completely extirpated or pushed entirely to extinction, as a result of the substantial, ongoing reductions in freshwater inflows that will foreseeably occur pursuant to the Proposed Action. That major and irreversible harm is not rendered inconsequential because the QSA water transfers conceivably *might* someday cause the Salton Sea ecosystem to collapse fully and all the fish and wildlife reliant on it to disappear eventually.

The assertion by Reclamation in the DEIS that the harm to be caused by the Proposed Action is not cumulative or significant because it will happen eventually anyhow due to the QSA is specious for another reason as well: The allegedly inevitable long-term harm will not actually occur if government officials comply with their legal obligations to restore the Salton Sea. As noted earlier, to combat the impacts of the QSA, restoration of the Salton Sea was legally required by statute in 2003 at the time the QSA was finalized. That legislation was specifically intended to prevent significant future harm to fish, wildlife, and people resulting from the QSA water transfers. The Salton Sea Restoration Act[68] mandates action to restore the habitats necessary for permanently supporting the numbers and variety of fish, birds, and other wildlife originally reliant on the Salton Sea ecosystem, and to protect people from various types of injurious consequences that will result if the lake continues to shrivel from freshwater deprivation, more of its lakebed is exposed, and its ecosystem collapses. If government officials fully satisfy their legal responsibilities, serious future harm to fish, wildlife, and people that would otherwise ultimately occur in the coming decades because of the QSA will not materialize.

The Proposed Action will cause cumulative and significant harm to fish, wildlife, and people long before full long-term restoration of the Salton Sea can feasibly be implemented, and also before the State completes and operates the interim projects in the 10-Year Plan necessary to satisfy its shirked legal obligations to properly mitigate harm resulting from the QSA water transfers. Moreover, some of the harmful consequences of the Proposed Action will be irreversible even if comprehensive restoration of the Salton Sea ultimately occurs in the future. Many foreseeable negative effects of the Proposed Action—including major emissions of

[68] California Fish and Game Code Chapter 13, Sections 2930 et seq. The Salton Sea Restoration Act was originally passed in 2003 as part of a package of legislation related to the 2003 QSA. It was strengthened in 2013 by passage of amendments that provided greater detail regarding the intent of the California Legislature in mandating Salton Sea restoration, clarified the State's specific restoration obligations, and required that the CNRA Secretary lead restoration efforts in coordination with the Salton Sea Authority.

hazardous particulates and greenhouse gases from exposed lakebed, die-offs of fish and birds, and human morbidity and mortality—constitute irremediable harm that cannot be retroactively cured by subsequent restoration actions. It is unreasonable and contrary to applicable law for Reclamation to assert, in essence, that none of this harm matters.

When previously proposing other recent agency actions that would also reduce inflows to the Salton Sea and would also foreseeably cause significant additional harm beyond the impacts of the QSA. Reclamation has repeatedly made essentially the same insupportable assertion that the agency has now made in the DEIS, i.e., that Salton Sea Impacts will not be cumulative or significant because the QSA will cause the same effects eventually. That unjustifiable assertion was made by Reclamation in the following documents: the Revised Draft Supplemental Environmental Impact Statement for Near-Term Colorado River Operations,[69] the Final Supplemental Environmental Impact Statement for Near-Term Colorado River Operations,[70] the Draft Environmental Assessment for the IID 2024-2026 Temporary Colorado River System Water Conservation Project,[71] and the Final Environmental Assessment for the IID 2024-2026 Temporary Colorado River System Water Conservation Project.[72] Despite public comments, including my own, pointing out that in fact the harm to be caused by the actions proposed in those documents would indeed be cumulative and significant, the agency nonetheless failed to respond appropriately to those comments and proceeded with the proposed actions. Those actions have greatly reduced inflows to the Salton Sea beyond the reductions resulting from the QSA, and have caused additional and significant harm. Now Reclamation makes the same indefensible claim again in support of another Proposed Action that will cause even worse harm to the Salton Sea and its ecosystem, fish and wildlife dependent on that ecosystem, the regional environment and the climate, and more than half a million people throughout the surrounding region. This is death by a thousand cuts, and Reclamation is wielding the knife.

The federal government has a responsibility "…to use all practicable means, consistent with other essential considerations of national policy, to… attain the widest range of beneficial uses of the environment **without degradation, risk to health or safety, or other undesirable and unintended consequences**…"[73] Similarly, the NEPA implementing regulations state, "**Federal agencies shall to the fullest extent possible… Use all practicable means**, consistent with the requirements of the Act and other essential considerations of national policy, **to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.**"[74] For Reclamation to proceed with the Proposed Action as currently formulated would be to violate these most fundamental federal responsibilities.

The DEIS presents inadequate, incorrect, and legally insupportable assertions and fails to properly analyze: (a) the significant direct, indirect, cumulative, and disproportionate negative impacts on the Salton Sea, the fish and wildlife reliant on the Salton Sea ecosystem, the environment, the climate, and people throughout the areas adjacent to the lake—including, but not limited to, Tribes and other environmental justice communities—that foreseeably will result if Reclamation proceeds with the Proposed Action; (b) alternatives for avoiding the foregoing adverse impacts; and (c) effective mechanisms for minimizing and fully mitigating the harmful effects that cannot be avoided. Reclamation's failure in the DEIS to properly evaluate the Proposed Action's harmful Salton Sea Impacts clearly violates the agency's legal obligations and must be fully remedied in a revised DEIS.

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[69] https://www.federalregister.gov/d/2023-23759/p-9.

[70] https://www.usbr.gov/ColoradoRiverBasin/documents/NearTermColoradoRiverOperations/20240300-Near-termColoradoRiverOperations-FinalSEIS-508.pdf

[71] https://www.usbr.gov/lc/region/g2000/envdocs.html.

[72] Ibid.

[73] NEPA, Section 101(b), emphasis added.

[74] 40 CFR Part 1500.2, emphasis added.

IV. Statements by Reclamation in the DEIS related to Salton Sea issues and Salton Sea Impacts are factually incorrect, misleading, and legally insupportable; and the agency's omissions violate applicable law

IV.A. Statements in the DEIS related to Salton Sea inflows are incorrect and misleading

In the DEIS Reclamation claims that, "Over the past 20 years, inflows to the Salton Sea have declined from 1.3 MAF per year to approximately 1.1 MAF per year."[75] This statement is incorrect and misleading; in reality, inflows have declined significantly more than Reclamation acknowledges, and will very likely continue to do so. Although total inflows to the Salton Sea were 1.094 MAF in 2021, they were 1.065 MAF in 2022, 0.987 MAF in 2023, 0.909 MAF in 2024,[76] and 0.890 MAF in 2025.[77] Inflows to the Salton Sea will very likely decline further in 2026 as a result of ongoing water conservation measures instigated and approved by Reclamation and the unusually high temperatures occurring this year in the Salton Trough, as well as because of the potential need for Reclamation to implement emergency reductions in Colorado River water allocations in the event that reservoir levels drop to critically low elevations due to the very dry conditions that are adversely affecting Colorado River streamflow. If the Proposed Action is implemented beginning in 2027, inflows will foreseeably plummet even further.

Reclamation also states in the DEIS that the lowest inflows to the Salton Sea that will occur pursuant to the Proposed Action would be 783,000 af; and claims further that, "Any resultant impacts [of the Proposed Action] are within the scope and range of inflows being considered in the SSMP's long-range plan and the USACE's ongoing NEPA process."[78] These statements are false and misleading. Catastrophically low allocations of water to Lower Basin states will foreseeably occur in the future as a result of worsening hydrology in the Colorado River Basin, and may even occur by the end of 2026. Based on the current dry conditions in the Upper Basin, in combination with the already-low elevations of reservoirs, Reclamation has projected that the elevation of Lake Powell may drop below minimum power pool by December 2026.[79] As Reclamation certainly knows, that scenario would necessitate radical reductions in the provision of Colorado River water to Lower Basin rights holders, including Salton Trough rights holders. If that situation occurs, inflows to the Salton Sea will plummet by an extreme amount. The water arriving in the lake would be a tiny fraction of 783,000 af, and far lower than the lowest inflow anticipated in the State's Long-Range Plan. Since the USACE is relying on the State's Long-Range Plan for its NEPA analysis,[80] the foreseeable inflows to the Salton Sea in the foregoing dire scenario would also be far lower than the inflows the Corps is considering.

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[75] DEIS, Chapter 3, Section 3.2.7, page 3-23.

[76] Figures for inflow each year during 2021-2024 are presented in the 2025 SSMP Annual Report, p.69. That report is available online at: https://saltonsea.ca.gov/wp-content/uploads/2025/03/2025-Annual-Report_508_WCAG.pdf.

[77] Pers. Com. S. Roy and K. Heidel at Tetra Tech, Inc., February 24, 2026. Tetra Tech is the contractor for the State of California that is assisting the State with preparation of the SSMP 2026 Annual Report, which has not yet been released.

[78] DEIS, Chapter 3, Section 3.2.7, page 3-24. It is unclear how the figure of 783,000 af was derived; it appears incorrect.

[79] U.S. Bureau of Reclamation, 24-Month Study Projections, Lower Colorado River Operations, Feb. 14, 2026. Available online at: https://www.usbr.gov/lc/region/g4000/riverops/24ms-projections.html.

[80] Statements by Corrie Stetzel, USACE Water Resources Planner, and Patrick O'Dowd, Executive Director/General Manager of the Salton Sea Authority, during the Salton Sea Authority Board Meeting on November 20, 2025, agenda item IV.C. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/.

IV.B. Statements in the DEIS related to Reclamation's authority appear to be inaccurate

In the DEIS, Reclamation also indicates that it does not have the authority to address Salton Sea Impacts because, "Reclamation does not control the end use and management of delivered or conserved water. As such, Reclamation has no management authority over inputs to the Salton Sea, and Reclamation has no enforcement authorities over the Salton Sea." This assertion appears to be inaccurate.

I am aware of at least one significant instance in which Reclamation did "control the end use and management of delivered or conserved water" and did exert "management authority over inputs to the Salton Sea." In 2010 IID announced that it would be making early deliveries into the Salton Sea of QSA mitigation flows destined for the lake in 2011 and 2012 pursuant to the District's QSA-related obligations, using part of IID's Colorado River water entitlement. The Metropolitan Water District (MWD) vehemently opposed the proposal, and argued that such deliveries would violate the Law of the River. IID maintained such early deliveries were necessary because of legal uncertainty at that time concerning the future of its QSA fallowing program, which was conserving the water used for mitigation inflows. The QSA had just been invalidated by the California Superior Court handling litigation regarding that complex series of agreements, and appeal of that court's ruling was pending. IID wanted to be sure that its legal obligations to provide mitigation flows into the Salton Sea would be met during pendency of the appeal, regardless of uncertainty about the future of the fallowing program. But MWD was immovable in objecting, and was not alone in challenging the early deliveries of mitigation water; other water agencies in other Colorado River Basin states expressed similar concerns that the suggested action would contravene the Law of the River. Most importantly, Reclamation told IID that sending Colorado River water directly into the Salton Sea was improper, notwithstanding the uncertainties involved in the QSA litigation.[81] Ultimately, because the early deliveries of mitigation water were in fact sent into the Salton Sea by IID, Reclamation later required the District to "repay" those amounts of Colorado River water to USBR.[82]

IV.C. Reclamation's reliance on the SSMP 10-Year Plan and USACE feasibility study to address Salton Sea Impacts of the Proposed Action is misguided

Reclamation relies on the activities of the SSMP and the USACE to avoid or mitigate any Salton Sea Impacts that may occur because of the Proposed Action, but that reliance is inappropriate and relies on incorrect and misguided assumptions. The DEIS states:

> The California Natural Resources Agency established the Salton Sea Management Program (SSMP) to oversee restoration efforts at the Salton Sea. Currently, the SSMP is working with local, state, tribal, and federal partners to implement the first phase of habitat restoration projects to establish at least 14,900 acres of aquatic habitat and up to 14,900 acres of vegetated habitat by the year 2028 (USACE 2024). Additionally, the SSMP released a long-range plan to address future recession of the Salton Sea beyond the year 2028 (California Natural Resources Agency 2024). The goal of the plan is to protect or improve air quality, water quality, and wildlife habitat to prevent or reduce health and environmental consequences anticipated from the long-term recession of the Salton Sea shoreline (California Natural Resources Agency 2024) … The SSMP's long-range plan is informing the scope of the Imperial Streams and Salton Sea Ecosystem Restoration Feasibility Study and NEPA compliance that the USACE is currently preparing. Once that process is complete, state and federal funding will be pursued to support the resultant design and construction of restoration projects, beginning around 2028.[83]

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[81] Some of the background details and correspondence among the parties related to these issues are in the following document: https://www.iid.com/home/showpublisheddocument/4698/635648001335730000

[82] The details of this "repayment" are complicated and beyond the scope of these comments.

[83] DEIS, Chapter 3, Section 3.2.7, page 3-23.

The 10-Year Plan is not fully funded, and—contrary to the claims of Reclamation—the SSMP is so far behind in performing the necessary work, as explained in Part II above, that there is no reasonable hope the remaining work to implement the 10-Year Plan will actually be completed by 2028. In addition, as also explained above, the State's Long-Range Plan is not itself an action plan for restoration that is actually being implemented; rather, it is a presentation of options for partial revitalization and full restoration that contains serious and fundamental deficiencies and defects that render its analysis scientifically unsound.[84] Furthermore, the multi-year USACE Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study (the ISSS Study) that Reclamation references is also not fully funded, it is only in a formative stage, and it is hampered by major jurisdictional constraints and self-imposed subject-matter limitations, as described in Part II above. It is not expected to be completed by 2028, and any project it proposes will not be congressionally approved and funded (assuming that ultimately it is, in fact, approved and funded) until the end of 2030 or potentially even later. As explained in further detail in Part VI.B. below, the SSMP's 10-Year Plan, the SSMP's Long-Range Plan, and the activities of the Corps related to the ISSS Study do not even come close—either temporally or substantively—to being capable of avoiding, or minimizing and fully mitigating, the rapid and extremely harmful Salton Sea Impacts that the Proposed Action will foreseeably cause beginning in 2027.

IV.D. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on air quality and public health in the Salton Sea region

The Proposed Action will foreseeably cause elevated quantities of hazardous, toxic, and carcinogenic contaminants and noxious fumes to pollute the air across the Salton Sea region, causing injurious and even potentially lethal impacts on people. Reclamation completely failed to analyze these issues and must do so appropriately and fully in a revised DEIS.

Dust emissions resulting from the Proposed Action will foreseeably pollute inhabited areas with substances identified and regulated under federal and state law as hazardous, toxic, and carcinogenic. The inhalable pollutants will pose significant additional health threats to people in communities adjacent to the Salton Sea, including members of federally recognized Tribes, compounding the harm already being caused by the exposure of lakebed as a result of the ongoing QSA water transfers and additional water cutbacks instigated and approved by Reclamation during 2023-2026.

As defined by the U.S. Environmental Protection Agency, "Hazardous air pollutants, also known as toxic air pollutants or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects."[85] 188 substances qualifying as HAPs are listed pursuant to section 7412 of Title 42 of the U.S. Code and regulated by the U.S. Environmental Protection Agency.[86] In addition, Section 39655 of the California Health and Safety Code states that a toxic air contaminant (TAC) is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." The California Air Resources Board has formally identified 200 substances that qualify as TACs, including but not limited to all federally-identified HAPs.[87]

Numerous contaminants that are present in Salton Sea sediments and that are very likely to be constituents of the dust emitted from the exposed lakebed into the air breathed by people throughout the surrounding region are listed and regulated as hazardous air pollutants (HAPs) under federal law and as toxic air contaminants

[84] See Part II above, and the links in footnote 47 for my detailed comments on the 2023 SSMP Draft Long-Range Plan and on the fatally flawed work of the U.C. Santa Cruz panel that was incorporated into the Long-Range Plan.

[85] https://www.epa.gov/haps/about-hazardous-air-pollutants.

[86] The current HAP list is available at: https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications.

[87] Substances listed as federal hazardous air pollutants (HAPs) are TACs under California law pursuant to Section 39657(b) of the California Health and Safety Code.

(TACs) under California law. Those harmful contaminants in lakebed sediments include, but are not limited to, heavy metals and metalloids such as arsenic, lead, chromium, nickel, cadmium, and selenium; polychlorinated biphenyls (PCBs); and residues of numerous legacy pesticides, such as DDT, that have been banned or severely restricted but previously accumulated in the Salton Sea's lakebed while they were in use in the U.S. and/or in Mexico.[88]

The harmful health effects of acute and chronic inhalation of the tiny airborne particulates known as PM_{10} and $PM_{2.5}$ are well established scientifically, and include but are not limited to respiratory symptoms, asthma attacks, acute and chronic bronchitis, worsening of chronic obstructive pulmonary disease (COPD), restricted activity days, increased emergency room visits and hospitalizations for pulmonary and cardiac causes, and premature mortality. Moreover, PM_{10} and $PM_{2.5}$ emitted from the exposed Salton Sea lakebed pose even greater risks of harm because they contain a variety of toxic and carcinogenic components designated as HAPs and TACs, as well as other dangerous substances such as microcystins from toxic algae blooms and *Coccidioides* fungal spores that cause serious and potentially lethal diseases. Dust emitted from the Salton Sea lakebed is "uniquely toxic," and far more hazardous than typical desert dust.[89] People in communities near the Salton Sea are already suffering significant and disproportionate pulmonary illness associated with chronic inhalation of dangerous particulates being emitted from exposed Salton Sea lakebed because of the QSA water transfers and other recent water cutbacks that have lowered the Salton Sea's elevation and exposed vast expanses of lakebed. For example, a recent study found that the childhood asthma rate for the portion of Imperial County closest to the Salton Sea's exposed lakebed was 22.4% in comparison to a nationwide prevalence of 8.4%.[90] The same study determined that chronic pulmonary symptoms in children not diagnosed with asthma are also unusually high in the Salton Sea region. Notably, emergency room visits for children ages 5-17 years with asthma in Imperial County are more than double the California statewide average.[91]

Because the Proposed Action will foreseeably and significantly increase the exposure and desiccation of Salton Sea lakebed and cause large additional emissions of hazardous dust, it will thereby compound the injurious and potentially irreversible consequences for public health that are already occurring. A recent study determined that "each one-foot drop in lake elevation creates, on average, $151.5 million in respiratory mortality costs in the Salton Sea counties…"[92] The proximity to the Salton Sea of environmental justice communities, including but not limited to Tribes, ensures they will be subjected to significantly worsening harm as the Proposed Action causes rapidly accelerated decline of the lake, substantially exacerbates ecosystem deterioration, and greatly increases the emission of dangerous pollutants from the exposed lakebed and the degrading lake itself into the region's air.

The Proposed Action's adverse impacts on air quality foreseeably will also worsen Imperial County's federal nonattainment status for $PM_{2.5}$ and state nonattainment status for PM_{10}, and Riverside County's federal nonattainment status for PM_{10} and state nonattainment status for $PM_{2.5}$, and will also jeopardize Imperial County's federal attainment status for PM_{10} and Riverside County's federal attainment status for $PM_{2.5}$. In so doing, the Proposed Action will violate the Clean Air Act's General Conformity requirement[93] by causing or contributing to new violations, and/or increasing the frequency or severity of existing violations, and/or

[88] The current TAC list is online at: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

[89] For example, recent research concluded that dust from exposed Salton Sea lakebed causes lung inflammation that is distinct from the pulmonary effects of exposure to typical desert dust. Biddle, T.A. et al. (2023). Aerosolized aqueous dust extracts collected near a drying lake trigger acute neutrophilic pulmonary inflammation reminiscent of microbial innate immune ligands. *Science of the Total Environment* 858(3):159882, https://doi.org/10.1016/j.scitotenv.2022.159882.

[90] Farzan, S.F. et al. (2019). Assessment of Respiratory Health Symptoms and Asthma in Children near a Drying Saline Lake. *Int. J. Env. Res. Public Health*, 16(20):3828, https://doi.org/10.3390/ijerph16203828.

[91] https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHIB/CPE/Pages/CaliforniaBreathingCountyAsthmaProfiles.aspx.

[92] Jones, B.A. and Fleck, J. (2020). Shrinking lakes, air pollution, and human health: Evidence from California's Salton Sea. *Science of the Total Environment* 712(22):136490, http://dx.doi.org/10.1016/j.scitotenv.2019.136490.

[93] 42 U.S.C. § 7506(c).

delaying timely attainment of federal ambient air quality standards for $PM_{2.5}$ and PM_{10} in Imperial and Riverside Counties respectively, in a manner that does not conform to the State Implementation Plan for air quality.

The Proposed Action's adverse impacts on air quality will also cause negative socioeconomic effects across the Salton Sea region that will be cumulative and significant, as well as foreseeably unmitigated. Poor air quality is associated with increased medical expenses, increased loss of work days due to illness, decreased property values, decreased tourism and visitor satisfaction, and related decreases in visitor spending levels and economic impacts on businesses.[94]

IV.E. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on fish and wildlife reliant on the Salton Sea ecosystem

NEPA explicitly requires agencies to consider foreseeable adverse impacts of a proposed federal action on species listed as endangered or threatened under the U.S. Endangered Species Act, and on their habitat. Applicable law also requires agencies to consider harmful effects on other species, including but not limited to ones protected under the Migratory Bird Treaty Act[95] and various provisions of state law, in particular when the proposed action's affected environment includes "ecologically critical areas."[96] The DEIS unreasonably fails to present the legally required evaluation of pertinent issues.

The Salton Sea is a globally significant Important Bird Area (IBA) that has served as a crucial feeding, nesting, wintering, and stopover site for millions of birds of more than 400 species. For countless birds, including ones that face known threats to their continued survival, there is no other location that can substitute for their habitat in the Salton Sea ecosystem. It is foreseeable that the Proposed Action's water-use reductions will cause significant negative effects on aquatic, wetland, and riparian habitat, and will consequently cause injurious impacts on many, if not all, Special Status Species that depend on such habitat and are known to be present at the Salton Sea and around its perimeter, in wetlands and riparian areas associated with the Salton Sea and its tributaries, within IID's water service area, within CVWD's water service area, along the All-American Canal, along the Coachella Canal, and/or in other locations within the Salton Sea ecosystem. The Proposed Action will also foreseeably cause significant harm to migratory bird species covered by the protections of the Migratory Bird Treaty Act, as well as to other wildlife reliant on the Salton Sea ecosystem as "ecologically critical" habitat.[97]

The Proposed Action is ultimately very likely to cause many thousands of additional acres of Salton Sea lakebed to become exposed, beyond the areas that would otherwise have been exposed because of the QSA. Moreover, the inflow reductions resulting from the Proposed Action will substantially and rapidly increase the Salton Sea's salinity and will have other damaging impacts on water quality, all of which will degrade and foreseeably destroy the crucial lacustrine ecosystem that provides essential sustenance for fish and birds, including numerous Special Status Species. In addition, the Proposed Action's water-use reductions will result in substantial decreases in the flow of Salton Sea tributaries, including but not limited to agricultural drains and rivers that carry agricultural wastewater. The diminished flow will cause adverse impacts on aquatic, riparian, and wetland habitat; and those negative effects will result in significant injurious consequences for fish and wildlife, including Special Status Species. The failure of the DEIS to carefully and thoroughly evaluate these issues violates applicable law.

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[94] See, e.g., Tourism Economics. 2014. The Potential Economic Impact of the Salton Sea on the Greater Palm Springs Tourism Industry. https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/palmsprings/salton_sea_eis_ff17089f-eed9-4619-a89f-df859da583dc.pdf.

[95] 16 U.S.C. §§ 703-712. The list of birds protected pursuant to the MBTA is available at 50 CFR 10.13. The list was recently updated, effective August 1, 2023 (88 FR 49310).

[96] 40 CFR 1501.3(d)(2)(ii).

[97] Ibid.

Reclamation should have carefully analyzed the Proposed Action's foreseeable and significant adverse effects on all species known to be present in or likely utilizing the Salton Sea ecosystem that are listed as endangered or threatened under federal law and/or state law, and the agency should also have evaluated the foreseeable and significant negative impacts on numerous additional Special Status Species, migratory birds protected by the Migratory Bird Treaty Act, species of special conservation concern under federal and/or state law, and many other wildlife species dependent on the Salton Sea ecosystem as crucial habitat. Because Reclamation failed to conduct the required analysis, the agency must do so in a revised DEIS.

Protected avian species that are known to utilize the Salton Sea ecosystem and that foreseeably will be adversely affected by the Proposed Action include, but are not limited to, the following Special Status Species (including species designated as endangered or threatened under federal and/or state law, species proposed for listing as endangered or threatened under federal and/or state law, and species designated as of special conservation concern under federal and/or state law) and other species that are fully protected in California: Desert pupfish (*Cyprinodon macularius*), American peregrine falcon (*Falco peregrinus anatum*), American white pelican (*Pelecanus erythrorhynchos*), bald eagle (*Haliaeetus leucocephalus*), bank swallow (*Riparia riparia*), Barrow's goldeneye (*Bucephala islandica*), black tern (*Chlidonias niger*), black skimmer (*Rhynchops niger*), black tern (*Chlidonias niger*), brant goose (*Branta bernicla*), burrowing owl (*Athene cunicularia*), California black rail (*Laterallus jamaicensis coturniculus*), California brown pelican (*Pelecanus occidentalis californicus*), California gull (*Larus californicus*), Crissal thrasher (*Toxostoma crissale*), double-crested cormorant (*Nannopterum auritum*), elegant tern (*Thalasseus elegans*), elf owl (*Micrathene whitneyi)*, Gila woodpecker (*Melanerpes uropygialis*), gull-billed tern (*Gelochelidon nilotica*), laughing gull (*Leucophaeus atricilla*), least Bell's vireo (*Vireo bellii pusillus*), least bittern (*Ixobrychus exilis*), least tern (*Sternula antillarum*), Le Conte's thrasher (*Toxostoma lecontei*), lesser sandhill crane (*Grus canadensis canadensis*), long-billed curlew (*Numenius americanus*), long-eared owl (*Asio otus*), mountain plover (*Charadrius montanus*), northern harrier (*Circus cyaneus*), osprey (*Pandion haliaetus*), redhead (*Aythya americana*), short-eared owl (*Asio flammeus*), Southwestern willow flycatcher (*Empidonax traillii extimus*), summer tanager (*Piranga rubra*), vermillion flycatcher (*Pyrocephalus rubinus*), Western snowy plover (*Charadrius nivosus nivosus*), yellow warbler (*Setophaga petechia*), yellow-breasted chat (*Icteria virens*), Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), white-tailed kite (*Elanus leucurus*), and wood stork (*Mycteria Americana*). Reclamation should evaluate the harmful impacts of the Proposed Action on the foregoing species in a revised DEIS.

Additionally, the DEIS fails to analyze the impacts of the Proposed Action on many other protected species, including but not limited to ones listed under the Migratory Bird Treaty Act, which depend on ecologically critical habitat in the Salton Sea ecosystem and foreseeably will be greatly harmed by the Proposed Action. Those additional species are too numerous to specify here. The necessary analysis should be performed in a revised DEIS.

IV.F. The DEIS fails to analyze the Proposed Action's impacts on biogenic greenhouse gas emissions in the central Salton Basin and associated economic costs

Significant and costly biogenic greenhouse gas (GHG) emissions that will result from exposure of the Salton Sea's lakebed and deterioration of its ecosystem because of the Proposed Action are not considered at all in the DEIS, nor are the major economic costs of those GHG emissions. Federal guidance previously applicable to NEPA analyses explicitly required that agencies "must disclose and consider…the extent to which a proposed action and its reasonable alternatives (including the no action alternative) would result in reasonably foreseeable GHG emissions that contribute to climate change."[98] Moreover, previously applicable federal guidance stated that an agency's NEPA analysis should "quantify a proposed action's projected GHG emissions…for the expected lifetime of the action," and "provide additional context for

[98] National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (2023). Council on Environmental Quality, Executive Office of the President, January 4, 2023, Section IV.

GHG emissions, including through the use of the best available social cost of GHG (SC-GHG) estimates, to translate climate impacts into the more accessible metric of dollars, allow decision makers and the public to make comparisons, help evaluate the significance of an action's climate change effects, and better understand the tradeoffs associated with an action and its alternatives…"[99] Although the Trump administration's Council on Environmental Quality (CEQ) officially withdrew this guidance on May 28, 2025 pursuant to a broader deregulatory shift under Executive Order 14154, and although the administration has also directed agencies not to include analysis of GHG emissions and climate impacts in NEPA processes unless required by statute, the scientific basis for performing those analyses is very strong and well-established. I therefore suggest that the DEIS should have included an analysis of the significant biogenic GHG emissions, and the very large associated economic costs, that will foreseeably result from the effects of the Proposed Action on the Salton Sea and its ecosystem.

The Proposed Action's reductions in freshwater inflows to the central Salton Basin will cause large additional areas of carbon-rich Salton Sea lakebed to be exposed to the atmosphere, will push the lake into extreme hypersalinity, and will exacerbate breakdown of the lake's ecosystem. An important body of recent scientific research indicates these changes attributable to the Proposed Action will result in major quantities of biogenic greenhouse gases—including carbon dioxide, methane, and nitrous oxide—being emitted to the atmosphere on an ongoing basis for the foreseeable future unless an appropriate and effective restoration plan for the Salton Sea and its ecosystem is implemented.[100]

The biogenic GHG emissions attributable to the Proposed Action are likely to be very large. Assuming that only 40 square miles of additional Salton Sea lakebed will be exposed because of the Proposed Action (which is likely a large underestimate), and assuming that the exposed lakebed will emit only carbon dioxide and no methane or nitrous oxide (which are much more powerful greenhouse gases than CO_2 and are likely to be emitted in significant quantities from the exposed lakebed), and also assuming that there will be no other GHG emissions caused by the extremely detrimental changes to the Salton Sea and its ecosystem that will result from the Proposed Action (a conservative assumption, because it is very likely there will indeed be such additional GHG emissions), yields the conclusion that approximately 3 million metric tons of CO_2 will be emitted annually for the foreseeable future solely due to the Proposed Action.[101] This is a very conservative estimate for the quantities of ongoing GHG emissions attributable to the Proposed Action; the actual emission amounts will foreseeably be much bigger. But even 3 million metric tons of CO_2 emitted per year is a large and concerning quantity; it is equivalent to the annual emissions of 652,174 typical gas-fueled passenger vehicles.[102]

In the DEIS Reclamation also failed to consider the economic costs of the biogenic greenhouse gas emissions that will foreseeably result from the Proposed Action's negative effects on the Salton Sea and its ecosystem. The social cost of greenhouse gases (SC-GHG)—referred to more specifically in analyses performed in federal contexts as the social cost of carbon dioxide (SC-CO_2), the social cost of methane (SC-

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[99] Id., Section II.

[100] See the following peer-reviewed report and the references cited therein: Ross, J.E. (2022). Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans. Report submitted to the Salton Sea Long-Range Planning Committee of the Salton Sea Management Program, California Natural Resources Agency, January 27, 2022. 14 pp. https://doi.org/10.13140/RG.2.2.36775.62884. Also see the Supplementary Information for that report, explaining the possible magnitude of the greenhouse gas emissions at the Salton Sea if vast areas of lakebed are left exposed and the residual Salton Sea becomes extraordinarily hypersaline. https://doi.org/10.13140/RG.2.2.10089.36964. Numerous additional studies supporting the conclusions of the foregoing report and its supplementary information have been published since that report was prepared. In particular, a recent study of biogenic GHG emissions from the exposed lakebed of the Great Salt Lake determined the areas of lakebed that were desiccated as of 2020 emitted approximately 4.1 million tons of CO_2eq into the atmosphere during that year. Cobo, M., et al. (2024). A desiccating saline lake bed is a significant source of anthropogenic greenhouse gas emissions. *One Earth* 7(8):1414-1423, https://doi.org/10.1016/j.oneear.2024.07.001.

[101] This conclusion relies on the calculation method presented in the Supplementary Information for the report "Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans" (see the citation in footnote 100 above).

[102] https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle.

CH_4), and the social cost of nitrous oxide (SC-N_2O)[103]—is a metric that has been applied by federal agencies and some state agencies to estimate the economic costs incurred by society as a result of the emission of greenhouse gases. Prior to 2025, when President Trump told federal agencies to ignore the economic costs of GHG emissions unless required by statute to consider that issue, the SC-GHG metric was utilized across the entirety of the federal government when agencies evaluated the potential consequences of proposed policies or actions, including when conducting analyses pursuant to NEPA.[104] An evaluation of the climate impacts of proposed federal action that fails to include analysis of the SC-GHG implicitly and improperly assumes that the economic costs for society of GHG emissions, as well as the benefits of reducing those emissions, have a value of zero. It is firmly established both factually and scientifically that the actual costs and benefits are very far from zero, even for a single ton of CO_2.

The additional biogenic GHG emissions in the central Salton Basin that will foreseeably result from the Proposed Action, in combination with the large quantities of biogenic GHG emissions resulting from the QSA water transfers and from additional water cutbacks during 2024-2026,[105] could cause the associated economic costs of those GHGs to reach scores of billions of dollars in the coming years,[106] and could thwart California's efforts to attain carbon neutrality, thereby worsening climate change. I suggest the DEIS should have analyzed these reasonably foreseeable and significant adverse impacts of the Proposed Action, and should have suggested measures for avoiding such impacts or minimizing and fully mitigating them to the extent they cannot be avoided.

V. The DEIS violates the federal Indian trust responsibilities of Interior and Reclamation

Pursuant to the federal Indian trust responsibility, Interior and Reclamation have a legally enforceable fiduciary obligation and "moral obligations of the highest responsibility and trust"[107] to safeguard Tribal lands, natural and cultural resources, and other assets from damage, waste, and depletion; to protect Tribal health,

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[103] U.S. EPA (2023). Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. Available online at: https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf.

[104] The federal Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) previously recognized that the social cost of greenhouse gases should apply to all "relevant agency actions," and not just regulatory ones. (Interagency Working Group on the Social Cost of Greenhouse Gases (Feb. 2021), Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide – Interim Estimates under Executive Order 13,990, at p.14.) The IWG also previously noted that the social cost of greenhouse gases has been used previously in NEPA analyses in particular. (Id. at p.12.) Although President Trump recently disbanded the IWG, the scientific validity of their findings and recommendations remains well-established.

[105] In the Supplementary Information for my January 2022 GHG report, cited in footnote 100 above ("the Supplementary Information"), I explained the possible magnitude of the GHG emissions involved. To derive a rough estimate, I relied on source data for a lake that is the most similar to the Salton Sea of all the lakes for which data were available. I considered only CO_2 emissions and did not include any emissions of methane or nitrous oxide. My analysis indicated that a ballpark approximation of future biogenic CO_2 emissions if vast areas of lakebed are left exposed and the residual Salton Sea becomes extraordinarily hypersaline is 26 million metric tons per year. Although that rough estimate is a very large amount, it would be reasonable to consider it to be a conservative approximation of the actual GHG emissions involved, because my calculation did not include any emissions of CH_4 or N_2O, yet those GHGs are likely to be emitted in significant quantities.

[106] To perform the necessary calculation (which very conservatively assumes that no methane or nitrous oxide will be emitted), the estimated total emissions amount in the Supplementary Information cited in footnote 100 and described in footnote 105 should be used along with data in Appendix A, section A.5, Table A.5.1 of the following reference: U.S. EPA (2023), Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf. Although in 2025 President Trump instructed federal agencies to stop taking into account the economic damage caused by climate change unless required to do so by statute, no new guidance documents have been published by EPA and the scientific validity of the agency's 2023 Report on the Social Cost of Greenhouse Gases remains well-established.

[107] Seminole Nation v. United States, 316 U.S. 286 (1942)

safety, and welfare; and to faithfully carry out other mandates of federal law with respect to Tribal lands, resources, and assets, and for the protection and benefit of Tribal members.[108]

For example, Part 512, Chapter 2 of Interior's Departmental Manual, entitled Departmental Responsibilities for Indian Trust Resources, provides in part as follows (emphasis added):

> … 2.2. Policy. **It is the policy of the Department of the Interior to recognize and fulfill its legal obligations to identify, protect, and conserve the trust resources of federally recognized Indian tribes and tribal members, and to consult with tribes on a government-to-government basis whenever plans or actions affect tribal trust resources, trust assets, or tribal health and safety.**
>
> 2.3. Responsibilities.
>
> A. **Heads of bureaus and offices are responsible for identifying any impact of Departmental plans, projects, programs or activities on Indian trust resources. Department officials shall:**
>
> **(1)** Establish procedures to **ensure that the activities of Departmental organizations impacting upon Indian trust resources are explicitly addressed in planning, decision, and operational documents…**
>
> 2.4. Procedures.
>
> A. Reports. **As part of the planning process, each bureau and office must identify any potential effects on Indian trust resources. Any effect must be explicitly addressed in the planning/decision documents, including,** but not limited to, Environmental Assessments, **Environmental Impact Statements**, **and/or Management Plans prepared for the project or activity.** The documentation shall:
>
> (1) Clearly state the rationale for the recommended decision; and
> (2) Explain how the decision will be consistent with the Department's trust responsibility.
>
> B. Consultation. **In the event an evaluation reveals any impacts on Indian trust resources, trust assets, or tribal health and safety, bureaus and offices must consult with the affected recognized tribal government(s),** the appropriate office(s) of the Bureau of Indian Affairs, the Office of the Solicitor, and the Office of American Indian Trust. Each bureau and office within the Department shall be open and candid with tribal government(s) during consultations so that the affected tribe(s) may fully evaluate the potential impact of the proposal on trust resources and the affected bureau(s) or office(s), as trustee, may fully incorporate tribal views in its decision-making processes.

In addition, Part 303, Chapter 2 of Interior's Departmental Manual, entitled Principles for Managing Indian Trust Assets, provides in part as follows (emphasis added):

> 2.7 Trust Principles. **It is the policy of the Department of the Interior to discharge, without limitation, the Secretary's Indian trust responsibility with a high degree of skill, care, and loyalty. The proper discharge of the Secretary's trust responsibilities requires that persons who manage Indian trust assets:**
>
> A. **Protect and preserve Indian trust assets from loss, damage, unlawful alienation, waste, and depletion**…
>
> …
>
> M. **Protect treaty-based fishing, hunting, gathering, and similar rights of access and resource use on traditional tribal lands.**

[108] Department of the Interior, Departmental Manual, Part 303, Chapter 2, and Part 512, Chapter 2.

Reclamation's failure in the DEIS to identify, explicitly evaluate, and commit to minimizing and fully mitigating the foreseeable and significant impacts of the Proposed Action on Tribal lands, natural and cultural resources and other assets on those lands, as well as on Tribal health, safety, and welfare, violates the federal Indian trust responsibility and related statutes, regulations, case law, and policies.

The Desert Cahuilla Indians have lived in the northern Salton Trough for many thousands of years, and throughout that time have relied upon traditional Tribal lands and other cultural and natural resources and assets in the central Salton Basin, including but not limited to: large lakes; their shorelines, wetlands, and tributaries; associated wildlife, such as fish and birds; associated plants; and the area's groundwater and springs. The Desert Cahuilla also created and utilized culturally important sites, structures, and objects (e.g., stone fish traps and walk-in wells) for traditional Tribal activities in the Salton Basin related to the foregoing Tribal lands and other natural and cultural resources and assets.

The Tribal reservation lands of the Torres Martinez Desert Cahuilla Indians, a federally recognized Tribe, total approximately 24,000 acres directly adjoining the Salton Sea and its increasingly exposed lakebed, and also include regions of the lake itself, as well as areas that were previously within the lake but are now part of the exposed lakebed. Foreseeable and significant negative impacts of the Proposed Action affecting the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, and the health, safety, and welfare of Tribal members include, but are not limited to: hazardous, toxic, and carcinogenic dust blowing off of the Salton Sea's increasingly exposed lakebed as the Salton Sea shrinks from freshwater deprivation; toxic algae blooms in the lake and in associated wetlands and tributaries, and hazardous microbial components emanating from toxic algae blooms in the form of aerosol particles and droplets; noxious hydrogen sulfide gas being emitted from the lake and its marshes as the Salton Sea's water quality and ecosystem deteriorate; and the death and disappearance of originally profuse fish and bird populations.[109] It is foreseeable that all those injurious effects will be substantially exacerbated if the Proposed Action is implemented.

In the DEIS Reclamation should have: (a) fully evaluated the reasonably foreseeable types of harm that may result from the Proposed Action and adversely affect the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, and the health, safety, and welfare of Tribal members; b) consulted with the Torres Martinez Desert Cahuilla Indians concerning the Proposed Action, the details of the foreseeable harm that may affect the Tribe and its resources, and potential mitigation measures; and (c) committed to minimize and fully mitigate the harmful impacts of the Proposed Action on the Tribe.

Interior and Reclamation have failed to satisfy their legally enforceable Indian trust obligations with respect to injurious impacts on the Torres Martinez Desert Cahuilla Indians that are reasonably foreseeable effects of the Proposed Action.[110] The agencies have not consulted with the Torres Martinez Tribe regarding these specific issues in the manner required.[111] In addition, Reclamation has not presented an analysis in the DEIS of the foreseeable harmful effects of the Proposed Action on the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, or on the health, safety, and welfare of Tribal members; and Reclamation has not committed to minimizing and fully mitigating the harm to the Tribe that will foreseeably result from the Proposed Action. Reclamation's failure to discharge these duties violated the agency's Indian trust responsibility and applicable law.[112] This indefensible breach of Reclamation's and Interior's legally enforceable obligations must be fully remedied in a revised DEIS.

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[109] This recitation of harmful impacts on the Torres Martinez Desert Cahuilla Indians is not intended to be exhaustive.

[110] Reclamation may also have violated the agency's Indian trust responsibility with regard to other Tribes in the Salton Sea region.

[111] Salton Sea Authority (February 27, 2026). Public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, page 6. Available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf. The Torres Martinez Tribe is represented on the Board of the Salton Sea Authority, and is a signatory on the cited comment letter.

[112] Please note that I do not represent or speak on behalf of the Torres Martinez Desert Cahuilla Indians or any other Tribe. I offer these comments solely as a concerned citizen and as someone who has extensive knowledge about matters

VI. Cumulative and significant Salton Sea Impacts will foreseeably be devastating if Reclamation proceeds with the Proposed Action while failing to ensure those harmful consequences are avoided or minimized and fully mitigated

VI.A. Summary of cumulative and significant Salton Sea Impacts that will greatly harm fish and wildlife, the regional environment, the climate, and people throughout the Salton Sea area

In the DEIS, Interior and Reclamation should have carefully considered all of the following cumulative and significant Salton Sea Impacts, and other harmful consequences in the Salton Sea region, that foreseeably will result from the Proposed Action. Interior and Reclamation must properly evaluate all these impacts of the Proposed Action, and other adverse consequences, in a revised DEIS. This discussion is not intended to be an exhaustive itemization of all foreseeable, cumulative, and significant Salton Sea Impacts.

- Major decreases in the volume, depth, and surface area of the Salton Sea will occur. The resulting harmful impacts will include, but may not be limited to, dangerously degraded water quality, loss of habitat for fish and wildlife, associated injurious biological and ecological consequences, and exposure of vast areas of additional Salton Sea lakebed.

- Huge additional quantities of hazardous particulates (PM_{10} and $PM_{2.5}$) originating from the exposed Salton Sea lakebed will be chronically emitted into the region's atmosphere, fouling air quality and greatly endangering public health. Harmful dust and aerosol droplets will be released from exposed lakebed and from the deteriorating Salton Sea, as well as from other degrading waterbodies in the Salton Sea ecosystem suffering from freshwater deprivation. The particulates are known to contain dangerous, toxic, and carcinogenic constituents, including but not limited to heavy metals, PCBs, and residues of banned pesticides that would otherwise be sequestered in undisturbed sediments beneath the waters of the Salton Sea. Microcystins and other toxins derived from harmful algae blooms that pose inhalation, ingestion, and dermal-contact hazards will also very likely be components of dust emitted from the exposed lakebed, and in the aerosol droplets discharged from the shriveling lake and other waterbodies. *Coccidioides* spores, which cause potentially fatal coccidioidomycosis (Valley Fever), and other hazardous microbial materials are foreseeably present in the dust and aerosol droplets as well. Dangerous emissions of particulates from exposed lakebed will occur on an ongoing basis regardless of dust mitigation activities, because such measures can somewhat reduce the problem but cannot eliminate it.

- Greatly worsened public health threats will cause increased morbidity and mortality.[113] More than half a million people throughout the region adjacent to the Salton Sea—including Tribes and other disadvantaged communities—will be obliged to breathe hazardous, toxic, and carcinogenic particulates emitted into the region's air from exposed Salton Sea lakebed, and to suffer ongoing exposure to toxins from harmful algae blooms, other dangerous microbial materials being emitted from the degraded Salton Sea and associated deteriorating waterbodies, and increasing releases of noxious fumes, such as hydrogen sulfide. It is foreseeable that serious diseases and fatalities will consequently occur.

- There will be rapid and significant increases in the salinity of the residual Salton Sea, as well as other negative effects on water quality, including but not limited to decreases in dissolved oxygen and increased concentrations of hazardous contaminants. The residual Salton Sea will eventually be

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related to the past, present, and future of the Salton Sea and associated issues affecting people throughout the surrounding region, including but not limited to Tribes.

[113] See the discussion in Part IV.D. above, and the references cited in footnotes 30, 31, 32, 33, 34, and 92.

pushed into a state of extreme hypersalinity in which the lake will be ecologically useless and incapable of supporting any organisms other than halophilic bacteria, archaea, viruses, and other microorganisms—many of which may be harmful to wildlife and people.

- The remaining Salton Sea fish and invertebrates—which have provided an essential food supply for millions of migratory and resident birds—will be extirpated in the residual lake as a result of physiologically intolerable salinity levels, and potentially in part because of other adverse impacts on water quality. They will also likely be extirpated from some, if not all, associated wetlands and tributaries as those waterbodies are adversely affected by freshwater deprivation.

- Rapid deterioration and loss of crucial habitat for hundreds of species of birds will foreseeably occur. In particular, there will likely be loss of essential habitat for millions of migratory birds that depend on the Salton Sea ecosystem during twice-yearly migrations, and that have no other appropriate resting and feeding locations in a vast arid region as they travel enormous distances. Most or all essential aquatic habitat will be lost.

- Crowding of birds in remaining usable areas of habitat is likely to enhance avian disease transmission, cause outbreaks that are difficult to control, and result in major die-offs of birds.

- There will be greatly increased threats to the continued existence of migratory and resident avian species that are already designated as endangered, threatened, or of special concern under federal and/or state law and that depend on the Salton Sea ecosystem for resting, feeding, and/or breeding.

- Also in jeopardy will be the continued survival of the desert pupfish (*Cyprinodon macularius*), which is already designated as an endangered species under the U.S. Endangered Species Act and California law, and is reliant on the Salton Sea ecosystem.

- Threats to the health and survival of numerous species will result from increased contact with and ingestion of contaminated sediments in exposed Salton Sea lakebed, and hazardous substances in polluted tributary water that will flow undiluted across expanses of exposed lakebed and attract wildlife. In addition, the food web will be affected by potentially dangerous biomagnification of some pollutants.

- Exposure and drying of portions of the central region of the Salton Sea lakebed will pose additional and particularly significant threats to wildlife and people. Ongoing research has established that elevated levels of hazardous, toxic, and carcinogenic contaminants are highest in Salton Sea sediments within the central region of the lakebed.[114] It is therefore foreseeable that exposure of central lakebed areas and emission of fugitive dust from them will result in particularly consequential adverse impacts on air quality and public health. In addition, because the most contaminated lakebed areas will be exposed adjoining the residual Salton Sea, it is also likely there will be increased harmful effects on wildlife drawn to the remaining water.

- Major quantities of greenhouse gases—including carbon dioxide, methane, and nitrous oxide—will come from numerous biogenic sources within the original Salton Sea footprint. The biogenic GHG emissions will come from a variety of sources, including but not limited to: vast areas of exposed lakebed (including dry lakebed sediments, intermittently rewetted sediments, and sediments that are disturbed—e.g., by furrowing for dust control); tributary streams dispersing across large expanses of exposed lakebed; and the residual Salton Sea as it becomes extremely hypersaline.[115] The quantities of the GHG emissions could be so large they will undermine federal and state statutory and policy

[114] Statements by Dr. Timothy Lyons (University of California, Riverside) during the May 16-17, 2023 California State Water Resources Control Board workshop on the Salton Sea. (Video of the workshop is available online at: https://www.waterboards.ca.gov/board_info/video.html. Dr. Lyons speaks during Panel 4 on May 17.)

[115] See the report and other information cited in footnote 100.

objectives related to achieving net-zero emissions, and will worsen climate change.[116] In addition, the potentially enormous scale of the GHG emissions involved could ultimately result in the cumulative economic cost of those emissions reaching at least scores of billions of dollars—and possibly much greater amounts—during the coming decades.[117]

- Areas of the Salton Sea lakebed containing unexploded ordnance (UXO), which was dropped into the lake during wartime military training activities in the 1940s and 1950s, are likely to be exposed as the Salton Sea shrinks. Exposure of UXO could pose significant public safety risks. None of the UXO risk areas is expected to be cleaned up by the Department of Defense until after 2028, and most will not be remediated until 2038 or much later.[118]

- All aspects of the economy across the Salton Sea region will suffer negative impacts because of deteriorating environmental conditions and increasing threats to public health, fish, and wildlife. The adverse effects will include, but will not be limited to, major economic harm to all types of businesses and industries, decreased property values, lost work days, increased medical expenses, and loss of tourism.

- The region's important agricultural industry will be negatively affected by threats to the health of workers from hazardous, toxic, and carcinogenic airborne particulates, and by deposition onto crops of damaging salt particles and contaminants blown from increasing areas of exposed Salton Sea lakebed. These impacts on agriculture will compound the negative economic effects throughout the region that will be caused by the loss of large quantities of Colorado River water needed for irrigation, and by the related fallowing of farm fields, decreased crop production, reduced employment, and diminished income for farmers and businesses associated with agriculture.

- Significant adverse impacts on the environment in the Salton Sea region will foreseeably affect major military installations and impair essential military operations, with potential negative consequences for military readiness and national security. Worsening dust storms containing dangerous particulates emanating from the central Salton Basin will impact the functions of the El Centro Naval Air Facility (NAS El Centro) in Imperial County, because flights to and from NAS El Centro will be grounded during major dust storms within the Salton Basin. Potential harmful health effects on military personnel are also foreseeable. In addition, critical military air operations at the Chocolate Mountain Aerial Gunnery Range (CMAGR) will be negatively affected by large quantities of fugitive dust from exposed Salton Sea lakebed. The CMAGR is located adjacent to the Salton Sea, to the east and southeast of the lake, and is in the direct path of hazardous particulates blown from exposed lakebed by prevailing winds.[119]

- Unsafe air quality in the central Salton Basin could jeopardize commercial-scale lithium extraction, an emerging industry that is anticipated to be central for U.S. efforts to develop renewable energy and fight climate change in the coming years. Chronic impairment of air quality with hazardous particulates containing toxic and carcinogenic constituents will likely be worst in the area where lithium extraction and processing facilities must be located, within the Salton Sea Geothermal Field near the southeast shore of the Salton Sea. Prevailing winds blowing across the exposed lakebed and the residual, degraded Salton Sea will push airborne pollutants directly into that area. It is foreseeable that dangerous air quality will impair the ability of the lithium industry to attract the

[116] See the information in footnote 105.

[117] See the information in footnote 106.

[118] Final Environmental Assessment/Combined Decision Document for the Salton Sea Management Program (SSMP) Phase 1: 10-Year Plan (2024), Appendix 1, Table 4-27. https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/Salton-Sea-Management-Plan/.

[119] Similar problems previously afflicted Naval Air Weapons Station China Lake in the western Mojave Desert region of California because of dust storms emitted from desiccated Owens Lake. Frequent and extremely costly cessation of important military activities was necessary due to unsafe air quality and impaired visibility.

large numbers of skilled workers it will require, and will adversely affect the health of those who choose to work at the necessary facilities near the shriveling and deteriorating Salton Sea.

- Major shrinkage of the Salton Sea plus foreseeable curtailment of irrigated agriculture in the Imperial Valley (and in the Coachella and Mexicali Valleys) will negatively affect Salton Trough climate and hydrology, and possibly climate and hydrology in other areas of the Colorado River Basin as well.[120] Very large decreases in the previously immense quantities of water vapor injected into the regional atmosphere by evaporation from the full Salton Sea's surface, and reduced evapotranspiration from areas of irrigated crops due to constraints on Colorado River water allocations, will engender hotter ambient temperatures and dryer hydrologic conditions across the region. It is foreseeable that those effects will in turn cause negative impacts on public health and wildlife, as well as on agricultural production and other aspects of the regional economy. In addition, a detrimental feedback effect could result from the higher temperatures and drier hydrology related to the lake's shrinkage, causing further decreases in water availability, lower inflows to the central Salton Basin, additional decline of the residual Salton Sea, and even hotter and drier climate conditions.

- The Proposed Action will foreseeably result in violations of federal and state statutes, regulations, and policies related to air quality, water quality, threatened and endangered species, climate, occupational safety and health, food safety, and other important matters administered and enforced by government entities. The federal statutes that are likely to be violated include, but are not limited to, the Clean Air Act, the Clean Water Act, and the Endangered Species Act.

VI.B. Reclamation cannot properly rely on the SSMP 10-Year Plan and the USACE's ISSS Study to address Salton Sea Impacts of the Proposed Action

In the DEIS, Reclamation relies on the State of California's SSMP 10-Year Plan[121] and the ISSS Study being performed by the U.S. Army Corps of Engineers as the sole measures to avoid, or minimize and fully mitigate, all harmful Salton Sea Impacts of the Proposed Action. That reliance is seriously misplaced. Those state and federal activities are important but are clearly insufficient even to address the harm currently affecting the Salton Sea ecosystem, fish and wildlife, the environment, and people as a result of the QSA water transfers and additional recent water cutbacks; they will be grossly inadequate to avoid, or minimize and fully mitigate, the greatly exacerbated crisis that will result from Reclamation's Proposed Action.

VI.B.1. The SSMP 10-Year Plan is insufficient for avoiding or mitigating the harmful impacts of the Proposed Action

As explained in Part II above, the SSMP is lagging extremely far behind in its attempted compliance with the SWRCB Stipulated Order that mandates a specific time-table during 2018-2028 for implementation of habitat creation and dust suppression measures pursuant to the 10-Year Plan. Consequently, it is clear that completion of the 10-Year Plan will not occur by 2028 as required, and in fact the SSMP's activities will fall very far short of creating the minimum required grand total of 29,800 acres of habitat and dust suppression measures that must be finished and operational by then. In addition, the significant funding necessary to build and operate the components of the 10-Year Plan has not been secured, and various other essential

[120] See, e.g., Lo, M. and Famiglietti, J. S. (2013). Irrigation in California's Central Valley strengthens the southwestern U.S. water cycle. *Geophysical Research Letters* 40: 301–306. https://doi.org/10.1002/grl.50108.

[121] Final Environmental Assessment/Combined Decision Document for the Salton Sea Management Program (SSMP) Phase 1: 10-Year Plan (2024), https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/Salton-Sea-Management-Plan/.

preconditions for executing the plan have not been met. Therefore, full implementation of the 10-Year Plan, even belatedly, is not guaranteed.

Moreover, it is becoming increasingly clear that major components of the 10-Year Plan will not be implemented at all due to a lack of feasibility, and—at best—other much smaller and less effective components are likely to be substituted for them. For example, the original proposed plans for the "North Lake Pilot Demonstration Project" and the "North Lake Project"—the 10-Year Plan's largest projects in the northern portion of the Salton Sea's original footprint that were designed to create aquatic habitat and cover emissive lakebed—will not be implemented, because geotechnical assessments have determined they are infeasible for fundamental reasons, including but not limited to inadequate available water and unsafe levels of seismic risk.[122] Although the SSMP is currently considering alternatives to the original, infeasible projects, it is apparent that none of the potential alternatives will provide the types and extent of habitats previously envisioned, and will also not provide dust suppression across the expanses of exposed Salton Sea lakebed intended to be covered by the projects as originally formulated.[123]

Even if it is assumed that the rest of the 10-Year Plan, apart from the North Lake Pilot Demonstration Project and North Lake Project, will actually be implemented in the future, realistically it appears that will not occur for at least several years beyond 2028. Furthermore, even if a partial 10-Year Plan is belatedly implemented, it will not prevent fish and wildlife, the environment, the climate, and people throughout the Salton Sea region from suffering severe and potentially irreparable harm from the Proposed Action in the future. The limited 10-Year Plan components will not be adequate to restore the habitats necessary for permanently supporting the number and variety of wildlife species, including threatened and endangered ones, originally reliant on the Salton Sea ecosystem—as required by California's Salton Sea Restoration Act.[124] In addition, the partial and belatedly implemented 10-Year Plan will also not be sufficient to prevent a variety of other harmful impacts resulting from the Proposed Action, including but not limited to: (a) large, ongoing emissions of hazardous, toxic, and carcinogenic particulates from exposed lakebed and the deteriorating Salton Sea itself; (b) serious harm to human health across a large region; (c) major greenhouse gas emissions from vast areas of exposed lakebed, the residual exceedingly hypersaline Salton Sea, and relatively small and shallow impoundments; and (d) enormous economic costs resulting from all of the foregoing types of harm.

VI.B.2. The activities of the USACE related to the ISSS Study will not adequately address the harmful impacts of the Proposed Action

The USACE's ISSS Study is a multi-year feasibility study initiated in 2023 that is exploring various proposed options for partial revitalization or full restoration of the Salton Sea. The ISSS Study is currently at a very early stage, and is not fully funded.[125] In addition, as explained in Part II above, the Corps is severely

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[122] Salton Sea Authority Board Meeting, November 20, 2025, agenda item IV.F.1. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/

[123] Ibid.

[124] California Fish and Game Code Chapter 13, Sections 2930 et seq. Restoration of the Salton Sea has become even more crucial recently because the Great Salt Lake is also shrinking, and its ecosystem is also collapsing, from freshwater deprivation. The demise of both lakes would imperil the continued survival of millions of migratory birds, including threatened and endangered species.

[125] Statements by Corrie Stetzel, USACE Water Resources Planner, and Patrick O'Dowd, Executive Director/General Manager of the Salton Sea Authority, during the Salton Sea Authority Board Meeting on November 20, 2025, agenda item IV.C. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. See also: https://www.spl.usace.army.mil/Missions/Civil-Works/Projects-and-Studies/Imperial-Streams-Salton-Sea/; and Salton Sea Authority, February 27, 2026 public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf.

hampered in conducting the ISSS Study because of major jurisdictional constraints, as well as additional self-imposed limitations on the scope and details of its feasibility study. Moreover, it is presently anticipated that—even assuming full funding for the ISSS Study becomes available in the near future—the study will not be completed (to the final stage of the USACE process, which is issuance of a Chief's Report) until the end of calendar year 2029, at which point approval of, and funding for, the recommended project will still need to be sought from Congress in order to accomplish the project.[126] Even assuming Congressional approval and funding for project implementation will ultimately be obtained, subsequently it will likely take years to complete the project and render it fully operational. Therefore, the activities of the USACE related to the ISSS Study will have no effect on the harmful impacts of the Proposed Action until long after 2030.

Furthermore, depending on the details of the USACE project selected for ultimate implementation, that project may or may not actually be effective in very belatedly addressing the harmful consequences of the Proposed Action. As noted above and explained in Part II, the USACE's jurisdictional constraints and self-imposed subject-matter limitations for the ISSS Study may fundamentally cripple the ability of the Corps to design and implement an appropriate, effective, and sustainable project. In addition, if an in-basin project dependent on Colorado River wastewater is selected as the project the Corps will implement, it will suffer from the significant, inherent, and potentially fatal problems described in Part VII.A. below, and consequently it will not avoid, or even effectively mitigate, the harm to people, fish and wildlife, the environment, and the climate that will result from the Proposed Action. In fact, the project may even fail completely because the Colorado River water necessary to sustain it is not available, or for other reasons. On the other hand, even if an ocean water importation plan for full restoration of the Salton Sea is selected for implementation by the USACE as the result of the ISSS Study—which currently appears very unlikely in light of the major jurisdictional constraints affecting the work of the Corps, in combination with the USACE's self-imposed limits on the scope and details of its study—realistically such a project will not be approved, funded, and implemented in time to avert the many types of significant harm that foreseeably may result quickly from the Proposed Action.

There will be devastatingly harmful consequences if the Proposed Action is implemented and the selected USACE project is not ultimately approved and funded by Congress, or the USACE selects an in-basin project for implementation and that project fails because the necessary Colorado River water is not available, or is unsuccessful for other reasons. In that case, the partial, belated, and seriously inadequate 10-Year Plan components would be the only measures implemented for revitalization or restoration of the Salton Sea ecosystem, and the harmful consequences would be dire. The consequences would be even more devastating if the partial 10-Year Plan also fails because of a lack of Colorado River water or for other reasons. People, wildlife, the environment, and the climate will suffer catastrophic harm as the residual deteriorating Salton Sea becomes ecologically useless and hazardous, huge quantities of toxic and carcinogenic particulates chronically spew from the exposed lakebed and the degenerated residual lake, and major quantities of biogenic greenhouse gases are emitted from all across the central Salton Basin within the Salton Sea's original footprint. This scenario is entirely foreseeable.

It is incumbent on Interior and Reclamation to identify and commit to implementing effective measures for avoiding, or minimizing and fully mitigating, the harmful Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action. Interior and Reclamation must do so in a revised DEIS without making any assumptions about the implementation or effectiveness of the 10-Year Plan or the USACE ISSS Study.

[126] Statements by Corrie Stetzel and Patrick O'Dowd during the November 20, 2025 Salton Sea Authority Board Meeting, supra. The USACE and the Salton Sea Authority currently anticipate, as explained by Ms. Stetzel and Mr. O'Dowd, that the project selected for implementation by the USACE as a result of the ISSS Study will be authorized by Congress in the 2030 cycle of the Water Resources Development Act, and subsequently funded by an appropriations bill.

VII. To avert devastating consequences of the Proposed Action, permanent restoration of the Salton Sea is necessary

In order to avoid, or effectively minimize and fully mitigate, the cumulative and significant harmful impacts of the Proposed Action, it is essential for Interior and Reclamation to develop and undertake actions that will result in permanent restoration of the Salton Sea ecosystem. I suggest this should be accomplished as part of the Post-2026 Program, in consultation or collaboration with the U.S. Army Corps of Engineers and other federal and state agencies as appropriate.[127] As explained above, the ongoing ISSS Study by the Corps is severely hampered by fundamental jurisdictional constraints, as well as by self-imposed limitations related to reliance on the SSMP's inadequate and scientifically unsound Long-Range Plan,[128] including but not limited to reliance on the biased and fatally flawed analysis, findings, and conclusions of the U.C. Santa Cruz panel[129] that the SSMP incorporated into the Long-Range Plan. Therefore, in order to effectively address the harmful consequences of the Proposed Action, it is necessary for Interior and Reclamation to engage with the USACE and other federal and state agencies to ensure that appropriate and permanent restoration of the Salton Sea is accomplished. If Interior and Reclamation need additional authorities in order to perform the necessary activities, they should immediately pursue obtaining those authorities.

Numerous long-term plans have been proposed to address the Salton Sea crisis and revitalize or restore the lake and the Salton Sea ecosystem in different ways and to varying degrees. The proposed plans fall into two general categories: (a) in-basin plans that use only the water already available as inflow into the central Salton Basin, nearly all of which is a shrinking supply of Colorado River wastewater,[130] to create impoundments on the exposed Salton Sea lakebed for habitat and recreation; and (b) ocean water importation plans, which propose to refill the Salton Sea and restore its ecosystem either by using desalinated ocean water (imported from either the Gulf of California or the Pacific Ocean), or by using imported ocean water that is not desalinated, in combination with some sort of outflow mechanism to prevent salts from continuing to accumulate in the lake.[131]

VII.A. In-basin restoration options

1. Proposed in-basin restoration plans, which are more accurately described as partial revitalization options, all rely on huge amounts of Colorado River wastewater flowing into the central Salton Basin to fill large earthen impoundments constructed on the Salton Sea's exposed lakebed to create habitat areas and recreational opportunities. The sizes and configurations of the impoundments vary from one proposed in-basin plan to another; however, all plans use excavated lakebed sediments to construct the impoundments and other features such as levees and causeways, and all plans use Colorado River wastewater to fill the impoundments. In-basin plans also employ dust mitigation measures on other portions of the exposed lakebed (e.g., deep

[127] For example, it may also be appropriate or necessary for the International Boundary and Water Commission to be involved.

[128] See my detailed public comments submitted to the CNRA and SSMP regarding the 2023 SSMP Draft Long-Range Plan, available at: https://doi.org/10.13140/RG.2.2.33676.37768.

[129] See my detailed public comments submitted to the CNRA and SSMP regarding the work of the U.C. Santa Cruz panel, available at: https://doi.org/10.13140/RG.2.2.30320.93448.

[130] As Interior and Reclamation are aware, a relatively small portion of the inflow into the central Salton Basin comes from local tributaries, groundwater, and stormwater. The rest is Colorado River wastewater, most of which derives from Imperial County's agricultural use of IID's allotment of the river's water, as noted above. Additional inflow is wastewater from agricultural, municipal, and industrial use of Colorado River water in the Coachella Valley and northwest Mexico.

[131] For purposes of these comments, "ocean water importation," "seawater importation," "the use of ocean water" to restore the Salton Sea, and other similar phrases mean any restoration plan using either of those two general approaches. Many ocean water importation plans of those two types have been proposed during the past few decades.

furrowing to inhibit airborne movement of particles), and they include at least one large brine sink in the central basin that is incapable of supporting fish or wildlife.

2. The dependence of in-basin plans on the continued availability of enormous volumes of Colorado River wastewater flowing annually into the central Salton Basin in perpetuity is exceedingly problematic if not completely untenable.[132] Worsening climate change, significantly decreasing Colorado River streamflow,[133] and tightening restrictions on use of the river's water will jeopardize the existence of the inflow amounts required by in-basin plans, and will threaten the efficacy and sustainability of all such plans. Consequently, all in-basin plans will face a substantial risk of failure if implemented. In the event that a very costly in-basin plan is ineffective or becomes inoperable because of water constraints, enormous amounts of money will have been wasted, and the devastating consequences for wildlife, people, the environment, and the climate will be tantamount to the dire impacts of a no-action scenario. Although permanent restoration conceivably could be accomplished using an in-basin plan if a very large annual amount of Colorado River water is specifically and irrevocably allocated to the Salton Sea, that approach is clearly infeasible because of the many legitimate and competing demands for the river's over-allocated and declining water supply.

3. In addition to their problematic and likely unsustainable dependence on the use of Colorado River water, all in-basin plans suffer from many other significant inherent flaws that render them seriously inadvisable and undermine their viability. For example:

    a. Wastewater containing dangerous pollutants will be relied upon as the sole water source for impoundments to be used as habitat and for recreational activities, exposing both wildlife and people to known and serious risks of harm. The hazardous, toxic, and carcinogenic pollutants in the water include, but are not limited to, pesticide residues (from both banned legacy pesticides such as DDT and ones in current use), heavy metals (e.g. arsenic, lead, chromium, nickel, and cadmium), polychlorinated biphenyls (PCBs), components of untreated wastewater crossing the international border from Mexico (potentially including pathogens), various industrial chemicals released from Mexican factories, microcystins from harmful algae blooms, and elevated levels of selenium.

    b. Lakebed and deltaic sediments contaminated with hazardous, toxic, and carcinogenic substances, including but not limited to the ones noted above, will be excavated and used to create and maintain impoundments, dikes, levees, islands for wildlife to nest and loaf, and other earthen structures such as causeways and embankments to be used by people (e.g., for driving, hiking, birdwatching, fishing, and launching boats). Through a variety of exposure pathways, the contaminants in sediments will pose known risks of significant harm to both wildlife and people.

    c. The essential components of in-basin plans, including but not limited to impoundments, dikes, levees, causeways, and other infrastructure, will be constructed on the Salton Sea lakebed on top of or adjacent to significant active faults and seismic zones. In the event of a large earthquake (which is highly likely to happen during the life of a long-term restoration plan), major ground motion and extensive liquefaction of sediments in the Salton Sea footprint will occur, and will likely cause critical infrastructure built on top

[132] The amount of inflow required by in-basin plans varies among the proposed restoration concepts. The minimum quantity necessary for the in-basin concept with the smallest water requirement, taking into account the effects of climate change in the coming decades, is approximately several hundred thousand acre-feet per year. Other proposed in-basin plans require, roughly, as much as double that amount. Importantly, the suggested concepts with lower water requirements necessarily entail leaving much greater expanses of lakebed exposed, and they will therefore result in significantly larger emissions of hazardous fugitive dust and biogenic greenhouse gases from the exposed lakebed on an ongoing basis.

[133] For example, see the studies cited in footnotes 11 and 12.

of the lakebed to be incapacitated and destroyed. Levees, dikes, and causeways will be cut by shearing forces causing co-seismic displacements of as much as 6 meters,[134] impoundments will collapse, and access roads on the lakebed will be disabled. Such a dangerous scenario will pose major threats to public safety, and will necessitate rebuilding the project—which might not even be feasible.

d. Huge quantities of dangerous particulates (PM_{10} and $PM_{2.5}$) in the form of dust and aerosol droplets containing hazardous, toxic, and carcinogenic components will be emitted from vast areas of lakebed that will be left exposed by in-basin plans, and will also be released from the residual, degraded Salton Sea. The chronic emissions will negatively affect regional air quality and endanger the health of roughly 600,000 people throughout the surrounding region (and potentially a significantly greater number, including the populations of western Riverside County and Los Angeles County in California, Yuma County in Arizona, and the city of Mexicali in Mexico).

e. Major quantities of greenhouse gases—including carbon dioxide, methane, and nitrous oxide—are likely to be emitted on an ongoing basis for the foreseeable future from exposed Salton Sea lakebed and other features of in-basin restoration plans.[135] The quantities of biogenic GHG emissions involved could ultimately be so large that California's plan to attain net-zero carbon emissions will be derailed, and climate change will be worsened.[136]

f. The economic cost of the biogenic GHG emissions (SC-GHG) associated with in-basin plans that leave vast areas of lakebed exposed and include other components that are also likely to emit major quantities of GHGs on an ongoing basis is likely to reach at least scores of billions of dollars during the life of a long-term restoration plan, and could soar far higher than that.[137]

g. The inhabited region adjacent to the Salton Sea—the area that will be most negatively impacted if an ineffective and/or unsustainable in-basin restoration plan is implemented—encompasses disadvantaged populations bearing major burdens of environmental injustice.[138] The people living and working there are already adversely

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[134] See, e.g., Kyriakopoulos, C., et al. (2019). Dynamic Rupture Scenarios in the Brawley Seismic Zone, Salton Trough, Southern California. *JGR Solid Earth* 124(4), 3680-3707, https://doi.org/10.1029/2018JB016795.

[135] See the report and other information cited in footnote 100 above.

[136] A rough ballpark estimate of the total quantities of GHG emissions involved is the amount calculated in the Supplementary Information referenced and described in footnotes 100 and 105 above—i.e., 26 million metric tons of CO_2 annually.

[137] The relevant calculation is performed using estimated emissions amounts and the data in Appendix A, section A.5, Table A.5.1 of the following report: U.S. EPA (2023). Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf. Although in 2025 President Trump instructed federal agencies to stop taking into account the economic damage caused by climate change unless required to do so by statute, no new guidance documents have been published by EPA and the scientific validity of the agency's 2023 Report on the Social Cost of Greenhouse Gases remains well-established.

[138] The Council on Environmental Quality's Climate and Environmental Justice Screening Tool (CEJST) identifies the locations and extent of disadvantaged communities, including but not limited to Federally Recognized Tribes, and shows that the entire Salton Sea region consists of such populations. CEQ developed the CEJST as required by Executive Order 14008. It is a geospatial mapping tool that federal agencies have been directed to use "to identify disadvantaged communities. These communities have been marginalized by society, overburdened by pollution, and underserved by infrastructure and other basic services. The CEJST uses publicly-available, nationally-consistent datasets [that] are indicators of burdens that disadvantaged communities face. These burdens are related to climate change, the environment, health, and economic opportunity." (Instructions to Federal Agencies on Using the Climate and Environmental Justice Screening Tool," CEQ, Executive Office of the President of the United States, January 2023, page 2.) A memorandum

affected by hazardous particulate emissions, hydrogen sulfide irruption events, harmful blooms of toxic algae, and other serious problems caused by shrinkage and deterioration of the Salton Sea related to the QSA water transfers.[139] The serious concerns of those communities include, but are not limited to, significant and disproportionate pulmonary illness associated with chronic inhalation of dangerous particulates being emitted from increasingly exposed Salton Sea lakebed. The proximity of disadvantaged populations to the Salton Sea ensures they will be subjected to worsening harm as the lake continues to shrivel and the ecosystem deteriorates further toward complete collapse.[140] Because of the fundamental limitations and problems intrinsic to all in-basin restoration plans, increased morbidity and mortality in communities near the Salton Sea will occur if such a plan is implemented.[141]

VII.B. Ocean water importation options

1. Proposed ocean water importation plans entail refilling the Salton Sea and restoring a robust aquatic ecosystem capable of supporting the number and diversity of species originally reliant on the huge lake. Pursuant to such a plan, millions of birds and hundreds of millions of fish could again be sustained by the Salton Sea. In broad terms, the proposed concepts would accomplish restoration by utilizing either: (a) desalinated seawater from the Gulf of California or Pacific Ocean imported into the Salton Basin; or (b) imported seawater that is not desalinated, in combination with some sort of outflow mechanism to prevent salts from continuing to accumulate in the lake. Various ocean water importation plans of these two general types have been proposed, some of which involve recent technological advancements.

2. An ocean water importation plan would avoid all of the many serious problems afflicting in-basin plans, including all of the important difficulties noted in Part VII.A above. Utilizing ocean water to refill the Salton Sea and reestablish its ecosystem is the only approach that can break the tight linkage between Colorado River water use and sustenance of the Salton Sea, achieve permanent restoration of the lake, and protect both wildlife and people from significant harm. Specifically:

    a. An ocean water importation plan would fully restore essential Salton Sea habitat to conserve hundreds of species that will otherwise face grave threats to their survival. Moreover, restoring the Salton Sea with ocean water would avoid the substantial ongoing risks to both wildlife and people posed by in-basin plans that necessarily rely

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from the Executive Office of the President to the heads of federal executive departments and agencies dated January 27, 2023 stated that federal agencies should immediately start using the CEJST to identify geographically defined disadvantaged communities for purposes of analyzing environmental justice issues. The Climate and Environmental Justice Screening Tool was previously available online at https://screeningtool.geoplatform.gov/en/#8/33.045/-115.98 but was removed by the Trump administration. Subsequently the screening tool was restored online by the Environmental Data and Governance Initiative, and is available at https://public-environmental-data-partners.github.io/j40-cejst-2/en/#3/33.47/-97.5.

[139] See the references cited in footnotes 30, 31, 32, 33, and 34 above

[140] As discussed previously, one significant concern is the fact that inhabited tribal reservation lands of the Torres Martinez Desert Cahuilla Indians adjoin portions of the Salton Sea's exposed lakebed. There are also other Tribes in the Salton Sea region.

[141] For example, in addition to the research highlighted in footnotes 30, 31, 32, 33, and 34, another study concluded: "Between 1998 and 2014, the shrinking Salton Sea was associated with PM2.5 changes that increased lower respiratory mortality outcomes by…1.4/yr.–15.6/yr. in aggregate… [C]hanges in the amount of exposed lake bed around the Salton Sea are responsible for $13.2–$147.3 million per year in lower respiratory mortality costs associated with PM2.5 exposure… [E]ach one-foot drop in lake elevation creates, on average, $151.5 million in respiratory mortality costs in the Salton Sea counties…" (Jones, B.A. and Fleck, J. (2020). Shrinking lakes, air pollution, and human health: Evidence from California's Salton Sea. *Science of the Total Environment* 712(22):136490, http://dx.doi.org/10.1016/j.scitotenv.2019.136490.)

on impoundments constructed of contaminated sediments and filled with polluted wastewater.

b. Use of seawater for full Salton Sea restoration would permanently prevent the emission of dangerous fugitive dust from exposed lakebed. Instead of blowing throughout the surrounding area and chronically jeopardizing human health, the hazardous constituents in lakebed sediments would remain buried.

c. Implementation of a seawater importation plan would facilitate achieving sustainability of the Colorado River system. Such a plan would provide the restored Salton Sea with an enduring source of water independent of the Colorado River that will be immune to the future vagaries of climate change and the impacts of worsening aridification, and will be unaffected by cuts in Colorado River water allocations. If required pursuant to the Post-2026 Program, water rightsholders in the Salton Trough could substantially reduce their use of the Colorado River's water while not causing harm to the Salton Sea, to the lake's wildlife, or to public health.[142]

d. Because inexhaustible ocean water would be used as the restored Salton Sea's water supply, the lake would also be unaffected by other foreseeable circumstances that will substantially reduce future inflows of Colorado River wastewater into the central Salton Basin. For example, the Salton Sea would suffer no adverse impacts as a result of water-use efficiency improvements implemented by Colorado River stakeholders in the Salton Trough, or because of significantly increased recycling and reuse of Colorado River wastewater in the region, or due to entirely consumptive use of large quantities of Colorado River water by anticipated commercial-scale lithium extraction operations in the Salton Basin that will release no wastewater. In contrast, all of those scenarios could fatally undermine an in-basin restoration plan.

e. Using ocean water to accomplish full and permanent Salton Sea restoration would enhance the well-being of communities across the adjacent region, rather than subjecting them to a variety of serious and ongoing health hazards and significant socioeconomic harm.

f. Restoring the Salton Sea with ocean water and reestablishing the lake's ecological, biological, and biogeochemical functions would likely serve to sequester significant amounts of carbon in submerged lakebed sediments, and yield net-zero or net-negative GHG emissions. In contrast, in-basin restoration approaches would likely result in very large quantities of biogenic greenhouse gases being emitted on an ongoing basis, and would impose enormous economic costs related to the damaging climate impacts of those emissions.

VII.C. Interior and Reclamation must take action to ensure that an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea is expeditiously implemented

Implementation of Reclamation's Proposed Action in combination with failure to implement an appropriate, safe, effective, and sustainable long-term restoration plan for the Salton Sea will cause devastating impacts on people, fish and wildlife, the environment, and the climate. Many of the harmful impacts will be irreversible. Failure to implement an appropriate, safe, effective, and sustainable long-term restoration plan for the Salton Sea may occur because: (a) federal and state agencies adopt a no-action or piecemeal minimal-action approach regarding restoration, and no long-term plan for permanent restoration is carried

[142] Also, notably, the various proposed restoration plans involving desalination of seawater from the Gulf of California typically include substantial benefits for Mexico that could help offset the difficulties that country may experience due to future reductions in Colorado River water allocations.

out; or (b) an in-basin long-term plan is selected for implementation but it cannot operate as intended, is otherwise ineffective and/or unsafe, and/or it cannot be sustained over the long term. The problematic scenario (b) may materialize as a consequence of various foreseeable factors—including, but not limited to, the fundamental problem that there is a very high probability the Colorado River water supply necessary for operation of an in-basin plan will not exist in the future, and perhaps even the near future.

Therefore, I suggest it is incumbent on the Secretary of Interior—as Watermaster for the Lower Basin, and the head of the cabinet-level department in charge of, inter alia, management of federal lands and natural resources, stewardship of Tribal lands, and oversight of major agencies involved in and responsible for a panoply of Colorado River and Salton Sea issues—along with the Acting Commissioner of Reclamation, the head of the agency responsible for implementing management of the Colorado River's water, to urge the USACE (as well as the Salton Sea Authority and the California Department of Water Resources, the non-federal sponsors of the ISSS Study), not to move ahead with any long-term plan for Salton Sea restoration that is dependent on large amounts of Colorado River water continuing to flow into the central Salton Basin for decades to come. In doing so, the Secretary and the Acting Commissioner should emphasize that in light of the truly dire water shortage affecting the Colorado River, which is very likely to become even more severe in the coming years, to proceed with any in-basin plan for Salton Sea restoration that is dependent on Colorado River water would be to accept a very high risk that the project will fail because the water necessary to operate it will not exist. The devastating consequences of such a failure will be tantamount to having selected a no-action approach to the Salton Sea crisis, except that billions of dollars will have been wasted on attempting to implement a doomed project. The Secretary and Acting Commissioner should also urge the USACE to fully evaluate the feasibility of all reasonable options and proposals for using ocean water to accomplish permanent Salton Sea restoration. The evaluated options and proposals should include, but should not be limited to, proposals that were originally submitted to the U.C. Santa Cruz panel but were not included in the SSMP's Long-Range Plan because the U.C. Santa Cruz panel failed to evaluate them in a full, scientifically sound feasibility study, even though the panel was contractually required to do so. If the USACE does not have the requisite jurisdiction to properly accomplish this essential feasibility study of options and proposals to use ocean water to fully restore the Salton Sea, or is unable or unwilling to conduct it for other reasons, then Interior and Reclamation should promptly commence the necessary study and expedite it. If Interior and Reclamation do not currently have the legal authorities needed to do so, they should expeditiously obtain those authorities.

VIII. Failure to properly address Salton Sea issues and Salton Sea Impacts in the DEIS is counter-productive and short-sighted, and will adversely affect post-2026 management of the Colorado River

On June 6, 2025, during the Annual Colorado Law Conference on Natural Resources at the University of Colorado in Boulder, Scott Cameron—who was then the Acting Assistant Secretary for Water and Science in the Department of the Interior, but is now the Acting Commissioner of the Bureau of Reclamation—made clear Interior's and Reclamation's intention to omit from the DEIS any analysis of the Salton Sea crisis and Salton Sea Impacts.[143] A member of the audience asked Mr. Cameron, "In the post-2026 plan, how are we going to account for the fact reductions in IID's use of Colorado River water could reduce water in the Salton Sea?"[144] Mr. Cameron responded (emphasis added), "So that's a real, legitimate concern, and I know there's a lot of interest at the state level, and there are federal equities in terms of national wildlife refuges, you know, around the Salton Sea, and associated with IID project, of course. **The short answer is we are not directly taking on the Salton Sea as part of the NEPA process**, at least in terms of what you should expect to see in our Draft EIS alternatives. If the public comment period generates some issues regarding the Salton Sea that we think we

[143] A video recording of Mr. Cameron's statements in Session 5 of the conference is available online at: https://www.youtube.com/watch?v=lAmiWGzy85E&list=PLwFq2GL-i5UiQ1Gih81nnqhH0gR1eXVh7&index=5

[144] Id. at 17:59 to 18:16.

need to address, then we will address them. But, **quite frankly, we've got enough problems worrying about Lake Mead and Lake Powell than to try to figure out how to solve the Salton Sea at the same time.**"[145]

While Mr. Cameron's candor was appreciated, the choice by Reclamation and Interior to avoid considering the Salton Sea crisis and the Salton Sea Impacts of the Proposed Action when making decisions about post-2026 Colorado River management is insupportable under applicable law as explained above. Moreover, failing to address Salton Sea issues and Salton Sea Impacts that are directly related to post-2026 Colorado River management is both counter-productive and short-sighted with regard to the need for such management to sustain the river system and to support more than 40 million people and millions of acres of farmland reliant on the river.

In light of Acting Commissioner Cameron's background in both biology and natural resources economics, the details of the Salton Sea crisis and its consequences for fish, wildlife, the environment, and people must be clear to him. Certainly, he understands that IID cannot reduce Imperial County's use of Colorado River water without substantially worsening the Salton Sea's crisis and exacerbating the resulting harm to fish, wildlife, the environment, and people. The Acting Commissioner surely also understands that, in light of the nature and severity of the Colorado River's own water-scarcity crisis and the projections for worsening water shortages in the future, any proposed restoration plan for the Salton Sea that relies throughout the coming decades on continuing inflow of very large quantities of Colorado River water is unsustainable and untenable.

The use of inexhaustible ocean water to restore the Salton Sea, and to sever the tight linkage between IID's use of Colorado River water and the fate of the Salton Sea and its ecosystem, is the only approach that will actually solve the Salton Sea crisis and permanently avoid, or minimize and fully mitigate, the otherwise dire Salton Sea Impacts of the Proposed Action, *while simultaneously relieving tremendous pressure on the Colorado River system.* For example, if ocean water is used to restore the Salton Sea, IID could reclaim and reuse a substantial portion of the District's Colorado River wastewater for agriculture without causing devasting impacts on the Salton Sea. Such an approach could enable IID to reduce the amount of water the District draws directly from the river while also continuing to sustain the extremely important agricultural industry and associated economy in the Imperial Valley that supplies most of the vegetables consumed in the United States from late fall through spring.[146] But if a restoration plan for the Salton Sea that depends on continued inflow into the central Salton Basin of large quantities of Colorado River wastewater is the approach adopted by federal and state agencies, IID is highly unlikely to proceed with any water conservation measures involving recycling and reuse of a substantial portion of the District's wastewater (and is unlikely to proceed with any other water conservation actions, beyond the measures already undertaken, that substantially reduce the District's wastewater), because of the devastating impacts on the Salton Sea, fish and wildlife, and people throughout the surrounding region that would be the unavoidable consequences of such actions.

The Salton Sea crisis has resulted, inevitably, from construction and use of the 20th-century infrastructure that Reclamation utilizes to control the Colorado River and exhaustively distribute its water, and from implementation of Reclamation's 21st-century river-management decisions. In order to address both the Salton Sea crisis and the Colorado River crisis, it is necessary for Interior and Reclamation to consider carefully the ways in which the issues are intertwined, and to undertake an integrative approach that will actually solve the intractable problems involved. Continuing to resort to the use of Band-aids to postpone undertaking complex analyses and delay making difficult decisions is counter-productive, short-sighted, and unsustainable; and, in the long run, such a Band-aid approach will only serve to worsen the already severe problems affecting both the Salton Sea and the Colorado River.

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[145] Id. at 18:17 to 19:07.

[146] If Interior and Reclamation, and/or Colorado River water rights holders in other locations, were to fund the construction and operation of appropriate wastewater recycling facilities in Imperial County, conceivably IID might seriously consider reclaiming and reusing its wastewater in order to decrease the amount of Colorado River water the District draws directly from the river. However, please note that I do not speak for IID in any way.

IX. Conclusion and Recommendations

In the Post-2026 Program, Interior and Reclamation have a responsibility to manage the Colorado River system in ways that sustainably address the river's water-scarcity crisis. But, in doing so, those agencies must take into account the fact that for too long the Salton Sea ecosystem, the fish and wildlife dependent on it, and communities throughout the region surrounding the lake have improperly been an afterthought, or entirely ignored, in Colorado River management decisions; and they have therefore borne the brunt of many harmful consequences stemming from those decisions. That unjust, disproportionally injurious, and unlawful situation must not continue.

The DEIS does not satisfy applicable legal requirements. The Proposed Action will cumulatively and significantly exacerbate the harm that has already been inflicted on the Salton Sea and its ecosystem, fish and wildlife, the regional environment, the climate, and more than half a million people who live and work in areas adjacent to the lake—including Tribes to whom Interior and Reclamation owe federal Indian trust responsibilities. Yet the DEIS wrongly fails to evaluate the many foreseeable and significant Salton Sea Impacts of the Proposed Action, and also fails to suggest effective mechanisms for avoiding those impacts or for minimizing and fully mitigating the harm that is impossible to avoid. If Reclamation proceeds to implement the Proposed Action as the Post-2026 Program, and an appropriate, safe, effective, and sustainable plan for restoration of the Salton Sea ecosystem is not also implemented, there will be catastrophic and irreversible consequences for fish, wildlife, and people.

For all of the foregoing reasons, I respectfully suggest that Interior and Reclamation should promptly undertake the following essential actions:

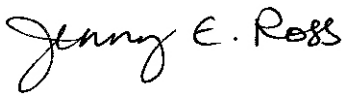
1. Formulate and issue a revised DEIS that:
    a. Includes the improperly omitted analyses of Salton Sea issues and Salton Sea Impacts, and identifies and commits to implementing effective measures to avoid, or minimize and fully mitigate, the harmful impacts of the Proposed Action on fish, wildlife, the regional environment, the climate, and people throughout the Salton Sea area, including but not limited to Tribes.
    b. Includes a detailed evaluation of Reclamation's options and the agency's preferred action alternative for addressing the foreseeable and potentially impending scenario in which one or both major mainstream reservoirs drop to critically low levels, the integrity of Reclamation's infrastructure is in imminent danger, the ability of that infrastructure to move water downstream to the Lower Basin states and Mexico is in jeopardy, and public health and safety are gravely threatened.
2. Immediately contact the USACE and engage in consultation and collaboration regarding options for implementing an appropriate, safe, effective, and sustainable plan for restoration of the Salton Sea ecosystem. Specifically, Interior and Reclamation should urgently discuss the following issues with the USACE:
    a. The water-supply crisis affecting the Colorado River is occurring because climate warming is adversely affecting the Basin's hydrology. The ongoing situation is genuinely dire and potentially catastrophic, and it is anticipated that Colorado River water scarcity will worsen considerably in the coming decades.
    b. If the ISSS Study recommends and proceeds to implement an in-basin project that is reliant on continued inflow of large quantities of Colorado River water, it is very likely that the project will not be sustainable—and foreseeably may fail in the near future—because the necessary water will not be available.
    c. A restoration plan for the Salton Sea and its ecosystem that utilizes ocean water importation instead of Colorado River water would: avert devastatingly harmful consequences for fish,

wildlife, and people that will otherwise occur because of the Proposed Action; potentially relieve substantial pressure on the Colorado River system by enabling Salton Trough water users to recycle and reuse their Colorado River wastewater; and facilitate successful implementation of the Post-2026 Program to protect and sustain the Colorado River and the infrastructure used to manage it, and to safeguard public health and safety.

3. Expeditiously obtain whatever legal authorities are necessary for Interior and Reclamation to proceed with implementation of an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea and its ecosystem that is not reliant on Colorado River water, and that will avoid or minimize and fully mitigate the harmful impacts of the Proposed Action, in the event that the USACE will not be proceeding with such a plan (either because of jurisdictional constraints or for other reasons).

Thank you for considering these comments.

Sincerely,



Jenny E. Ross, J.D.
Research Affiliate, Stout Research Center[147]

cc:

Gavin Newsom, Governor of California
Doug Burgum, Secretary of the U.S. Department of the Interior
Scott J. Cameron, Acting Commissioner of the Bureau of Reclamation
Alex Padilla, U.S. Senator for California
Adam Schiff, U.S. Senator for California
Wade Crowfoot, California Secretary for Natural Resources
Yana Garcia, California Secretary for Environmental Protection
Karla Nemeth, Director of the California Department of Water Resources
Raul Ruiz, M.D., U.S. Congressman for the 25th District of California
Steve Padilla, California State Senator, District 18
Jeff Gonzalez, California Assemblymember, District 36
Andrea Travnicek, Assistant Secretary for Water and Science, U.S. Department of the Interior
Joe Shea, Assistant Secretary for Salton Sea Policy, California Natural Resources Agency
Jeremy J. Brooks, Salton Sea Program Manager, Bureau of Reclamation
Susie Ming, USACE Project Manager, Imperial Streams Salton Sea Feasibility Study
Joaquin Esquivel, Chair of the California State Water Resources Control Board
G. Patrick O'Dowd, Executive Director/General Manager, Salton Sea Authority
Jessica Neuwerth, Executive Director, Colorado River Board of California
J.B. Hamby, Chair, Colorado River Board of California
James Newcomb, SSMP Lead and Assistant Deputy Director, California Dept. of Water Resources

[147] As a Research Affiliate of the Stout Research Center, I study a variety of scientific issues related to the Colorado River system, the Salton Trough, and the past, present, and future of the Salton Sea, including Pliocene-to-Holocene geology, paleontology, hydrology, climatology, and ecology. These comments are submitted in my personal capacity and not on behalf of the Stout Research Center.

Jenny E. Ross ♦ Research Affiliate, Stout Research Center ♦ Box 10037 ♦ Truckee, CA 96162 ♦ 1.530.414.1567

The Honorable Doug Burgum
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

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The Honorable Scott J. Cameron
Acting Commissioner
Bureau of Reclamation
1849 C Street, NW
Washington, D.C. 20240-0001
Mail Code: 91-00000

RE: Post-2026 Colorado River Management and the Salton Sea

March 5, 2026

Dear Secretary Burgum and Acting Commissioner Cameron:

I am writing to you in the hope that you will take a few minutes to carefully consider the crucial and urgent issues concerning the Colorado River and Salton Sea that I discuss in this letter and in my enclosed comments on the Draft EIS (DEIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (the Post-2026 Program). Although I submitted those formal comments to the Bureau of Reclamation in the manner required pursuant to the NEPA process, I am reaching out to you directly because only very high-level attention to these matters by you will successfully address them.

For many years my work has focused on objectively analyzing the many scientific, factual, legal, and policy issues that concern the past, present, and future of the Salton Sea and the Colorado River. My comments on the DEIS focus specifically on the significant harmful impacts that any effective Post-2026 Program to stabilize and sustain the Colorado River system will foreseeably have on the Salton Sea, the fish and wildlife reliant on the Salton Sea ecosystem, the environment, and the health and socioeconomic well-being of people throughout the surrounding region. Those harmful effects will be severe and essentially unmitigated, and they will undermine the ability of Interior and Reclamation to implement a successful Post-2026 Program to protect the Colorado River system. Therefore, as briefly described below and detailed more fully in the enclosed comments,[1] I respectfully suggest that it is essential for you to undertake specific additional actions on an urgent basis.

I explain the following issues in detail in the enclosed comments:

- More than 90% of the water sustaining the Salton Sea is Colorado River wastewater that derives from use of the river's water by the Imperial Irrigation District (IID), the Coachella Valley Water District (CVWD), and northwestern Mexico. IID is, by far, the primary source of Colorado River wastewater that enters the Salton Sea; about 85% of the water flowing into the lake comes directly from IID's use of Colorado River water, mostly for agriculture. Therefore, any Post-2026 Program implemented by Interior and Reclamation that results in substantially reduced use of Colorado River water by IID will have extremely harmful impacts on the Salton Sea, and consequently on the lake's ecosystem, fish and wildlife, the environment, and people throughout the surrounding region.

[1] Please note that my comments on the Draft EIS, and in this letter, are submitted in my personal capacity and not on behalf of the Stout Research Center.

- Because of the genuinely dire water-scarcity crisis confronting the Colorado River both currently and in the longer-term, it is entirely foreseeable that IID's (as well as CVWD's and Mexico's) use of Colorado River water will be significantly curtailed beyond the water-use reductions that have already been implemented pursuant to the Quantification Settlement Agreement (QSA) and other recent cutbacks approved by Interior and Reclamation. The harmful consequences of the additional water-use reductions for the Salton Sea, fish and wildlife, and people will be truly devastating.

- The DEIS assumes that the "10-Year Plan" being implemented by California's Salton Sea Management Program (SSMP), the SSMP's "Long-Range Plan," and the Imperial Streams and Salton Sea Aquatic Restoration Feasibility Study ("ISSS Study") being conducted by the U.S. Army Corps of Engineers (USACE), will collectively serve to avoid, or minimize and fully mitigate, the harmful consequences of the Post-2026 Program. But it is clear they will not. For the reasons described in my enclosed comments, the reality is that the actions of the SSMP and the USACE will be grossly inadequate—both temporally and substantively—to address the serious and ultimately irreparable harm that will result from the Post-2026 Program.

- It is essential that an appropriate, safe, effective, and sustainable plan for full and permanent restoration of the Salton Sea be developed expeditiously and implemented promptly. But that is not occurring.
    - The State's 10-Year Plan is a minimal band-aid, not a restoration plan. It was originally intended only to be an interim project to temporarily mitigate harm resulting from the QSA's water transfers while a full, long-term restoration plan was developed and implemented. Furthermore, the 10-Year Plan is not fully funded, and some of its primary planned projects have already been found to be infeasible following geotechnical analysis.
    - The State's Long-Range Plan is merely a presentation of various *options* for partial revitalization or restoration of the Salton Sea; it is not an action plan for implementation of any particular project. Moreover, it includes an inadequate and scientifically unsound analysis of the options presented.
    - Because of the USACE's major jurisdictional constraints and self-imposed subject-matter limitations, it has become apparent that the ISSS Study will yield a recommended project that will be both fundamentally ineffectual and unsustainable. It is highly likely that the USACE will seek to implement only a partial revitalization project for the Salton Sea, and that the project: (a) will be inadequate to address the Salton Sea's comprehensive and severe problems, and will not avoid or sufficiently mitigate the dreadful harm to fish, wildlife, and people that is occurring and will worsen because of the lake's continuing water-deprivation; and (b) will be entirely dependent on very large volumes of Colorado River water continuing to flow into the central Salton Basin for decades to come, and therefore will very likely fail completely because the water necessary to operate the project will be unavailable in the future (and potentially the near future).

- There has never been a comprehensive, scientifically sound, feasibility-level study of all potentially viable options to use ocean water importation to fully restore the Salton Sea. Such a study is urgently needed. Using inexhaustible ocean water to accomplish permanent restoration of the Salton Sea is the only approach that can address the terrible harm the Post-2026 Program will foreseeably inflict on the lake, its fish and wildlife, and more than half a million people throughout the surrounding region; and it is the only way to sever the untenable linkage between large-volume use of Colorado River water and sustenance of the Salton Sea. The necessary feasibility study has never been done by the SSMP, and it will not be accomplished by the USACE's work on the ISSS Study either. The USACE's major jurisdictional constraints and self-imposed subject-matter limitations will prevent the Corps from properly performing that crucial study.

In light of the foregoing issues, I therefore respectfully suggest it is essential for Interior and Reclamation to take the following crucial actions (and others specified in the enclosed comments) on an urgent basis:

1. Immediately contact the USACE and engage in consultation and collaboration regarding options for implementing an appropriate, safe, effective, and sustainable plan for restoration of the Salton Sea and its ecosystem. Specifically, Interior and Reclamation should discuss the following matters with the USACE:
    a. The water-supply crisis affecting the Colorado River is occurring because of adverse changes in the Basin's hydrology that are not temporary. The ongoing situation is genuinely dire and potentially catastrophic, and it is anticipated that water scarcity will worsen considerably in the coming years. Major water-use reductions by Colorado River rights holders will be necessary to address the crisis and sustainably manage the river system.
    b. If the ISSS Study recommends and proceeds to implement a project that is dependent on Colorado River water, it is extremely likely the project will not be sustainable—and in fact may fail completely in the near future—because the required water will not be available. Implementing an extremely costly project only to have it fail due to a lack of necessary water would cause catastrophic consequences.
    c. A restoration plan for the Salton Sea and its ecosystem that utilizes inexhaustible ocean water, instead of depending on exceedingly limited and over-allocated Colorado River water, would prevent or fully mitigate the disastrously harmful consequences for the Salton Sea, fish and wildlife, and people throughout the surrounding region that will otherwise occur because of the cutbacks in Colorado River water use that will be necessitated by the river's crisis. In addition, the use of ocean water to restore the Salton Sea would relieve substantial pressure on the Colorado River by enabling IID, CVWD, and Mexico to reclaim and reuse their Colorado River wastewater. Such an approach to restoration of the Salton Sea would greatly facilitate successful implementation of the Post-2026 Program to sustain the Colorado River system, and to protect public health and safety.
2. Expeditiously obtain whatever additional legal authorities are needed for Interior and Reclamation to take the lead in proceeding with implementation of an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea and its ecosystem that is not reliant on Colorado River water, and that will avoid or fully mitigate the harmful impacts of the Post-2026 Program, in the event that the USACE will not be proceeding with such a plan (either because of jurisdictional constraints or for other reasons).

Details relating to all of the above issues are in the enclosed comment letter. Please don't hesitate to contact me if you have any questions or would like to discuss these important matters further.

Sincerely,

Jenny E. Ross

Jenny E. Ross, J.D.
Research Affiliate, Stout Research Center[2]
jenny@jennyross.com

Enclosure: Comments on the Draft EIS for Post-2026 Operational Guidelines and Strategies – Jenny E. Ross

[2] As a Research Affiliate of the Stout Research Center, my work focuses on a variety of scientific issues related to the Colorado River system, the Salton Trough, and the past, present, and future of the Salton Sea, including geology, hydrology, climatology, and ecology.

To: The Bureau of Reclamation
crbpost2026@usbr.gov

RE: Comments on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for the Colorado River

March 2, 2026

To the Bureau of Reclamation:

I am writing to submit comments[1] on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (DEIS) publicly released by the Bureau of Reclamation (Reclamation or USBR) and the U.S. Department of the Interior (Interior) on January 9, 2026.[2] My comments are focused on issues related to the Salton Sea, and the failure of Reclamation to include in the DEIS the legally mandatory analysis of the cumulative and significant impacts on the Salton Sea, its ecosystem, the fish and wildlife reliant on that ecosystem, the regional environment, the climate, and people throughout the surrounding area—all of which impacts will foreseeably result from implementation of the post-2026 operational guidelines for management of the Colorado River (hereinafter "the Post-2026 Program").[3] I am providing considerable detail in these comments in order to help guide an appropriate analysis of those issues in a revised DEIS for the Post-2026 Program, which I suggest is essential for Interior and Reclamation to prepare expeditiously.

CONTENTS

I. **The DEIS fails to satisfy the urgent need for the Post-2026 Program, and does not comply with applicable law; therefore, a revised DEIS is required**

II. **Crucial context: The worsening Salton Sea crisis and the failure to remedy it**

III. **Reclamation is legally obligated to analyze the Salton Sea Impacts of the Proposed Action, and to commit to avoiding or minimizing and fully mitigating them, but has unjustifiably failed to do so in the DEIS**

IV. **Statements by Reclamation in the DEIS related to Salton Sea issues and Salton Sea Impacts are factually incorrect, misleading, and legally insupportable; and the agency's major omissions violate applicable law**

- A. **Statements in the DEIS related to Salton Sea inflows are incorrect and misleading**
- B. **Statements in the DEIS related to Reclamation's authority appear to be inaccurate**
- C. **Reclamation's reliance on the SSMP 10-Year Plan and USACE feasibility study to address Salton Sea Impacts of the Proposed Action is misguided**

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[1] Please note that I do not represent or speak on behalf of any interested individual, organization, company, or government entity. I submit these comments solely as a concerned citizen, and as someone who has spent many years objectively analyzing the scientific, factual, legal, and policy issues relating to the past, present, and future of the Salton Sea and the Colorado River.

[2] Available at: https://www.usbr.gov/ColoradoRiverBasin/post2026/draft-eis/index.html.

[3] Although Reclamation has primary responsibility for managing the Colorado River, I refer throughout these comments to both Interior and Reclamation to emphasize the role of the Interior Secretary and to emphasize that other agencies in the Department of the Interior in addition to Reclamation have important expertise and responsibilities relevant to Salton Sea issues.

D. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on air quality and public health in the Salton Sea region

E. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on fish and wildlife reliant on the Salton Sea ecosystem

F. The DEIS fails to analyze the Proposed Action's impacts on biogenic greenhouse gas emissions in the central Salton Basin and associated economic costs

V. The DEIS violates the federal Indian trust responsibilities of Interior and Reclamation

VI. Cumulative and significant harmful Salton Sea Impacts will foreseeably be devastating if Reclamation proceeds with the Proposed Action while failing to ensure those harmful consequences are avoided or minimized and fully mitigated

A. Summary of cumulative and significant Salton Sea Impacts that will greatly harm fish and wildlife, the regional environment, the climate, and people throughout the Salton Sea area

B. Reclamation cannot properly rely on the SSMP 10-Year Plan and the USACE's ISSS Study to address Salton Sea Impacts of the Proposed Action

1. The SSMP 10-Year Plan is insufficient for avoiding or mitigating the harmful impacts of the Proposed Action

2. The activities of the USACE related to the ISSS Study will not adequately address the harmful impacts of the Proposed Action

VII. To avert devastating consequences of the Proposed Action, permanent restoration of the Salton Sea is necessary

A. In-basin restoration options

B. Ocean water importation options

C. Interior and Reclamation must take action to ensure that an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea is expeditiously implemented

VIII. Failure to properly address the Salton Sea crisis and Salton Sea Impacts in the DEIS is counter-productive and short-sighted, and will adversely affect post-2026 management of the Colorado River

IX. Conclusion and Recommendations

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I. The DEIS fails to satisfy the urgent need for the Post-2026 Program, and does not comply with applicable law; therefore, a revised DEIS is required

The Colorado River, and the roughly 40 million people who depend on its water, are unquestionably teetering at the brink of catastrophe. Reservoirs are already at perilously low levels, and the effects of climate warming on the hydrology of the Colorado River Basin are reducing the river's streamflow to the point that Lake Powell may soon drop to a critical elevation that threatens the ability of Reclamation's infrastructure to safely move water downstream to serve even the basic health and safety needs of more than 25 million people in the United States and Mexico. If that foreseeable emergency scenario materializes, Glen Canyon Dam will face high risk of disastrous structural damage, and Interior and Reclamation will be obliged to drastically reduce allocations of water to the Lower Basin states and Mexico, a situation that will cause major injurious consequences for people across those regions and devastating harm to fish and wildlife.

The DEIS explains that the Post-2026 Program is necessary in large part because:
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> *The 2007 Interim Guidelines have not sufficiently reduced risk:* Based on operational experience since 2007, the current guidelines are not robust enough to manage the system 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.[4]

In addition, the DEIS explicitly recognizes that the Post-2026 Program must account for the fact that climate warming and associated aridification are adversely affecting the Colorado River Basin's hydrology, and are causing large and ongoing reductions in Colorado River streamflow that are projected to worsen substantially in the future:

> *Imbalance between water supply and demand will be exacerbated by increasingly likely low-runoff conditions:* The Basin is experiencing increased aridity due to climate variability, and long-term drought and low-runoff conditions are expected in the future. These conditions will exacerbate the now widely recognized imbalance between water supply and demand in the 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.[5]

Similarly, the DEIS states that the purposes of the proposed federal action include to "[p]rovide Colorado River water users a greater degree of predictability with respect to annual water availability in future years under anticipated increasing variability, low runoff, and low-reservoir conditions."[6]

Based on the inability of the Colorado River Basin states to reach an agreement among themselves regarding the details of the Post-2026 Program prior to the February 14, 2026 deadline set by Interior and Reclamation, it currently appears likely that Interior and Reclamation will be proceeding with the Basic Coordination alternative presented in the DEIS as the proposed federal action for the Post-2026 Program. Reclamation has stated the Basic Coordination alternative is the only action alternative that the agency has the authority to implement in the absence of agreement among all the Basin states.

However, the Basic Coordination alternative is insufficient to achieve the purposes of the Post-2026 Program because that alternative fails to meet key performance objectives in approximately 30% to 35% of Dry-year scenarios and approximately 40% to 75% of Critically Dry-year scenarios,[7] pursuant to the definitions of "Dry" and "Critically Dry" in the DEIS. In addition, Reclamation's modeling makes clear that none of the other alternatives evaluated in the DEIS—regardless of the severity of the water-use cutbacks they require—properly satisfies the need for the Post-2026 Program and performs well under all reasonably foreseeable hydrological conditions.[8] Reclamation has explicitly recognized that fact by publicly stating, "In Critically Dry periods, all alternatives have unacceptable performance."[9]

In formulating the Post-2026 Program, Interior and Reclamation must consider "the fact that 50% of the individual years of the 21st century (2000-2025) have been Dry or Critically Dry (including 2020, 2021, 2022, 2024, 2025) and only 27% of the years (including 2017, 2019, 2023) have been Moderately Wet or Wet…The *average flow* for the past six years (2020-2025) was 10.8 MAF/year, *less than the median reported*

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[4] DEIS, Executive Summary, section ES.1.1, page ES-4.

[5] DEIS, Executive Summary, section ES.1.1, page ES-4.

[6] DEIS, Executive Summary, section ES.1.1, page ES-5.

[7] DEIS, Executive Summary, Figure ES-5.

[8] DEIS, Executive Summary, Figure ES-5; DEIS, Ch. 3, Figures 3-8, 3-10, 3-13, 3-15.

[9] Statement by Carly Jerla, Reclamation EIS Coordinator, at the virtual public meeting on the DEIS, January 29, 2026.

for the Dry category."[10] Moreover, Interior and Reclamation must also account for the fact that scientific studies regarding the future impacts of climate warming on the Colorado River have projected that aridification will continue to cause major additional reductions in streamflow in the coming years. For example, a 2020 study found that by mid-century (2036-2065) Colorado River streamflow could decrease more than 30% in relation to the 1913-2017 mean, and potentially by as much as 40%.[11] Another recent study found that, estimated conservatively, Colorado River streamflow will shrink at least 20% more by mid-century than it has already, and 35% more by the end of the century; and potentially the river's flow could suffer even more significant declines of over 30% by mid-century and 55% by later in the century.[12]

Regardless of whether the Basic Coordination alternative, a different alternative presented in the DEIS, or another alternative not yet released to the public is ultimately adopted as Reclamation's preferred federal action for the Post-2026 Program, it is clear Salton Trough rights holders that are subject to the terms of that program—the Imperial Irrigation District (IID or the District) and the Coachella Valley Water District (CVWD)—will be called upon to reduce their use of the river's water, because such cutbacks will be necessitated by the dire water-shortage crisis affecting the Colorado River.[13] Therefore, **as used in these comments, the phrase "the Proposed Action" encompasses all potential action alternatives for the Post-2026 Program that Interior and Reclamation may adopt and that entail reductions in use of Colorado River water by Salton Trough rights holders, whether or not such action alternatives are presented in the current DEIS.**

It is clearly foreseeable both factually and scientifically that Reclamation's Proposed Action will have cumulative and significant harmful impacts on the Salton Sea, the Salton Sea ecosystem as defined by law,[14] fish and wildlife reliant on the Salton Sea ecosystem (including but not limited to species already designated as endangered and threatened under federal and state law), the regional environment, the climate, and more than half a million people throughout the surrounding area—including Tribes, to whom the federal government owes legally mandatory trust obligations. (When the foregoing impacts are referred to collectively in these comments, the phrase "Salton Sea Impacts" will be used for brevity.) Furthermore, and crucially, many of the injurious Salton Sea Impacts that are very likely to result from the Proposed Action will be devastating and irreversible.

Reclamation and Interior are obligated under the National Environmental Policy Act (NEPA) and other applicable law to fully evaluate the Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action, and to identify and implement measures that will serve to avoid, or effectively minimize and fully mitigate, those consequences. Compliance with those obligations is particularly crucial given the context in which the Post-2026 Program will be implemented—involving more than two decades of failures by responsible government agencies to restore the Salton Sea as statutorily mandated, or even to implement legally required mitigation of the harmful consequences of ongoing water transfers and other water-use reduction agreements instigated and approved by Interior and Reclamation. But despite their legal obligations, Interior and Reclamation have completely, summarily, and unjustifiably abdicated their duties in the DEIS, and have explicitly stated that "analysis of impacts on the Salton Sea is not included in this EIS."[15]

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[10] Comments on the DEIS submitted to Reclamation on February 27, 2026 by A.J Castle, J. Fleck, R.E. Kuhn, J.C. Schmidt, K. Sorenson, and K. Tara. Emphasis added.

[11] Milly, P.C.D. and Dunne, K.A. (2020). Colorado River flow dwindles as warming-driven loss of reflective snow energizes evaporation. *Science* 367(6483), 1252-1255, https://doi.org/10.1126/science.aay918.

[12] Udall, B. and Overpeck, J. (2017). The twenty-first century Colorado River hot drought and implications for the future. *Water Resources Research* 53, 2404–2418, https://doi.org/10.1002/2016WR019638.

[13] It is also clear that Mexico, the third Colorado River water user in the Salton Trough, will also be called upon to decrease use of the river's water pursuant to a legal process distinct from the Post-2026 Program.

[14] The Salton Sea ecosystem includes the lake and its lakebed, tributary streams and agricultural drains, associated riparian areas and wetlands, and farm fields in the IID service area. (California Fish & Game Code § 2931(d).)

[15] DEIS, Chapter 3, Section 3.2.7, page 3-22.

The primary focus of the DEIS should have been on evaluating in detail how the included alternatives perform during Dry and Critically Dry periods, as well as on developing and analyzing measures to avoid, or minimize and fully mitigate, the harmful consequences of implementing alternatives that do not perform satisfactorily in Dry and Critically Dry periods. The evaluated harmful consequences should have included the foreseeable, cumulative, and significant injurious impacts on the Salton Sea, its ecosystem, the fish and wildlife reliant on that ecosystem, the regional environment, the climate, and people throughout the Salton Sea area.

Because the necessary analyses were not included in the DEIS, it is necessary for Interior and Reclamation to prepare and issue a revised DEIS. The revised DEIS should present at least one action alternative that will meet all key performance objectives in Dry and Critically Dry years, and is within the existing legal authorities of Interior and Reclamation to implement in the absence of agreement among all Basin states. If the current legal authorities of Interior and Reclamation are not adequate to implement any alternative that will meet key performance objectives in Dry and Critically Dry years, the agencies should publicly explain what additional authorities are needed and should expeditiously obtain them.

Based on the information and analysis presented in the DEIS, along with other pertinent facts and science, for Interior and Reclamation to proceed with any Proposed Action entailing reduced Colorado River water use by Salton Trough rights holders, while neglecting to fully analyze the associated Salton Sea Impacts and failing to commit to avoiding, or effectively minimizing and fully mitigating, those impacts would be an arbitrary and capricious abuse of discretion that would violate applicable law, endanger the health and even the lives of more than half a million people including members of federally recognized Tribes, damage the environment and the climate, and jeopardize the continued survival of fish and wildlife populations, including species that are already at risk of extinction.

II. Crucial context: The worsening Salton Sea crisis and the failure to remedy it

It is not possible to analyze appropriately the significance of the Proposed Action's Salton Sea Impacts without fully accounting for the context in which the Proposed Action will occur. Most importantly, Reclamation is legally required to consider the nature and severity of the environmental, ecological, and public-health effects of previous and ongoing reductions in the inflow to the Salton Sea, the additive impacts of the new decreases, and the potential synergistically harmful interactions of the additional cutbacks with the existing ones. Reclamation has not properly accounted for these issues in the DEIS, and the agency's failure to do so violates federal law.

A fundamental misconception about the Salton Sea that insidiously affects much discussion of the lake's future is the widespread but erroneous belief that the lake is unnatural. This notion that the Salton Sea is a man-made body of water created accidentally at the beginning of the 20th century is both factually and scientifically wrong. Furthermore, the lake does not owe its existence to 20th-century Colorado River infrastructure, even though it is now dependent upon Colorado River wastewater. As I explained in a peer-reviewed scientific study published in 2020,[16] when the Colorado River flooded into the Salton Basin in 1905-1907, enhancing the size of a lake containing Colorado River water that already existed there,[17] the river was simply behaving in

[16] Ross, J.E. (2020). Formation of California's Salton Sea in 1905-07 was not "accidental." In: Miller, D.M. (Ed.), *Proceedings of the 2020 Desert Research Symposium*, Desert Symposium, Inc., pp. 217-230. (Available open-access online at: https://www.researchgate.net/publication/340038533_Formation_of_California's_Salton_Sea_in_1905-07_was_not_accidental.)

[17] See, e.g., Bailey, G. E. (1902). *The Saline Deposits of California*. California State Mining Bureau Bulletin No. 24. 187 pages. The frontispiece relief map of this 1902 book depicts the large lake that was present in the Salton Basin prior to the 1905-1907 flooding. The text on pages 122-124 discusses that lake and the salt harvesting operations adjacent to it, and a photograph at the top of page 123 shows the lake in the distance and the salt deposits in the foreground. Note that the lake was already known as the "Salton Sea" prior to the 1905-1907 flooding. A large body of evidence (some of which is summarized in Ross, 2020 supra) contradicts the common but misguided notion that the 1905-1907 floodwaters flowed into a dry basin that had not held a lake since "ancient" times.

the same manner it had for millions of years. Geologic evidence establishes that the northern Salton Trough, containing the Salton Basin in which the Salton Sea lies, became a natural part of the Colorado River's hydrologic system about five million years ago when the river first arrived at the Gulf of California.[18] As the river meandered throughout its delta region, which gradually became uniquely bifurcated into northern and southern lobes as the result of tectonic processes,[19] its waters flowed into the Salton Basin and sustained vast estuarine, deltaic, lacustrine, and other aquatic and wetland ecosystems. That important hydrologic connection between the Colorado River and the Salton Basin continued to exist for millions of years until the river was intentionally prevented from flowing into the Salton Basin anymore in the 20th century.

The Colorado River's natural hydrologic regime across its delta region, and the rich aquatic and wetland ecosystems in the Salton Basin—including enormous lakes—that the river created and supported, were abruptly altered forever when the river's route into the northern Salton Trough was deliberately and permanently blocked. Preventing the Colorado River from flowing naturally into the Salton Basin as it had done for millions of years—and as it continued to do on an ongoing basis through the early 20th century—was a primary motivating factor for the Boulder Canyon Project Act and the construction of Hoover Dam and other key infrastructure on the river.[20] That 20th-century water-management infrastructure enabled the Colorado River Basin states to develop in the manner they have during the past one-hundred years. But fully controlling the Colorado River, permanently severing its natural connection with the Salton Basin, and exhaustively exploiting the river's water also sealed the fate of the Salton Sea; the demise of the lake and the collapse of its ecosystem were assured without additional human intervention.

Ever since full control of the Colorado River was attained using Reclamation's infrastructure, the Salton Sea and its essential ecosystem have been reliant on very large quantities of Colorado River wastewater flowing into the central Salton Basin as a result of the use of the river's water by IID, CVWD, and Mexico. Because IID's Colorado River water entitlement is by far the largest among those users as a result of the District's very senior water rights, IID's use of the river's water is essential for sustaining the Salton Sea. Approximately 85% of the Salton Sea's inflow is wastewater that derives directly from Imperial County's use of Colorado River water in IID's service area.[21]

Despite intentional banishment of the Colorado River from its natural course into the Salton Basin, ongoing inflow of Colorado River wastewater into the basin throughout the 20th century and during the first portion of the 21st century enabled the Salton Sea to continue supporting millions of migratory and resident birds and hundreds of millions of fish, including threatened and endangered species. The Salton Sea is situated in a critical location for avian migration, at the juncture of the Pacific Flyway and the Intermountain West. Accordingly, more than 400 species of birds rely on the Salton Sea ecosystem—most, if not all, of them the same species that have used aquatic and wetland habitats in the Salton Basin for millions of years, as the

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[18] Crow, R.S. et al. (2021). Redefining the age of the lower Colorado River, southwestern United States. *Geology* 49(6):635-640, https://doi.org/10.1130/G48080.1. See also: Dorsey, R.J., et al. (2018). Punctuated Sediment Discharge during Early Pliocene Birth of the Colorado River: Evidence from Regional Stratigraphy, Sedimentology, and Paleontology. *Sedimentary Geology* 363:1-33, https://doi.org/10.1016/j.sedgeo.2017.09.018.

[19] Tectonic processes occurring at the boundary of the Pacific and North American plates, primarily manifested by movement along faults in the San Andreas fault system, caused the Colorado River's delta region to gradually transform from a typical fan shape into two hydrologically connected lobes that are now located to the north and south of the U.S.-Mexico border. The northern delta lobe in the northern Salton Trough contains the below-sea-level Salton Basin and Salton Sea, as well as the Imperial Valley; the southern delta lobe contains the Mexicali Valley and the subaerial delta region typically referred to as "the Colorado River delta," as well as the subaqueous delta at the head of the Gulf of California. See, e.g., Winker, C.D., and Kidwell, S.M. (1986). Paleocurrent evidence for lateral displacement of the Pliocene Colorado River delta by the San Andreas fault system, southeastern California. *Geology* 14:788-791.

[20] See, e.g., LaRue, E.C. (1925). *Water, Power and Flood Control of Colorado River below Green River, Utah.* Washington: Government Printing Office. 171 pages.

[21] California Natural Resources Agency (2025), Salton Sea Management Program 2025 Annual Report, p. 69. Annual data for 2024 indicate that 85.37% of the inflow to the Salton Sea derives from IID's use of Colorado River water. Updated annual data for 2025 are not yet available.

fossil record shows. Moreover, as lakes and wetlands across the western United States have withered since the 19th century, and many have vanished, the Salton Sea has transitioned from being ecologically important to being indispensable for the continued survival of numerous species.

As expanding development in the lower Colorado River Basin states increasingly tightened water supplies by the turn of the 21st century, California was pushed to adopt the multiparty 2003 Quantification Settlement Agreement (QSA) to ensure that the Golden State would not exceed its total annual allotment of 4.4 million acre-feet of Colorado River water. As required by the QSA and related water transfer agreements, and in accordance with the 2007 Colorado River Interim Operating Guidelines and additional voluntary agreements with Reclamation, since 2003 IID has conserved over 9.1 million acre-feet of Colorado River water that the District would otherwise have been legally entitled to use.[22] Pursuant to the QSA, IID will continue to transfer nearly 500,000 acre-feet of water annually to Southern California urban areas for decades to come. In order to conserve the volume necessary for the continuing QSA water transfers, IID has implemented various permanent water conservation measures (including, but not limited to, concrete lining of canals), and approximately 70% of irrigated farmland in IID's service area has been actively participating in the District's ongoing on-farm water-efficiency program designed to substantially decrease the amount of Colorado River water applied to agricultural fields in Imperial County.[23] Moreover, for 2025, IID received farmers' applications for 79.3% of the cropped acreage in the Imperial Valley to be included in the on-farm water-efficiency program.[24] Additionally, from 2023 through 2026, in collaboration with Imperial County farmers and with Reclamation's approval,[25] IID voluntarily undertook further measures to conserve more than 800,000 acre-feet of Colorado River water by implementing additional system conservation and deficit irrigation (partial fallowing) programs to help prop up the level of Lake Mead. Those additional IID water conservation programs implemented in 2023-2026 will add a grand total of 12 feet to Lake Mead's elevation.[26]

But as the amount of Colorado River wastewater flowing into the central Salton Basin shrinks, inevitably so does the Salton Sea. Thus, because of the major reductions in IID's use of Colorado River water mandated by the QSA and resulting from other recent water-use reductions approved by Reclamation, the Salton Sea is shriveling, its salinity is rapidly rising, the ecosystem is collapsing, and increasingly vast expanses of desiccated lakebed are polluting the air with hazardous dust containing toxic and carcinogenic components. Consequently, serious harm is occurring to fish and wildlife dependent on the Salton Sea ecosystem, and the health and economic well-being of more than half a million people living and working near the shrinking lake are in jeopardy.[27]

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[22] Pers. Comm. T. Shields, IID Water Department Manager, February 24, 2026. That provisional figure is for the amount conserved from 2003 through the end of 2025. When available, the final data will be posted at: https://www.iid.com/water/water-conservation.

[23] Draft Environmental Assessment of the IID 2024-2026 Temporary Colorado River System Water Conservation Project (Draft EA), pages 34 and 98.

[24] Pers. Comm. T. Shields, IID Water Department Manager, February 24, 2026.

[25] The relevant contracts between IID and Reclamation are: (a) the December 2023 System Conservation Implementation Agreement (2023 SCIA) between the United States and Imperial Irrigation District, and other related agreements, pertaining to Colorado River water conservation by IID during calendar year 2023; and (b) the August 2024 System Conservation Implementation Agreement (2024-2026 SCIA) between the United States and Imperial Irrigation District, and other related agreements, pertaining to Colorado River water conservation by IID during calendar years 2024-2026.

[26] Presentation by T. Shields, IID Water Manager, at the December 2025 Colorado River Water Users Association Annual Meeting, and pers. com. T. Shields, February 24, 2026.

[27] The following description of Salton Sea Impacts is not intended to be an exhaustive itemization of all the harmful effects on the Salton Sea ecosystem, fish and wildlife, the environment, the climate, and people throughout the surrounding region that are resulting from reductions in Salton Sea inflows and will be significantly exacerbated by the Proposed Action.

- Since the QSA water transfers started in 2003 (and primarily since those transfers ramped up rapidly in volume beginning in 2018), the area of the Salton Sea has decreased by approximately 65 square miles (41,800 acres), and the elevation of the lake's surface has dropped by nearly 15 feet.[28]
- Communities throughout the Salton Sea region, including but not limited to Tribes, are suffering significant, disproportionate, and unremedied negative effects on their health and socioeconomic well-being because of: (a) the QSA water transfers and additional recent Colorado River water cutbacks that have occurred pursuant to contracts between Reclamation and IID; (b) the resulting shrinkage of the Salton Sea, the ongoing collapse of the Salton Sea ecosystem, and the related deterioration of water quality in the lake, its tributaries, and associated wetlands and riparian areas; (c) pollution of the region's air by hazardous, toxic, and carcinogenic contaminants being emitted from exposed Salton Sea lakebed and the deteriorating lake itself; and (d) related impacts on the region's economy.
- Adverse impacts of freshwater deprivation on the Salton Sea, its tributaries, and associated wetlands and riparian areas are adversely affecting water quality and are impairing a variety of key biological systems necessary for supporting hundreds of species that depend on the Salton Sea ecosystem for essential aspects of their lives, including feeding and breeding.
- The salinity of the Salton Sea has risen so high—to a level more than double the salinity of ocean water—that the hundreds of millions of fish previously living there have been decimated, and they are now almost completely extirpated from the lake. Ongoing increases in salinity and other changes in water quality also threaten invertebrate populations that provide essential food for fish and birds dependent on the Salton Sea ecosystem—including species that are already endangered, threatened, or of special conservation concern under federal and state law.
- Degradation and loss of habitat in the Salton Sea ecosystem poses an existential threat to millions of migratory birds that have nowhere else to feed and recuperate in a vast arid region they must traverse twice-yearly during their long journeys. All of those birds are protected under the federal Migratory Bird Treaty Act and many of them are species designated as endangered, threatened, and/or of special conservation concern under federal and state law.
- Piscivorous birds reliant on the Salton Sea can no longer obtain sustenance that is crucial for their survival because the Salton Sea's fish population has crashed. The affected fish-eating bird species include, but are not limited to, Special Status Species such as the American white pelican (*Pelecanus erythrorhynchos*), the black skimmer (*Rynchops niger*), the gull-billed tern (*Gelochelidon nilotica*), the double-crested cormorant (*Nannopterum auritum*), and the wood stork (*Mycteria americana*); as well as Fully Protected Species in California such as the California brown pelican (*Pelecanus occidentalis californicus*).
- The shrinkage of the Salton Sea and the water quality problems in the lake, its tributaries, and associated wetlands and riparian areas are also jeopardizing the continued survival of other categories of bird species that are designated as endangered or threatened under federal and/or state law, or are otherwise designated as species of special conservation concern, and that are reliant on the Salton Sea ecosystem for essential habitat. Such species include, but are not limited to, the Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), which is a federally-listed endangered species wherever found, and a threatened and fully-protected species under California law; the California black rail (*Laterallus jamaicensis coturniculus*), which is listed as a threatened species in California, and as a Species of Management Concern federally; and the Western snowy plover (*Charadrius nivosus nivosus*), which is a Species of Special Concern wherever it occurs in California, and the coastal population of which is listed as Threatened under federal law.
- The Desert Pupfish (*Cyprinodon macularius*), an endangered species under both federal and state law that depends on the Salton Sea ecosystem as its most important remaining stronghold, is increasingly

[28] These numbers were current as of March 2, 2026. For newer figures, see the following webpage, which summarizes data from a variety of sources and is updated periodically: https://pacinst.org/current-information-salton-sea/.

imperiled as the QSA water transfers and additional Colorado River water cutbacks cause worsening habitat loss and degradation.[29]

- Vast areas of lakebed left exposed as the Salton Sea shrinks are releasing dangerous PM_{10} and $PM_{2.5}$ particulates that contain numerous toxic and carcinogenic components including, but not limited to, heavy metals and metalloids such as arsenic, lead, chromium, nickel, cadmium, and selenium; banned pesticides such as dichlorodiphenyltrichloroethane (DDT); polychlorinated biphenyls (PCBs); and hazardous microbial components, such as microcystins from harmful algae blooms. These readily-inhalable, airborne particles being emitted from the Salton Sea's exposed lakebed are dispersed by the wind throughout the surrounding region and are already seriously harming the health of people living and working adjacent to the lake.[30] Many of the contaminants have no safe level of exposure.
- As freshwater deprivation alters water chemistry and negatively impacts the Salton Sea ecosystem, blooms of toxic algae in the lake, its tributaries, along shorelines, and in associated wetlands and riparian areas are becoming more frequent and widespread, and proliferation of other potentially harmful microorganisms is also occurring. Toxins associated with algae blooms and other hazardous microbial materials are adversely affecting fish and wildlife, and are jeopardizing the health of people via multiple exposure pathways. These dangerous substances are making their way into fugitive dust and are also becoming entrained in tiny aerosol droplets emitted from water surfaces and spread by the wind. For example, bloom-forming cyanobacterial species produce microcystins that are hepatotoxins, neurotoxins, cytotoxins, and dermatoxins, and can cause or contribute to acute liver failure, liver cancer, kidney disease, acute neurotoxicity, other neurological and neurodegenerative diseases, gastrointestinal diseases, cardiovascular disorders, respiratory and dermal disorders, and reproductive toxicity.[31] In addition, recent research indicates windblown bacterial endotoxins originating in the deteriorating Salton Sea are a probable culprit in high rates of lung inflammation and asthma occurring in communities adjacent to the lake.[32] Another recent study found that the risk of respiratory-related hospitalizations in populated areas downwind of the Salton Sea increased by about 25% for each 10-microgram-per-cubic-meter increase in coarse particulate matter (PM_{10} and $PM_{2.5}$) coming from the lake during periods when algae blooms occurred.[33]
- Hydrogen sulfide irruptions from the Salton Sea are also worsening as water quality deteriorates and the lake's ecosystem collapses. Those releases of dangerous fumes are polluting the air in adjacent populated areas and consequently are causing significant symptoms such as headaches, nausea, dizziness, and shortness of breath, and are damaging the already-impaired quality of life for

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[29] The U.S. Fish & Wildlife Service is conducting a 5-Year Status Review for the desert pupfish (87 FR 5834).

[30] Guo, F. et al. (2025). Dust Events and Children's Lung Function Near a Drying Saline Lake. *American Journal of Respiratory and Critical Care Medicine* 211(11): 2133–2136, https://doi.org/10.1164/rccm.202504-0799RL. Miao, Y., et al. (2025). Source-specific acute cardio-respiratory effects of ambient coarse particulate matter exposure in California's Salton Sea region. *Environ. Res.: Health* 3: 015006, https://doi.org/10.1088/2752-5309/ad934a. Biddle, T.A. et al. (2023). Aerosolized aqueous dust extracts collected near a drying lake trigger acute neutrophilic pulmonary inflammation reminiscent of microbial innate immune ligands. *Science of the Total Environment* 858(3):159882, https://doi.org/10.1016/j.scitotenv.2022.159882. Farzan, S.F. et al. (2019). Assessment of Respiratory Health Symptoms and Asthma in Children near a Drying Saline Lake. *Int. J. Env. Res. Public Health*, 16(20): 3828, https://doi.org/10.3390/ijerph16203828. Johnson, J.E. et al. (2019). The Disappearing Salton Sea: A Critical Reflection on the Emerging Environmental Threat. *Science of the Total Environment* 663: 804, https://doi.org/10.1016/j.scitotenv.2019.01.365.

[31] Lad, A., et al. (2022). As We Drink and Breathe: Adverse Health Effects of Microcystins and Other Harmful Algal Bloom Toxins in the Liver, Gut, Lungs and Beyond. *Life*, 12(3): 418, https://doi.org/10.3390/life12030418. Hedrick, E., et al. (2025). Microcystin: From Blooms to Brain Toxicity. *J Cell Signal* 6(1):29-38, https://doi.org/10.33696/Signaling.6.131.

[32] Yisrael-Gayle, K., et al. (2025). Evidence for Aerosolized Environmental Bacterial Endotoxin as an Environmental Health Hazard. *medRxiv* 2025.10.02.25337178, https://doi.org/10.1101/2025.10.02.25337178.

[33] Miao, Y., et al. (2025). Source-specific acute cardio-respiratory effects of ambient coarse particulate matter exposure in California's Salton Sea region. *Environ. Res.: Health* 3: 015006, https://doi.org/10.1088/2752-5309/ad934a.

disadvantaged people across the Salton Sea region, including Tribes. For example, a recent study found that from 2013 through 2024 the Torres Martinez Indian Reservation adjacent to the Salton Sea experienced hazardous hydrogen sulfide levels that significantly exceeded state standards for more than 250 hours every August.[34]

- The exposed Salton Sea lakebed is also emitting large quantities of biogenic greenhouse gases (including carbon dioxide, methane, and nitrous oxide), thereby threatening to undermine California's greenhouse gas (GHG) emission-reduction goals and to worsen climate change.[35] The ongoing emissions of GHGs are also associated with very high economic costs.[36]

Since the QSA was adopted in 2003, IID has complied with the many onerous requirements imposed by the terms of that agreement, and the residents of Imperial County have shouldered significant related burdens. In addition, IID and Imperial County farmers have implemented large additional reductions in the use of Colorado River water annually since 2023. In contrast, however, the State of California has violated its legal obligations related to the Salton Sea for more than two decades. Despite explicit statutory mandates and other legal requirements, the State has failed to restore the Salton Sea, has not undertaken measures necessary to appropriately mitigate the injurious effects of the QSA water transfers, and has not protected fish, wildlife, or people from entirely foreseen harm caused by decline of the Salton Sea and the deterioration of its ecosystem. In particular, the State did not prevent and has not properly mitigated the collapse of the Salton Sea fishery, has done almost nothing to conserve the fish-eating birds that have been deprived of their essential food supply,[37] and has not ensured that the harmful impacts of the QSA on endangered and threatened species dependent on the Salton Sea ecosystem are minimized and fully mitigated as required by law. Furthermore, the State has failed to avert ongoing harm to people throughout the Salton Sea region being caused by hazardous, toxic, and carcinogenic substances being emitted from the exposed lakebed and from the lake itself and other associated waterbodies as the Salton Sea shrinks, its ecosystem deteriorates, and water quality degrades.

In 2014, because of the State's ongoing failure to satisfy its legal obligations, IID initiated a proceeding at California's State Water Resources Control Board (SWRCB or Water Board) that had the potential to jeopardize the continuation of the QSA water transfers to Southern California urban areas. Ultimately, as a result of that proceeding, in 2017 the California Natural Resources Agency (CNRA) developed and agreed to expeditiously implement a "10-Year Plan" for interim mitigation of harm resulting from the QSA, by promptly constructing habitat areas and implementing dust mitigation measures on exposed lakebed. The CNRA also explicitly committed to promptly complete a long-term plan for Salton Sea restoration (which it was already required to do by the 2003 Salton Sea Restoration Act). In 2017, Water Board Order WR 2017-

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[34] Centeno, D., et al. (2025). Hypereutrophication, hydrogen sulfide, and environmental injustices: Mechanisms and knowledge gaps at the Salton Sea. *GeoHealth*, 9: e2024GH001327, https://doi.org/10.1029/2024GH001327.

[35] See the following peer-reviewed scientific report and the references cited therein: Ross, J.E. (2022). Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans. Report submitted to the California Natural Resources Agency. January 27, 2022. 14 pages. https://doi.org/10.13140/RG.2.2.36775.62884. Also see that report's Supplementary Information, explaining the possible magnitude of the greenhouse gas emissions involved: https://doi.org/10.13140/RG.2.2.10089.36964. Numerous additional studies supporting the conclusions of the foregoing report and its supplementary information have been published since that report was prepared. In particular, see the following study focused on biogenic greenhouse gas emissions from the exposed lakebed of the Great Salt Lake: Cobo, M., et al. (2024). A desiccating saline lake bed is a significant source of anthropogenic greenhouse gas emissions. *One Earth* 7(8):1414-1423, https://doi.org/10.1016/j.oneear.2024.07.001.

[36] This issue is discussed further in Part IV.F. below.

[37] Approximately 2000 acres of the State of California's "Species Conservation Habitat" (SCH), a project under development for more than a decade, finally became operational in spring 2025. It currently consists of an impoundment built on a small portion of the Salton Sea's exposed lakebed that contains Colorado River wastewater blended with a smaller quantity of Salton Sea water, and it hosts fish to provide a source of food for piscivorous birds.

0134 (the Stipulated Order) set forth the relevant requirements,[38] and incorporated those requirements as conditions of the ongoing QSA water transfers. In particular, the Stipulated Order mandated that the CNRA achieve specific annual acreage milestones for habitat creation and dust suppression on the exposed lakebed during January 1, 2018 through December 31, 2028[39] (which is actually an 11-year period, not 10 years), "in addition to currently planned and funded habitat projects (Red Hill Bay, Torres Martinez wetlands and Species Conservation Habitat)."[40] The Stipulated Order further specified, "No less than 50% of the acreage…shall provide habitat benefits for fish and wildlife that depend on the Salton Sea ecosystem. Projects that provide habitat benefits for fish and wildlife do not include dust control projects that involve surface roughening, vegetation enhancement and surface stabilization."[41] In addition, the Stipulated Order required the CNRA to "complete a long-term plan" for Salton Sea restoration "no later than December 31, 2022." The CNRA agreed to all these requirements and has been legally bound by them since 2017.

Nonetheless, the CNRA has continuously violated the requirements of the Stipulated Order since 2017. The CNRA did not "complete a long-term plan" for Salton Sea restoration by December 31, 2022; instead, in 2023 the agency's Salton Sea Management Program (SSMP) belatedly released an inadequate, deeply flawed, and scientifically unsound Draft Long-Range Plan[42] that was essentially just a rehashed presentation of suggested *options* for restoration that have been discussed but not acted upon for decades. That "plan" was not finalized until spring 2024, and its fundamental defects were not cured.[43] In addition, in every year since 2017 the CNRA has failed to comply with the mandatory acreage requirements for habitat creation and dust suppression at the Salton Sea imposed by the Water Board. For example, by the end of 2024 the CNRA was required to have created a grand total of 14,200 acres of habitat and dust mitigation measures, and at least 50% of that acreage (at least 7,100 acres) was required to be functional habitat. But, in reality, the grand total amount of habitat created by the CNRA through the end of 2024 was only 347 acres (just 4.89% of the habitat acreage required to have been created by then), and the agency had implemented "interim" and "completed" dust mitigation measures on a total of only 1302 acres (just 18.34% of the required dust suppression acreage). Although the 2026 SSMP Annual Report to the SWRCB—which will present data for habitat and dust mitigation acreage completed during 2025—has not yet been released, the SSMP's online Project Tracker indicates unofficially and provisionally that a grand total of 2,357 acres of habitat and a grand total of 2,425 acres of "interim" and "completed" dust mitigation measures were constructed from 2018 through the end of 2025.[44] This means that although the total amount of functional habitat mandated to be created by the CNRA during 2018-2028 is a minimum of 14,900 acres, currently—**eight years through the 2018-2028 period to which the Stipulated Order applies—the State has created only 15.8% of the required amount of habitat** (assuming the unofficial figures in the SSMP online Project Tracker are correct). Similarly, although the grand total amount of dust-suppression acreage mandated to be constructed by the CNRA during 2018-2028 is at least 14,900 acres, **the State has created only 16.4% of the required amount of dust mitigation**

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[38] The specific requirements are set forth in Exhibit A of the Stipulated Order.

[39] Exhibit A to the Stipulated Order, pages 2-3, paragraph 24.

[40] Exhibit A to the Stipulated Order, page 2, paragraph 24. Importantly, the Red Hill Bay and Torres Martinez wetlands projects that were stated as ones "currently planned and funded," were never constructed. A portion of the Species Conservation Habitat, also specified in 2017 as "currently planned and funded" and explicitly excluded from being counted toward the acreage requirements mandated by the Stipulated Order, finally became operational in 2025.

[41] Exhibit A to the Stipulated Order, page 3, paragraph 25.

[42] My detailed public comments on the 2023 SSMP Draft Long-Range Plan are available at: https://doi.org/10.13140/RG.2.2.33676.37768.

[43] The SSMP's Final Long-Range Plan was released on March 15, 2024; a revised version was released on April 22, 2024. https://saltonsea.ca.gov/planning/ Only the Executive Summary is publicly available on the SSMP website. In order to obtain a full copy of the Final Long-Range Plan and all appendices, it is necessary to write to the CNRA and request that they be provided.

[44] See https://projects.saltonsea.ca.gov/Results/ProgressDashboard#fishAndWildlifeHabitat and https://projects.saltonsea.ca.gov/Results/ProgressDashboard#dustSuppression. The official data for calendar year 2025 will not be available until the 2026 SSMP Annual Report to the SWRCB is publicly released in spring 2026.

acreage (again assuming the unofficial online figures are correct), and only if "interim dust suppression" measures are included in the total. In addition, the Species Conservation Habitat project that the Stipulated Order stated was planned and funded as of 2017 and was therefore explicitly excluded from being counted toward fulfillment of the Order's acreage requirements, is nonetheless being counted by the State toward fulfillment of the acreage requirements and represents all of the habitat acreage created by the SSMP so far. Moreover, the SSMP's Red Hill Bay and Torres Martinez wetlands habitat projects that the Stipulated Order also stated were planned and funded as of 2017 were never constructed.

As discussed further in Part VI.B.1. below, it is not clear whether the remainder of the 10-Year Plan's projects will actually be built, and—even assuming they are constructed—it is also unclear whether they will operate as intended, in a safe and effective manner, and whether they will be sustainable.

Beginning in 2023, the U.S. Army Corps of Engineers (the USACE or the Corps) took over from the State the task of evaluating potential restoration approaches to achieve long-term revitalization or restoration of the Salton Sea ecosystem. For that purpose, as further discussed in Part VI.B.2. below, the USACE is currently conducting a multi-year feasibility study of partial revitalization and full restoration options, entitled the Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study (ISSS Study). Unfortunately, however, the Corps has "adopted" and is "relying on"[45] the SSMP's inadequate and seriously defective Long-Range Plan, as well as the biased, scientifically unsound, and fatally flawed findings of the U.C. Santa Cruz panel[46] that was previously hired by the State of California to conduct a full feasibility study of ocean water importation options to restore the Salton Sea but that failed to perform the necessary work.[47] In addition, the USACE study is not fully funded, and the Corps appears to be fundamentally hampered in its ability to properly conduct the study because of major jurisdictional limitations. As the Salton Sea Authority—a non-federal co-sponsor of the ISSS Study—explained in its February 27, 2026 comments to Reclamation on the DEIS, those jurisdictional constraints include, but are not limited to, the following: "Corps policy does not permit the Corps to undertake projects on federal lands, nor does policy permit the Corps to count [in the benefit-cost analysis required to be conducted as part of the ISSS Study] the benefits of the [alternative actions evaluated in the] Feasibility Study provided to federal lands. Moreover, the Corps is also limited in its ability fully value the public health benefits of this work."[48] In addition, the Corps has publicly acknowledged that addressing water quality problems is not within the scope of the USACE's authority, and the ISSS Study will not specifically address those problems.[49] It is therefore unclear what sort of revitalization or restoration project the USACE study may ultimately recommend, and it also remains unclear whether that project will be approved and funded by Congress, whether it will be built, and whether it will actually be effective in addressing any of the harmful Salton Sea Impacts that are currently ongoing and that will worsen significantly in the future if Reclamation's Proposed Action is implemented.

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[45] Statements by Corrie Stetzel, USACE Water Resources Planner, during the November 20, 2025 Salton Sea Authority Board Meeting, agenda item IV.C. A video of the Board meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. Ms. Stetzel's presentation and comments begin at 25:50 in the video.

[46] In the video for which a link is provided supra in footnote 45, Ms. Stetzel refers to the U.C. Santa Cruz panel as "the independent review panel." Video of November 20, 2025 Salton Sea Authority Board Meeting, at 49:15 to 50:07.

[47] The serious problems affecting the State's Long-Range Plan and the U.C. Santa Cruz panel's contract, process, findings, and conclusions are analyzed in detail in my public comments on the Draft SSMP Long-Range Plan (available at https://doi.org/10.13140/RG.2.2.33676.37768) and my public comments on the work of the U.C. Santa Cruz panel (available at https://doi.org/10.13140/RG.2.2.30320.93448) that were submitted to both the State and the Corps in 2023.

[48] Salton Sea Authority (February 27, 2026). Public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, page 8. Available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf.

[49] Corrie Stetzel, USACE Water Resources Planner for the ISSS Study, stated during the November 20, 2025 Salton Sea Authority Board Meeting, "...we don't normally work in water quality; that falls under the authority of the Environmental Protection Agency... it's not part of our, directly part of our Army Corps of Engineers mission, unfortunately. So, we won't be formulating for that parameter specifically." A video of the Board meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. The quoted comments are at 48:21 to 49:14 in the video.

While the CNRA continues its chronic failure to comply with crucial legal mandates, and the USACE proceeds with a feasibility study that is incompletely funded, handicapped by jurisdictional constraints, and relies on the SSMP's inadequate and scientifically unsound Long-Range Plan and the U.C. Santa Cruz panel's biased and fatally flawed findings, the harmful impacts of the Salton Sea's freshwater deprivation are worsening and will continue to do so. The Salton Sea is shrinking ever more rapidly as IID's use of Colorado River water continues to decrease pursuant to the QSA and because of the District's further water conservation measures instigated and approved by Interior and Reclamation; the lake's salinity is rising at an accelerating pace, and is already more than twice the salinity of the ocean; increasingly large areas of exposed lakebed are emitting hazardous, toxic, and carcinogenic substances and greenhouse gases; the water quality in the lake, its tributaries, and associated wetlands is rapidly deteriorating; the survival of fish and wildlife dependent on the Salton Sea ecosystem, including endangered and threatened species, is increasingly in jeopardy; and people across the surrounding region are being subjected to grave harm that is potentially irreversible. And now, because of the Colorado River's genuine crisis, the Proposed Action will foreseeably deprive the Salton Sea ecosystem of even more water, and will substantially exacerbate the harm to fish and wildlife, the environment, the climate, Tribes, and other disadvantaged communities throughout the Salton Sea region that is already ongoing.

III. Reclamation is legally obligated to analyze the Salton Sea Impacts of the Proposed Action, and to commit to avoiding or minimizing and fully mitigating them, but has unjustifiably failed to do so in the DEIS

Any action alternative for managing the Colorado River in the Post-2026 Program that reduces water use by Salton Trough rights holders will necessarily exacerbate significantly the injurious impacts of freshwater deprivation that are already affecting the Salton Sea and its ecosystem, the remaining fish including an endangered species, hundreds of bird species including ones that are listed as endangered or threatened, the regional environment, the climate, and the health and socioeconomic well-being of more than half a million people throughout the surrounding area. In compliance with the National Environmental Policy Act (NEPA),[50] the NEPA implementing regulations,[51] associated case law, and other applicable law, Interior and Reclamation are legally obligated to fully analyze these issues in the EIS for the Proposed Action, and to identify and commit to implementing measures that will avoid, or minimize and fully mitigate to the greatest feasible extent, the cumulative and significant Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action. Nonetheless, the DEIS unjustifiably fails to address these issues. In addition, the Proposed Action must comply with other applicable laws, including but not limited to the requirements of the Clean Air Act,[52] the Endangered Species Act,[53] and the Migratory Bird Treaty Act,[54] as well as associated rules, regulations, and case law.[55]

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[50] Pub. L. 91–190, 42 U.S.C. 4321 et seq.

[51] National Environmental Policy Act Implementing Regulations (May 20, 2022). 40 CFR Parts 1500-1508.

[52] 42 U.S.C. §§ 7401–7671q.

[53] 16 U.S.C. §§ 1531–1544.

[54] 16 U.S.C. §§ 703-712.

[55] Furthermore, Interior is also legally obligated to comply with all relevant laws that are applicable to the very large portions of land adjacent to and beneath the Salton Sea that are owned and/or managed by Interior and agencies within that Department, including Reclamation, the Bureau of Land Management, and the U.S. Fish & Wildlife Service. (See https://www.usbr.gov/lc/region/programs/SaltonSeaProjectsMap.pdf.) As Interior and Reclamation know, foreseeably the Proposed Action will have harmful consequences that will cause those lands to violate applicable laws, including but not limited to the Clean Air Act and its implementing rules and regulations. For example, see the Addendum to the August 31, 2016 Memorandum of Understanding By and Between the U.S. Department of the Interior and the State of California Natural Resources Agency Regarding the Coordination of Activities to Manage the Salton Sea (signed by Interior Jan. 17, 2017), which provided, "...Parties will comply with all applicable requirements of the Federal Clean Air Act and all implementing rules and regulations in connection with potential air quality emissions from Salton Sea

The NEPA implementing regulations define 'cumulative impacts' of a proposed federal action as:

> "...the impact on the environment 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.** Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."[56]

Reclamation acknowledged the nature of cumulative impacts in the 2024 Final SEIS for Near-Term Colorado River Operations:

> ...cumulative impacts refer to two or more individual impacts that, when considered together, are significant or that compound or increase other environmental impacts. Cumulative impacts can be categorized as additive and interactive. An additive impact results from additions from one kind of source through either time or space. An interactive impact results from more than one kind of source.[57]

In addition to evaluating whether the harmful effects of the Proposed Action are cumulative, Reclamation was required by law to analyze whether the negative effects will be significant. The NEPA implementing regulations state:

> **"In considering whether an adverse effect of the proposed action is significant, agencies shall examine both the *context* of the action and the *intensity* of the effect."**[58]

For the analysis of "context," agencies are directed to consider "the characteristics of the geographic area, such as **proximity to unique or sensitive resources or communities with environmental justice concerns**,"[59] and also "**the potential global, national, regional, and local contexts** as well as **the duration, including short-and long-term effects**."[60]

For the analysis of "intensity," the NEPA implementing regulations state in part:[61]

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playa lands owned or managed by the Parties that are exposed as a result of decline in elevation of the Salton Sea." https://www.doi.gov/sites/doi.gov/files/uploads/signed_addendum_connor_salton_sea.pdf. Interior and Reclamation also know that very costly mitigation measures will be required to be implemented on the lands they own and manage in order to mitigate the harmful air quality impacts of reduced inflows to the Salton Sea. For example, Reclamation explicitly acknowledged the need for mitigation and the high costs involved in the agency's FY 2021 Official Budget Justifications. That document states: "Reclamation estimates that approximately 8.75 square miles of Reclamation-owned lands will be emergent from the Sea as it recedes over the next 10 years. Even using extremely conservative estimates related to the costs at Owens Lake, Reclamation may still have significant air quality mitigation costs related to any applicable Clean Air Act requirements as the Sea recedes." (Pages 41-42.) In the same document (at page 41), Reclamation specifies the costs at Owens Lake for mitigating particulate pollution as: "...air quality mitigation establishment costs at approximately $38 million per square mile (averaged over all types of mitigation) and annual maintenance costs of approximately $500,000 per square mile." Applying those numbers to the 8.75 square miles of Reclamation-owned lands at the Salton Sea yields a minimum cost of $332.5 million for establishing air quality mitigation measures, and an annual operations and maintenance cost of at least $4.375 million.

[56] 40 CFR 1508.7, emphasis added.

[57] Final SEIS for Near-Term Colorado River Operations, page 3-10.

[58] 40 CFR 1501.3(d), bold emphasis and italics added.

[59] 40 CFR 1501.3(d)(1), emphasis added.

[60] Ibid., emphasis added.

[61] 40 CFR 1501.3(d)(2), emphasis added.

> ...**Agencies shall analyze the intensity of effects considering the following factors,** as applicable to the proposed action and in relationship to one another:
>
> (i) The degree to which the action **may adversely affect public health and safety**.
> (ii) The degree to which the action **may adversely affect** unique characteristics of the geographic area such as...**ecologically critical areas**.
> (iii) Whether the action **may violate relevant Federal, State, Tribal, or local laws** or other requirements **or be inconsistent with Federal, State, Tribal, or local policies designed for the protection of the environment**.
> .....
> (vi) The degree to which the action **may adversely affect an endangered or threatened species or its habitat**, including habitat that has been determined to be critical under the Endangered Species Act of 1973.
> (vii) The degree to which the action **may adversely affect communities with environmental justice concerns**.
> (viii) The degree to which the action **may adversely affect rights of Tribal Nations** that have been reserved through treaties, statutes, or Executive Orders.

In evaluating the significance of the reasonably foreseeable adverse impacts of the Proposed Action, Reclamation was required in part to consider various key aspects of the context in which the Proposed Action will occur. Critical to the Proposed Action's context is the comprehensive, two-decade-long failure by the State of California to comply with legal mandates to restore the Salton Sea and to avoid or minimize and fully mitigate the harmful effects of the QSA water transfers on fish, wildlife, the environment, and people. This ongoing violation of legal requirements has had and continues to have significant and harmful Salton Sea Impacts. Moreover, the extent of those impacts was not anticipated in the EIR/EIS for the QSA because no one expected that the State of California would violate its legal obligations throughout the past two decades.[62] Reclamation should have considered that crucial context in the DEIS, but did not.

Concerning the "intensity" of effects foreseeably resulting from Reclamation's Proposed Action, there is no reasonable doubt that it will cause a variety of significant cumulative impacts that include ones explicitly enumerated in the NEPA implementing regulations as factors affecting the intensity of an agency's contemplated action, as quoted above. It is also clear that the consequences of the Proposed Action will interact with and compound the environmental, ecological, and human-health impacts of the QSA water transfers and the additional recent cutbacks in Colorado River water use by IID during 2023-2026 that were approved by Reclamation, including the unmitigated adverse impacts resulting from the State of California's failure to comply with its legal obligations relating to the Salton Sea for more than twenty years.

The Proposed Action will foreseeably result in large additional reductions in Colorado River water use by IID, beyond the cutbacks already occurring because of the QSA and the 2023 and 2024-2026 SCIAs, and those additional reductions may be ongoing over the course of many years. It is clear such additional reductions in IID's Colorado River water use will significantly reduce Salton Sea inflow and greatly worsen the dreadful consequences for people, fish and wildlife, the regional environment, and the climate that are already occurring as a result of the Salton Sea's ongoing freshwater deprivation, and that have been inadequately addressed for many years by the responsible government agencies.[63]

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[62] In light of the State of California's egregious and ongoing violation of its legal obligations for more than twenty years, and considering the significant harm that has been occurring as a result of that unexpected and chronic violation of law, arguably a Supplemental EIS process concerning the QSA water transfers should have been initiated previously pursuant to 40 CFR Part 1502.9(d)(1)(ii).

[63] The Proposed Action will also cause foreseeable and significant adverse impacts on recreation, cultural resources including Tribal cultural resources, visual resources, paleontological resources, and socioeconomics throughout the Salton Sea region. See my public comments on the 2024 Draft SEIS for Near-Term Colorado River Operations: https://www.usbr.gov/ColoradoRiverBasin/documents/NearTermColoradoRiverOperations/PublicComments/Organizations/557_Stout%20Research%20Center_508.pdf

Despite the fact that the Proposed Action will foreseeably have cumulative and significant harmful consequences throughout the Salton Sea region, including but not limited to ones that are likely to violate the Clean Air Act, the Endangered Species Act, and the Migratory Bird Treaty Act, and associated rules, regulations, and case law, the DEIS completely fails to address the relevant issues.[64] Instead, Reclamation states, "While any resultant impacts on the Salton Sea may be accelerated by Post-2026 policies, the overall magnitude of impacts would not change."[65] Essentially, Reclamation is claiming that harmful Salton Sea Impacts resulting from the Proposed Action will not be cumulative or significant as those concepts are defined under applicable law, because the QSA water transfers will cause the same effects decades from now. This claim is unjustified, unreasonable, and legally untenable.

By alleging that the Proposed Action will not result in additional or cumulative harm beyond the consequences that the QSA will cause, Reclamation is essentially saying that the ongoing QSA water transfers will eventually destroy the Salton Sea, expose most of its lakebed, and cause devastating and irreversible harm to fish, wildlife, and people anyhow, so overall it doesn't matter that the Proposed Action will substantially expedite the demise of the Salton Sea and its ecosystem; significantly increase the amount of exposed lakebed emitting large quantities of hazardous, toxic, and carcinogenic particulates, including substances for which there is no safe level of exposure; cause dreadful impacts on people, including additional debilitating disease and even death; imperil the continued survival of endangered and threatened species, and hundreds of other species dependent on the Salton Sea ecosystem; and continue to cause all of this harm for many years.[66] That is an insupportable claim, both legally and morally. If Mr. X were to strangle Mr. Y to death and then declare that his action caused no additional harm to Mr. Y because Mr. Y would have died eventually anyhow (as we all will), that assertion would obviously be ludicrous and legally indefensible. Reclamation's claim in the DEIS is no less ludicrous and indefensible.

The Proposed Action is likely to reduce Salton Sea inflows by a minimum of hundreds of thousands of acre-feet annually, and potentially far more, in addition to the very large amount by which inflows are already reduced because of the QSA water transfers. Those additional reductions will rapidly expose vast areas of lakebed. For example, modeling for the Final SEIS for Near-Term Colorado River Management determined that reductions in use of Colorado River water by Salton Trough rights holders during 2024-2026 would cause the exposure of up to 35,594 acres of lakebed through 2026.[67] Furthermore, that modeled amount of exposed lakebed did not account for the effects of 10-Year Plan projects, including the Species Conservation Habitat project, or for consumption of water by emergent vegetation and actively planted vegetation on the exposed lakebed; if the modeling had done so, the amount of exposed lakebed resulting from reduced inflow into the Salton Sea would have been larger. Even if annual decreases in Salton Sea inflows pursuant to the current Proposed Action are comparable to and not more voluminous than the ones occurring during 2024-2026 pursuant to the Final SEIS for Near-Term Colorado River Management, the additional inflow reductions beginning in 2027 will cause much more expansive areas of lakebed to be exposed because they will very likely be sustained across a longer period of time. Moreover, the amount of lakebed to be exposed will be

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[64] Reclamation could not have been genuinely unaware of the fact that the reductions in use of Colorado River water by Salton Trough water users that will foreseeably be necessitated by the Proposed Action will result in significant harmful impacts (consistent with the definition of "significance" under applicable law, including but not limited to 40 CFR Part 1501.3(d)) on the Salton Sea and its ecosystem, fish and wildlife reliant on that ecosystem, the regional environment, the climate, and the health, safety, and socioeconomic well-being of people throughout the surrounding area. At a bare minimum, my detailed scoping coming for the Post-2026 Program in August 2023, as well as my public comments on Reclamation's Revised Draft SEIS for Near-Term Colorado River Operations in December 2023, provided clear notice to the agency that additional cutbacks in IID's use of Colorado River water would indeed cause significant adverse impacts of those types, and would require an appropriate analysis in any related EIS. Public comments by others also provided such notice to Reclamation.

[65] DEIS, Chapter 3, section 3.2.7, page 3-24.

[66] Although the period during which the Proposed Action will be in effect is not yet known, presumably the time-frame will be at least 5 years and potentially much longer.

[67] Final SEIS for Near-Term Colorado River Management, page 3-146.

even greater because of water consumption by additional components of the 10-Year Plan and other factors. Thus, it is foreseeable that very large additional expanses of lakebed—far beyond the area projected to be exposed because of the QSA—will become exposed annually as a result of the Proposed Action, and that exposure will be ongoing over the course of many years, and even for decades. In fact, as a result of the Proposed Action the Salton Sea is likely to be reduced to a relatively small and extraordinarily hypersaline brine sink that cannot support any living thing other than halophilic bacteria, viruses, and other microorganisms, many of which will pose serious risks of harm to wildlife and people.

It is foreseeable that the additional areas of lakebed to be exposed as a result of the Proposed Action will emit dangerous particulates containing hazardous, toxic, and carcinogenic constituents into the region's air, and the readily-inhalable pollutants will have significant harmful effects on public health in the adjacent populated areas, including injurious impacts on Tribes and other environmental justice communities, that will compound the detrimental effects of the twenty-year failure by government officials to remedy the consequences of the QSA. Many of the dangerous substances involved have no safe level of exposure. Thus, it is foreseeable that the Proposed Action will cause people throughout the Salton Sea region to suffer substantially worsened morbidity and mortality for many years. That dire and irreversible harm is not rendered inconsequential because the QSA water transfers conceivably *might* ultimately cause the same impacts decades from now.

The Proposed Action will also reduce the quantities of water in Salton Sea tributaries and associated wetlands and riparian areas, substantially increase the lake's salinity and have other adverse impacts on water quality, and will thereby jeopardize the survival of fish and wildlife dependent on the Salton Sea ecosystem. It is foreseeable that many fish and birds—including ones that are already endangered and threatened, as well as other Special Status Species—will be killed, and even completely extirpated or pushed entirely to extinction, as a result of the substantial, ongoing reductions in freshwater inflows that will foreseeably occur pursuant to the Proposed Action. That major and irreversible harm is not rendered inconsequential because the QSA water transfers conceivably *might* someday cause the Salton Sea ecosystem to collapse fully and all the fish and wildlife reliant on it to disappear eventually.

The assertion by Reclamation in the DEIS that the harm to be caused by the Proposed Action is not cumulative or significant because it will happen eventually anyhow due to the QSA is specious for another reason as well: The allegedly inevitable long-term harm will not actually occur if government officials comply with their legal obligations to restore the Salton Sea. As noted earlier, to combat the impacts of the QSA, restoration of the Salton Sea was legally required by statute in 2003 at the time the QSA was finalized. That legislation was specifically intended to prevent significant future harm to fish, wildlife, and people resulting from the QSA water transfers. The Salton Sea Restoration Act[68] mandates action to restore the habitats necessary for permanently supporting the numbers and variety of fish, birds, and other wildlife originally reliant on the Salton Sea ecosystem, and to protect people from various types of injurious consequences that will result if the lake continues to shrivel from freshwater deprivation, more of its lakebed is exposed, and its ecosystem collapses. If government officials fully satisfy their legal responsibilities, serious future harm to fish, wildlife, and people that would otherwise ultimately occur in the coming decades because of the QSA will not materialize.

The Proposed Action will cause cumulative and significant harm to fish, wildlife, and people long before full long-term restoration of the Salton Sea can feasibly be implemented, and also before the State completes and operates the interim projects in the 10-Year Plan necessary to satisfy its shirked legal obligations to properly mitigate harm resulting from the QSA water transfers. Moreover, some of the harmful consequences of the Proposed Action will be irreversible even if comprehensive restoration of the Salton Sea ultimately occurs in the future. Many foreseeable negative effects of the Proposed Action—including major emissions of

[68] California Fish and Game Code Chapter 13, Sections 2930 et seq. The Salton Sea Restoration Act was originally passed in 2003 as part of a package of legislation related to the 2003 QSA. It was strengthened in 2013 by passage of amendments that provided greater detail regarding the intent of the California Legislature in mandating Salton Sea restoration, clarified the State's specific restoration obligations, and required that the CNRA Secretary lead restoration efforts in coordination with the Salton Sea Authority.

hazardous particulates and greenhouse gases from exposed lakebed, die-offs of fish and birds, and human morbidity and mortality—constitute irremediable harm that cannot be retroactively cured by subsequent restoration actions. It is unreasonable and contrary to applicable law for Reclamation to assert, in essence, that none of this harm matters.

When previously proposing other recent agency actions that would also reduce inflows to the Salton Sea and would also foreseeably cause significant additional harm beyond the impacts of the QSA. Reclamation has repeatedly made essentially the same insupportable assertion that the agency has now made in the DEIS, i.e., that Salton Sea Impacts will not be cumulative or significant because the QSA will cause the same effects eventually. That unjustifiable assertion was made by Reclamation in the following documents: the Revised Draft Supplemental Environmental Impact Statement for Near-Term Colorado River Operations,[69] the Final Supplemental Environmental Impact Statement for Near-Term Colorado River Operations,[70] the Draft Environmental Assessment for the IID 2024-2026 Temporary Colorado River System Water Conservation Project,[71] and the Final Environmental Assessment for the IID 2024-2026 Temporary Colorado River System Water Conservation Project.[72] Despite public comments, including my own, pointing out that in fact the harm to be caused by the actions proposed in those documents would indeed be cumulative and significant, the agency nonetheless failed to respond appropriately to those comments and proceeded with the proposed actions. Those actions have greatly reduced inflows to the Salton Sea beyond the reductions resulting from the QSA, and have caused additional and significant harm. Now Reclamation makes the same indefensible claim again in support of another Proposed Action that will cause even worse harm to the Salton Sea and its ecosystem, fish and wildlife dependent on that ecosystem, the regional environment and the climate, and more than half a million people throughout the surrounding region. This is death by a thousand cuts, and Reclamation is wielding the knife.

The federal government has a responsibility "...to use all practicable means, consistent with other essential considerations of national policy, to... attain the widest range of beneficial uses of the environment **without degradation, risk to health or safety, or other undesirable and unintended consequences**..."[73] Similarly, the NEPA implementing regulations state, "**Federal agencies shall to the fullest extent possible... Use all practicable means**, consistent with the requirements of the Act and other essential considerations of national policy, **to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.**"[74] For Reclamation to proceed with the Proposed Action as currently formulated would be to violate these most fundamental federal responsibilities.

The DEIS presents inadequate, incorrect, and legally insupportable assertions and fails to properly analyze: (a) the significant direct, indirect, cumulative, and disproportionate negative impacts on the Salton Sea, the fish and wildlife reliant on the Salton Sea ecosystem, the environment, the climate, and people throughout the areas adjacent to the lake—including, but not limited to, Tribes and other environmental justice communities—that foreseeably will result if Reclamation proceeds with the Proposed Action; (b) alternatives for avoiding the foregoing adverse impacts; and (c) effective mechanisms for minimizing and fully mitigating the harmful effects that cannot be avoided. Reclamation's failure in the DEIS to properly evaluate the Proposed Action's harmful Salton Sea Impacts clearly violates the agency's legal obligations and must be fully remedied in a revised DEIS.

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[69] https://www.federalregister.gov/d/2023-23759/p-9.

[70] https://www.usbr.gov/ColoradoRiverBasin/documents/NearTermColoradoRiverOperations/20240300-Near-termColoradoRiverOperations-FinalSEIS-508.pdf

[71] https://www.usbr.gov/lc/region/g2000/envdocs.html.

[72] Ibid.

[73] NEPA, Section 101(b), emphasis added.

[74] 40 CFR Part 1500.2, emphasis added.

IV. Statements by Reclamation in the DEIS related to Salton Sea issues and Salton Sea Impacts are factually incorrect, misleading, and legally insupportable; and the agency's omissions violate applicable law

IV.A. Statements in the DEIS related to Salton Sea inflows are incorrect and misleading

In the DEIS Reclamation claims that, "Over the past 20 years, inflows to the Salton Sea have declined from 1.3 MAF per year to approximately 1.1 MAF per year."[75] This statement is incorrect and misleading; in reality, inflows have declined significantly more than Reclamation acknowledges, and will very likely continue to do so. Although total inflows to the Salton Sea were 1.094 MAF in 2021, they were 1.065 MAF in 2022, 0.987 MAF in 2023, 0.909 MAF in 2024,[76] and 0.890 MAF in 2025.[77] Inflows to the Salton Sea will very likely decline further in 2026 as a result of ongoing water conservation measures instigated and approved by Reclamation and the unusually high temperatures occurring this year in the Salton Trough, as well as because of the potential need for Reclamation to implement emergency reductions in Colorado River water allocations in the event that reservoir levels drop to critically low elevations due to the very dry conditions that are adversely affecting Colorado River streamflow. If the Proposed Action is implemented beginning in 2027, inflows will foreseeably plummet even further.

Reclamation also states in the DEIS that the lowest inflows to the Salton Sea that will occur pursuant to the Proposed Action would be 783,000 af; and claims further that, "Any resultant impacts [of the Proposed Action] are within the scope and range of inflows being considered in the SSMP's long-range plan and the USACE's ongoing NEPA process."[78] These statements are false and misleading. Catastrophically low allocations of water to Lower Basin states will foreseeably occur in the future as a result of worsening hydrology in the Colorado River Basin, and may even occur by the end of 2026. Based on the current dry conditions in the Upper Basin, in combination with the already-low elevations of reservoirs, Reclamation has projected that the elevation of Lake Powell may drop below minimum power pool by December 2026.[79] As Reclamation certainly knows, that scenario would necessitate radical reductions in the provision of Colorado River water to Lower Basin rights holders, including Salton Trough rights holders. If that situation occurs, inflows to the Salton Sea will plummet by an extreme amount. The water arriving in the lake would be a tiny fraction of 783,000 af, and far lower than the lowest inflow anticipated in the State's Long-Range Plan. Since the USACE is relying on the State's Long-Range Plan for its NEPA analysis,[80] the foreseeable inflows to the Salton Sea in the foregoing dire scenario would also be far lower than the inflows the Corps is considering.

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[75] DEIS, Chapter 3, Section 3.2.7, page 3-23.

[76] Figures for inflow each year during 2021-2024 are presented in the 2025 SSMP Annual Report, p.69. That report is available online at: https://saltonsea.ca.gov/wp-content/uploads/2025/03/2025-Annual-Report_508_WCAG.pdf.

[77] Pers. Com. S. Roy and K. Heidel at Tetra Tech, Inc., February 24, 2026. Tetra Tech is the contractor for the State of California that is assisting the State with preparation of the SSMP 2026 Annual Report, which has not yet been released.

[78] DEIS, Chapter 3, Section 3.2.7, page 3-24. It is unclear how the figure of 783,000 af was derived; it appears incorrect.

[79] U.S. Bureau of Reclamation, 24-Month Study Projections, Lower Colorado River Operations, Feb. 14, 2026. Available online at: https://www.usbr.gov/lc/region/g4000/riverops/24ms-projections.html.

[80] Statements by Corrie Stetzel, USACE Water Resources Planner, and Patrick O'Dowd, Executive Director/General Manager of the Salton Sea Authority, during the Salton Sea Authority Board Meeting on November 20, 2025, agenda item IV.C. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/.

IV.B. Statements in the DEIS related to Reclamation's authority appear to be inaccurate

In the DEIS, Reclamation also indicates that it does not have the authority to address Salton Sea Impacts because, "Reclamation does not control the end use and management of delivered or conserved water. As such, Reclamation has no management authority over inputs to the Salton Sea, and Reclamation has no enforcement authorities over the Salton Sea." This assertion appears to be inaccurate.

I am aware of at least one significant instance in which Reclamation did "control the end use and management of delivered or conserved water" and did exert "management authority over inputs to the Salton Sea." In 2010 IID announced that it would be making early deliveries into the Salton Sea of QSA mitigation flows destined for the lake in 2011 and 2012 pursuant to the District's QSA-related obligations, using part of IID's Colorado River water entitlement. The Metropolitan Water District (MWD) vehemently opposed the proposal, and argued that such deliveries would violate the Law of the River. IID maintained such early deliveries were necessary because of legal uncertainty at that time concerning the future of its QSA fallowing program, which was conserving the water used for mitigation inflows. The QSA had just been invalidated by the California Superior Court handling litigation regarding that complex series of agreements, and appeal of that court's ruling was pending. IID wanted to be sure that its legal obligations to provide mitigation flows into the Salton Sea would be met during pendency of the appeal, regardless of uncertainty about the future of the fallowing program. But MWD was immovable in objecting, and was not alone in challenging the early deliveries of mitigation water; other water agencies in other Colorado River Basin states expressed similar concerns that the suggested action would contravene the Law of the River. Most importantly, Reclamation told IID that sending Colorado River water directly into the Salton Sea was improper, notwithstanding the uncertainties involved in the QSA litigation.[81] Ultimately, because the early deliveries of mitigation water were in fact sent into the Salton Sea by IID, Reclamation later required the District to "repay" those amounts of Colorado River water to USBR.[82]

IV.C. Reclamation's reliance on the SSMP 10-Year Plan and USACE feasibility study to address Salton Sea Impacts of the Proposed Action is misguided

Reclamation relies on the activities of the SSMP and the USACE to avoid or mitigate any Salton Sea Impacts that may occur because of the Proposed Action, but that reliance is inappropriate and relies on incorrect and misguided assumptions. The DEIS states:

> The California Natural Resources Agency established the Salton Sea Management Program (SSMP) to oversee restoration efforts at the Salton Sea. Currently, the SSMP is working with local, state, tribal, and federal partners to implement the first phase of habitat restoration projects to establish at least 14,900 acres of aquatic habitat and up to 14,900 acres of vegetated habitat by the year 2028 (USACE 2024). Additionally, the SSMP released a long-range plan to address future recession of the Salton Sea beyond the year 2028 (California Natural Resources Agency 2024). The goal of the plan is to protect or improve air quality, water quality, and wildlife habitat to prevent or reduce health and environmental consequences anticipated from the long-term recession of the Salton Sea shoreline (California Natural Resources Agency 2024) … The SSMP's long-range plan is informing the scope of the Imperial Streams and Salton Sea Ecosystem Restoration Feasibility Study and NEPA compliance that the USACE is currently preparing. Once that process is complete, state and federal funding will be pursued to support the resultant design and construction of restoration projects, beginning around 2028.[83]

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[81] Some of the background details and correspondence among the parties related to these issues are in the following document: https://www.iid.com/home/showpublisheddocument/4698/635648001335730000

[82] The details of this "repayment" are complicated and beyond the scope of these comments.

[83] DEIS, Chapter 3, Section 3.2.7, page 3-23.

The 10-Year Plan is not fully funded, and—contrary to the claims of Reclamation—the SSMP is so far behind in performing the necessary work, as explained in Part II above, that there is no reasonable hope the remaining work to implement the 10-Year Plan will actually be completed by 2028. In addition, as also explained above, the State's Long-Range Plan is not itself an action plan for restoration that is actually being implemented; rather, it is a presentation of options for partial revitalization and full restoration that contains serious and fundamental deficiencies and defects that render its analysis scientifically unsound.[84] Furthermore, the multi-year USACE Imperial Streams and Salton Sea Aquatic Ecosystem Restoration Feasibility Study (the ISSS Study) that Reclamation references is also not fully funded, it is only in a formative stage, and it is hampered by major jurisdictional constraints and self-imposed subject-matter limitations, as described in Part II above. It is not expected to be completed by 2028, and any project it proposes will not be congressionally approved and funded (assuming that ultimately it is, in fact, approved and funded) until the end of 2030 or potentially even later. As explained in further detail in Part VI.B. below, the SSMP's 10-Year Plan, the SSMP's Long-Range Plan, and the activities of the Corps related to the ISSS Study do not even come close—either temporally or substantively—to being capable of avoiding, or minimizing and fully mitigating, the rapid and extremely harmful Salton Sea Impacts that the Proposed Action will foreseeably cause beginning in 2027.

IV.D. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on air quality and public health in the Salton Sea region

The Proposed Action will foreseeably cause elevated quantities of hazardous, toxic, and carcinogenic contaminants and noxious fumes to pollute the air across the Salton Sea region, causing injurious and even potentially lethal impacts on people. Reclamation completely failed to analyze these issues and must do so appropriately and fully in a revised DEIS.

Dust emissions resulting from the Proposed Action will foreseeably pollute inhabited areas with substances identified and regulated under federal and state law as hazardous, toxic, and carcinogenic. The inhalable pollutants will pose significant additional health threats to people in communities adjacent to the Salton Sea, including members of federally recognized Tribes, compounding the harm already being caused by the exposure of lakebed as a result of the ongoing QSA water transfers and additional water cutbacks instigated and approved by Reclamation during 2023-2026.

As defined by the U.S. Environmental Protection Agency, "Hazardous air pollutants, also known as toxic air pollutants or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects."[85] 188 substances qualifying as HAPs are listed pursuant to section 7412 of Title 42 of the U.S. Code and regulated by the U.S. Environmental Protection Agency.[86] In addition, Section 39655 of the California Health and Safety Code states that a toxic air contaminant (TAC) is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." The California Air Resources Board has formally identified 200 substances that qualify as TACs, including but not limited to all federally-identified HAPs.[87]

Numerous contaminants that are present in Salton Sea sediments and that are very likely to be constituents of the dust emitted from the exposed lakebed into the air breathed by people throughout the surrounding region are listed and regulated as hazardous air pollutants (HAPs) under federal law and as toxic air contaminants

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[84] See Part II above, and the links in footnote 47 for my detailed comments on the 2023 SSMP Draft Long-Range Plan and on the fatally flawed work of the U.C. Santa Cruz panel that was incorporated into the Long-Range Plan.

[85] https://www.epa.gov/haps/about-hazardous-air-pollutants.

[86] The current HAP list is available at: https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications.

[87] Substances listed as federal hazardous air pollutants (HAPs) are TACs under California law pursuant to Section 39657(b) of the California Health and Safety Code.

(TACs) under California law. Those harmful contaminants in lakebed sediments include, but are not limited to, heavy metals and metalloids such as arsenic, lead, chromium, nickel, cadmium, and selenium; polychlorinated biphenyls (PCBs); and residues of numerous legacy pesticides, such as DDT, that have been banned or severely restricted but previously accumulated in the Salton Sea's lakebed while they were in use in the U.S. and/or in Mexico.[88]

The harmful health effects of acute and chronic inhalation of the tiny airborne particulates known as PM_{10} and $PM_{2.5}$ are well established scientifically, and include but are not limited to respiratory symptoms, asthma attacks, acute and chronic bronchitis, worsening of chronic obstructive pulmonary disease (COPD), restricted activity days, increased emergency room visits and hospitalizations for pulmonary and cardiac causes, and premature mortality. Moreover, PM_{10} and $PM_{2.5}$ emitted from the exposed Salton Sea lakebed pose even greater risks of harm because they contain a variety of toxic and carcinogenic components designated as HAPs and TACs, as well as other dangerous substances such as microcystins from toxic algae blooms and *Coccidioides* fungal spores that cause serious and potentially lethal diseases. Dust emitted from the Salton Sea lakebed is "uniquely toxic," and far more hazardous than typical desert dust.[89] People in communities near the Salton Sea are already suffering significant and disproportionate pulmonary illness associated with chronic inhalation of dangerous particulates being emitted from exposed Salton Sea lakebed because of the QSA water transfers and other recent water cutbacks that have lowered the Salton Sea's elevation and exposed vast expanses of lakebed. For example, a recent study found that the childhood asthma rate for the portion of Imperial County closest to the Salton Sea's exposed lakebed was 22.4% in comparison to a nationwide prevalence of 8.4%.[90] The same study determined that chronic pulmonary symptoms in children not diagnosed with asthma are also unusually high in the Salton Sea region. Notably, emergency room visits for children ages 5-17 years with asthma in Imperial County are more than double the California statewide average.[91]

Because the Proposed Action will foreseeably and significantly increase the exposure and desiccation of Salton Sea lakebed and cause large additional emissions of hazardous dust, it will thereby compound the injurious and potentially irreversible consequences for public health that are already occurring. A recent study determined that "each one-foot drop in lake elevation creates, on average, $151.5 million in respiratory mortality costs in the Salton Sea counties…"[92] The proximity to the Salton Sea of environmental justice communities, including but not limited to Tribes, ensures they will be subjected to significantly worsening harm as the Proposed Action causes rapidly accelerated decline of the lake, substantially exacerbates ecosystem deterioration, and greatly increases the emission of dangerous pollutants from the exposed lakebed and the degrading lake itself into the region's air.

The Proposed Action's adverse impacts on air quality foreseeably will also worsen Imperial County's federal nonattainment status for $PM_{2.5}$ and state nonattainment status for PM_{10}, and Riverside County's federal nonattainment status for PM_{10} and state nonattainment status for $PM_{2.5}$, and will also jeopardize Imperial County's federal attainment status for PM_{10} and Riverside County's federal attainment status for $PM_{2.5}$. In so doing, the Proposed Action will violate the Clean Air Act's General Conformity requirement[93] by causing or contributing to new violations, and/or increasing the frequency or severity of existing violations, and/or

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[88] The current TAC list is online at: https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

[89] For example, recent research concluded that dust from exposed Salton Sea lakebed causes lung inflammation that is distinct from the pulmonary effects of exposure to typical desert dust. Biddle, T.A. et al. (2023). Aerosolized aqueous dust extracts collected near a drying lake trigger acute neutrophilic pulmonary inflammation reminiscent of microbial innate immune ligands. *Science of the Total Environment* 858(3):159882, https://doi.org/10.1016/j.scitotenv.2022.159882.

[90] Farzan, S.F. et al. (2019). Assessment of Respiratory Health Symptoms and Asthma in Children near a Drying Saline Lake. *Int. J. Env. Res. Public Health*, 16(20):3828, https://doi.org/10.3390/ijerph16203828.

[91] https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHIB/CPE/Pages/CaliforniaBreathingCountyAsthmaProfiles.aspx.

[92] Jones, B.A. and Fleck, J. (2020). Shrinking lakes, air pollution, and human health: Evidence from California's Salton Sea. *Science of the Total Environment* 712(22):136490, http://dx.doi.org/10.1016/j.scitotenv.2019.136490.

[93] 42 U.S.C. § 7506(c).

delaying timely attainment of federal ambient air quality standards for $PM_{2.5}$ and PM_{10} in Imperial and Riverside Counties respectively, in a manner that does not conform to the State Implementation Plan for air quality.

The Proposed Action's adverse impacts on air quality will also cause negative socioeconomic effects across the Salton Sea region that will be cumulative and significant, as well as foreseeably unmitigated. Poor air quality is associated with increased medical expenses, increased loss of work days due to illness, decreased property values, decreased tourism and visitor satisfaction, and related decreases in visitor spending levels and economic impacts on businesses.[94]

IV.E. The DEIS fails to perform the necessary analysis of the Proposed Action's harmful impacts on fish and wildlife reliant on the Salton Sea ecosystem

NEPA explicitly requires agencies to consider foreseeable adverse impacts of a proposed federal action on species listed as endangered or threatened under the U.S. Endangered Species Act, and on their habitat. Applicable law also requires agencies to consider harmful effects on other species, including but not limited to ones protected under the Migratory Bird Treaty Act[95] and various provisions of state law, in particular when the proposed action's affected environment includes "ecologically critical areas."[96] The DEIS unreasonably fails to present the legally required evaluation of pertinent issues.

The Salton Sea is a globally significant Important Bird Area (IBA) that has served as a crucial feeding, nesting, wintering, and stopover site for millions of birds of more than 400 species. For countless birds, including ones that face known threats to their continued survival, there is no other location that can substitute for their habitat in the Salton Sea ecosystem. It is foreseeable that the Proposed Action's water-use reductions will cause significant negative effects on aquatic, wetland, and riparian habitat, and will consequently cause injurious impacts on many, if not all, Special Status Species that depend on such habitat and are known to be present at the Salton Sea and around its perimeter, in wetlands and riparian areas associated with the Salton Sea and its tributaries, within IID's water service area, within CVWD's water service area, along the All-American Canal, along the Coachella Canal, and/or in other locations within the Salton Sea ecosystem. The Proposed Action will also foreseeably cause significant harm to migratory bird species covered by the protections of the Migratory Bird Treaty Act, as well as to other wildlife reliant on the Salton Sea ecosystem as "ecologically critical" habitat.[97]

The Proposed Action is ultimately very likely to cause many thousands of additional acres of Salton Sea lakebed to become exposed, beyond the areas that would otherwise have been exposed because of the QSA. Moreover, the inflow reductions resulting from the Proposed Action will substantially and rapidly increase the Salton Sea's salinity and will have other damaging impacts on water quality, all of which will degrade and foreseeably destroy the crucial lacustrine ecosystem that provides essential sustenance for fish and birds, including numerous Special Status Species. In addition, the Proposed Action's water-use reductions will result in substantial decreases in the flow of Salton Sea tributaries, including but not limited to agricultural drains and rivers that carry agricultural wastewater. The diminished flow will cause adverse impacts on aquatic, riparian, and wetland habitat; and those negative effects will result in significant injurious consequences for fish and wildlife, including Special Status Species. The failure of the DEIS to carefully and thoroughly evaluate these issues violates applicable law.

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[94] See, e.g., Tourism Economics. 2014. The Potential Economic Impact of the Salton Sea on the Greater Palm Springs Tourism Industry. https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/palmsprings/salton_sea_eis_ff17089f-eed9-4619-a89f-df859da583dc.pdf.

[95] 16 U.S.C. §§ 703-712. The list of birds protected pursuant to the MBTA is available at 50 CFR 10.13. The list was recently updated, effective August 1, 2023 (88 FR 49310).

[96] 40 CFR 1501.3(d)(2)(ii).

[97] Ibid.

Reclamation should have carefully analyzed the Proposed Action's foreseeable and significant adverse effects on all species known to be present in or likely utilizing the Salton Sea ecosystem that are listed as endangered or threatened under federal law and/or state law, and the agency should also have evaluated the foreseeable and significant negative impacts on numerous additional Special Status Species, migratory birds protected by the Migratory Bird Treaty Act, species of special conservation concern under federal and/or state law, and many other wildlife species dependent on the Salton Sea ecosystem as crucial habitat. Because Reclamation failed to conduct the required analysis, the agency must do so in a revised DEIS.

Protected avian species that are known to utilize the Salton Sea ecosystem and that foreseeably will be adversely affected by the Proposed Action include, but are not limited to, the following Special Status Species (including species designated as endangered or threatened under federal and/or state law, species proposed for listing as endangered or threatened under federal and/or state law, and species designated as of special conservation concern under federal and/or state law) and other species that are fully protected in California: Desert pupfish (*Cyprinodon macularius*), American peregrine falcon (*Falco peregrinus anatum*), American white pelican (*Pelecanus erythrorhynchos*), bald eagle (*Haliaeetus leucocephalus*), bank swallow (*Riparia riparia*), Barrow's goldeneye (*Bucephala islandica*), black tern (*Chlidonias niger*), black skimmer (*Rhynchops niger*), black tern (*Chlidonias niger*), brant goose (*Branta bernicla*), burrowing owl (*Athene cunicularia*), California black rail (*Laterallus jamaicensis coturniculus*), California brown pelican (*Pelecanus occidentalis californicus*), California gull (*Larus californicus*), Crissal thrasher (*Toxostoma crissale*), double-crested cormorant (*Nannopterum auritum*), elegant tern (*Thalasseus elegans*), elf owl (*Micrathene whitneyi*), Gila woodpecker (*Melanerpes uropygialis*), gull-billed tern (*Gelochelidon nilotica*), laughing gull (*Leucophaeus atricilla*), least Bell's vireo (*Vireo bellii pusillus*), least bittern (*Ixobrychus exilis*), least tern (*Sternula antillarum*), Le Conte's thrasher (*Toxostoma lecontei*), lesser sandhill crane (*Grus canadensis canadensis*), long-billed curlew (*Numenius americanus*), long-eared owl (*Asio otus*), mountain plover (*Charadrius montanus*), northern harrier (*Circus cyaneus*), osprey (*Pandion haliaetus*), redhead (*Aythya americana*), short-eared owl (*Asio flammeus*), Southwestern willow flycatcher (*Empidonax traillii extimus*), summer tanager (*Piranga rubra*), vermillion flycatcher (*Pyrocephalus rubinus*), Western snowy plover (*Charadrius nivosus nivosus*), yellow warbler (*Setophaga petechia*), yellow-breasted chat (*Icteria virens*), Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), white-tailed kite (*Elanus leucurus*), and wood stork (*Mycteria Americana*). Reclamation should evaluate the harmful impacts of the Proposed Action on the foregoing species in a revised DEIS.

Additionally, the DEIS fails to analyze the impacts of the Proposed Action on many other protected species, including but not limited to ones listed under the Migratory Bird Treaty Act, which depend on ecologically critical habitat in the Salton Sea ecosystem and foreseeably will be greatly harmed by the Proposed Action. Those additional species are too numerous to specify here. The necessary analysis should be performed in a revised DEIS.

IV.F. The DEIS fails to analyze the Proposed Action's impacts on biogenic greenhouse gas emissions in the central Salton Basin and associated economic costs

Significant and costly biogenic greenhouse gas (GHG) emissions that will result from exposure of the Salton Sea's lakebed and deterioration of its ecosystem because of the Proposed Action are not considered at all in the DEIS, nor are the major economic costs of those GHG emissions. Federal guidance previously applicable to NEPA analyses explicitly required that agencies "must disclose and consider…the extent to which a proposed action and its reasonable alternatives (including the no action alternative) would result in reasonably foreseeable GHG emissions that contribute to climate change."[98] Moreover, previously applicable federal guidance stated that an agency's NEPA analysis should "quantify a proposed action's projected GHG emissions…for the expected lifetime of the action," and "provide additional context for

[98] National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (2023). Council on Environmental Quality, Executive Office of the President, January 4, 2023, Section IV.

GHG emissions, including through the use of the best available social cost of GHG (SC-GHG) estimates, to translate climate impacts into the more accessible metric of dollars, allow decision makers and the public to make comparisons, help evaluate the significance of an action's climate change effects, and better understand the tradeoffs associated with an action and its alternatives…"[99] Although the Trump administration's Council on Environmental Quality (CEQ) officially withdrew this guidance on May 28, 2025 pursuant to a broader deregulatory shift under Executive Order 14154, and although the administration has also directed agencies not to include analysis of GHG emissions and climate impacts in NEPA processes unless required by statute, the scientific basis for performing those analyses is very strong and well-established. I therefore suggest that the DEIS should have included an analysis of the significant biogenic GHG emissions, and the very large associated economic costs, that will foreseeably result from the effects of the Proposed Action on the Salton Sea and its ecosystem.

The Proposed Action's reductions in freshwater inflows to the central Salton Basin will cause large additional areas of carbon-rich Salton Sea lakebed to be exposed to the atmosphere, will push the lake into extreme hypersalinity, and will exacerbate breakdown of the lake's ecosystem. An important body of recent scientific research indicates these changes attributable to the Proposed Action will result in major quantities of biogenic greenhouse gases—including carbon dioxide, methane, and nitrous oxide—being emitted to the atmosphere on an ongoing basis for the foreseeable future unless an appropriate and effective restoration plan for the Salton Sea and its ecosystem is implemented.[100]

The biogenic GHG emissions attributable to the Proposed Action are likely to be very large. Assuming that only 40 square miles of additional Salton Sea lakebed will be exposed because of the Proposed Action (which is likely a large underestimate), and assuming that the exposed lakebed will emit only carbon dioxide and no methane or nitrous oxide (which are much more powerful greenhouse gases than CO_2 and are likely to be emitted in significant quantities from the exposed lakebed), and also assuming that there will be no other GHG emissions caused by the extremely detrimental changes to the Salton Sea and its ecosystem that will result from the Proposed Action (a conservative assumption, because it is very likely there will indeed be such additional GHG emissions), yields the conclusion that approximately 3 million metric tons of CO_2 will be emitted annually for the foreseeable future solely due to the Proposed Action.[101] This is a very conservative estimate for the quantities of ongoing GHG emissions attributable to the Proposed Action; the actual emission amounts will foreseeably be much bigger. But even 3 million metric tons of CO_2 emitted per year is a large and concerning quantity; it is equivalent to the annual emissions of 652,174 typical gas-fueled passenger vehicles.[102]

In the DEIS Reclamation also failed to consider the economic costs of the biogenic greenhouse gas emissions that will foreseeably result from the Proposed Action's negative effects on the Salton Sea and its ecosystem. The social cost of greenhouse gases (SC-GHG)—referred to more specifically in analyses performed in federal contexts as the social cost of carbon dioxide (SC-CO_2), the social cost of methane (SC-

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[99] Id., Section II.

[100] See the following peer-reviewed report and the references cited therein: Ross, J.E. (2022). Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans. Report submitted to the Salton Sea Long-Range Planning Committee of the Salton Sea Management Program, California Natural Resources Agency, January 27, 2022. 14 pp. https://doi.org/10.13140/RG.2.2.36775.62884. Also see the Supplementary Information for that report, explaining the possible magnitude of the greenhouse gas emissions at the Salton Sea if vast areas of lakebed are left exposed and the residual Salton Sea becomes extraordinarily hypersaline. https://doi.org/10.13140/RG.2.2.10089.36964. Numerous additional studies supporting the conclusions of the foregoing report and its supplementary information have been published since that report was prepared. In particular, a recent study of biogenic GHG emissions from the exposed lakebed of the Great Salt Lake determined the areas of lakebed that were desiccated as of 2020 emitted approximately 4.1 million tons of CO_2eq into the atmosphere during that year. Cobo, M., et al. (2024). A desiccating saline lake bed is a significant source of anthropogenic greenhouse gas emissions. *One Earth* 7(8):1414-1423, https://doi.org/10.1016/j.oneear.2024.07.001.

[101] This conclusion relies on the calculation method presented in the Supplementary Information for the report "Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans" (see the citation in footnote 100 above).

[102] https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle.

CH_4), and the social cost of nitrous oxide (SC-N_2O)[103]—is a metric that has been applied by federal agencies and some state agencies to estimate the economic costs incurred by society as a result of the emission of greenhouse gases. Prior to 2025, when President Trump told federal agencies to ignore the economic costs of GHG emissions unless required by statute to consider that issue, the SC-GHG metric was utilized across the entirety of the federal government when agencies evaluated the potential consequences of proposed policies or actions, including when conducting analyses pursuant to NEPA.[104] An evaluation of the climate impacts of proposed federal action that fails to include analysis of the SC-GHG implicitly and improperly assumes that the economic costs for society of GHG emissions, as well as the benefits of reducing those emissions, have a value of zero. It is firmly established both factually and scientifically that the actual costs and benefits are very far from zero, even for a single ton of CO_2.

The additional biogenic GHG emissions in the central Salton Basin that will foreseeably result from the Proposed Action, in combination with the large quantities of biogenic GHG emissions resulting from the QSA water transfers and from additional water cutbacks during 2024-2026,[105] could cause the associated economic costs of those GHGs to reach scores of billions of dollars in the coming years,[106] and could thwart California's efforts to attain carbon neutrality, thereby worsening climate change. I suggest the DEIS should have analyzed these reasonably foreseeable and significant adverse impacts of the Proposed Action, and should have suggested measures for avoiding such impacts or minimizing and fully mitigating them to the extent they cannot be avoided.

V. The DEIS violates the federal Indian trust responsibilities of Interior and Reclamation

Pursuant to the federal Indian trust responsibility, Interior and Reclamation have a legally enforceable fiduciary obligation and "moral obligations of the highest responsibility and trust"[107] to safeguard Tribal lands, natural and cultural resources, and other assets from damage, waste, and depletion; to protect Tribal health,

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[103] U.S. EPA (2023). Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. Available online at: https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf.

[104] The federal Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) previously recognized that the social cost of greenhouse gases should apply to all "relevant agency actions," and not just regulatory ones. (Interagency Working Group on the Social Cost of Greenhouse Gases (Feb. 2021), Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide – Interim Estimates under Executive Order 13,990, at p.14.) The IWG also previously noted that the social cost of greenhouse gases has been used previously in NEPA analyses in particular. (Id. at p.12.) Although President Trump recently disbanded the IWG, the scientific validity of their findings and recommendations remains well-established.

[105] In the Supplementary Information for my January 2022 GHG report, cited in footnote 100 above ("the Supplementary Information"), I explained the possible magnitude of the GHG emissions involved. To derive a rough estimate, I relied on source data for a lake that is the most similar to the Salton Sea of all the lakes for which data were available. I considered only CO_2 emissions and did not include any emissions of methane or nitrous oxide. My analysis indicated that a ballpark approximation of future biogenic CO_2 emissions if vast areas of lakebed are left exposed and the residual Salton Sea becomes extraordinarily hypersaline is 26 million metric tons per year. Although that rough estimate is a very large amount, it would be reasonable to consider it to be a conservative approximation of the actual GHG emissions involved, because my calculation did not include any emissions of CH_4 or N_2O, yet those GHGs are likely to be emitted in significant quantities.

[106] To perform the necessary calculation (which very conservatively assumes that no methane or nitrous oxide will be emitted), the estimated total emissions amount in the Supplementary Information cited in footnote 100 and described in footnote 105 should be used along with data in Appendix A, section A.5, Table A.5.1 of the following reference: U.S. EPA (2023), Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf. Although in 2025 President Trump instructed federal agencies to stop taking into account the economic damage caused by climate change unless required to do so by statute, no new guidance documents have been published by EPA and the scientific validity of the agency's 2023 Report on the Social Cost of Greenhouse Gases remains well-established.

[107] Seminole Nation v. United States, 316 U.S. 286 (1942)

safety, and welfare; and to faithfully carry out other mandates of federal law with respect to Tribal lands, resources, and assets, and for the protection and benefit of Tribal members.[108]

For example, Part 512, Chapter 2 of Interior's Departmental Manual, entitled Departmental Responsibilities for Indian Trust Resources, provides in part as follows (emphasis added):

> ... 2.2. Policy. **It is the policy of the Department of the Interior to recognize and fulfill its legal obligations to identify, protect, and conserve the trust resources of federally recognized Indian tribes and tribal members, and to consult with tribes on a government-to-government basis whenever plans or actions affect tribal trust resources, trust assets, or tribal health and safety.**
>
> 2.3. Responsibilities.
>
> A. **Heads of bureaus and offices are responsible for identifying any impact of Departmental plans, projects, programs or activities on Indian trust resources. Department officials shall:**
>
> **(1)** Establish procedures to **ensure that the activities of Departmental organizations impacting upon Indian trust resources are explicitly addressed in planning, decision, and operational documents...**
>
> 2.4. Procedures.
>
> A. Reports. **As part of the planning process, each bureau and office must identify any potential effects on Indian trust resources. Any effect must be explicitly addressed in the planning/decision documents, including,** but not limited to, Environmental Assessments, **Environmental Impact Statements, and/or Management Plans prepared for the project or activity.** The documentation shall:
>
> (1) Clearly state the rationale for the recommended decision; and
> (2) Explain how the decision will be consistent with the Department's trust responsibility.
>
> B. Consultation. **In the event an evaluation reveals any impacts on Indian trust resources, trust assets, or tribal health and safety, bureaus and offices must consult with the affected recognized tribal government(s),** the appropriate office(s) of the Bureau of Indian Affairs, the Office of the Solicitor, and the Office of American Indian Trust. Each bureau and office within the Department shall be open and candid with tribal government(s) during consultations so that the affected tribe(s) may fully evaluate the potential impact of the proposal on trust resources and the affected bureau(s) or office(s), as trustee, may fully incorporate tribal views in its decision-making processes.

In addition, Part 303, Chapter 2 of Interior's Departmental Manual, entitled Principles for Managing Indian Trust Assets, provides in part as follows (emphasis added):

> 2.7 Trust Principles. **It is the policy of the Department of the Interior to discharge, without limitation, the Secretary's Indian trust responsibility with a high degree of skill, care, and loyalty. The proper discharge of the Secretary's trust responsibilities requires that persons who manage Indian trust assets:**
>
> A. **Protect and preserve Indian trust assets from loss, damage, unlawful alienation, waste, and depletion**...
>
> ...
>
> M. **Protect treaty-based fishing, hunting, gathering, and similar rights of access and resource use on traditional tribal lands.**

[108] Department of the Interior, Departmental Manual, Part 303, Chapter 2, and Part 512, Chapter 2.

Reclamation's failure in the DEIS to identify, explicitly evaluate, and commit to minimizing and fully mitigating the foreseeable and significant impacts of the Proposed Action on Tribal lands, natural and cultural resources and other assets on those lands, as well as on Tribal health, safety, and welfare, violates the federal Indian trust responsibility and related statutes, regulations, case law, and policies.

The Desert Cahuilla Indians have lived in the northern Salton Trough for many thousands of years, and throughout that time have relied upon traditional Tribal lands and other cultural and natural resources and assets in the central Salton Basin, including but not limited to: large lakes; their shorelines, wetlands, and tributaries; associated wildlife, such as fish and birds; associated plants; and the area's groundwater and springs. The Desert Cahuilla also created and utilized culturally important sites, structures, and objects (e.g., stone fish traps and walk-in wells) for traditional Tribal activities in the Salton Basin related to the foregoing Tribal lands and other natural and cultural resources and assets.

The Tribal reservation lands of the Torres Martinez Desert Cahuilla Indians, a federally recognized Tribe, total approximately 24,000 acres directly adjoining the Salton Sea and its increasingly exposed lakebed, and also include regions of the lake itself, as well as areas that were previously within the lake but are now part of the exposed lakebed. Foreseeable and significant negative impacts of the Proposed Action affecting the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, and the health, safety, and welfare of Tribal members include, but are not limited to: hazardous, toxic, and carcinogenic dust blowing off of the Salton Sea's increasingly exposed lakebed as the Salton Sea shrinks from freshwater deprivation; toxic algae blooms in the lake and in associated wetlands and tributaries, and hazardous microbial components emanating from toxic algae blooms in the form of aerosol particles and droplets; noxious hydrogen sulfide gas being emitted from the lake and its marshes as the Salton Sea's water quality and ecosystem deteriorate; and the death and disappearance of originally profuse fish and bird populations.[109] It is foreseeable that all those injurious effects will be substantially exacerbated if the Proposed Action is implemented.

In the DEIS Reclamation should have: (a) fully evaluated the reasonably foreseeable types of harm that may result from the Proposed Action and adversely affect the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, and the health, safety, and welfare of Tribal members; b) consulted with the Torres Martinez Desert Cahuilla Indians concerning the Proposed Action, the details of the foreseeable harm that may affect the Tribe and its resources, and potential mitigation measures; and (c) committed to minimize and fully mitigate the harmful impacts of the Proposed Action on the Tribe.

Interior and Reclamation have failed to satisfy their legally enforceable Indian trust obligations with respect to injurious impacts on the Torres Martinez Desert Cahuilla Indians that are reasonably foreseeable effects of the Proposed Action.[110] The agencies have not consulted with the Torres Martinez Tribe regarding these specific issues in the manner required.[111] In addition, Reclamation has not presented an analysis in the DEIS of the foreseeable harmful effects of the Proposed Action on the lands, natural and cultural resources, and other assets of the Torres Martinez Tribe, or on the health, safety, and welfare of Tribal members; and Reclamation has not committed to minimizing and fully mitigating the harm to the Tribe that will foreseeably result from the Proposed Action. Reclamation's failure to discharge these duties violated the agency's Indian trust responsibility and applicable law.[112] This indefensible breach of Reclamation's and Interior's legally enforceable obligations must be fully remedied in a revised DEIS.

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[109] This recitation of harmful impacts on the Torres Martinez Desert Cahuilla Indians is not intended to be exhaustive.

[110] Reclamation may also have violated the agency's Indian trust responsibility with regard to other Tribes in the Salton Sea region.

[111] Salton Sea Authority (February 27, 2026). Public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, page 6. Available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf. The Torres Martinez Tribe is represented on the Board of the Salton Sea Authority, and is a signatory on the cited comment letter.

[112] Please note that I do not represent or speak on behalf of the Torres Martinez Desert Cahuilla Indians or any other Tribe. I offer these comments solely as a concerned citizen and as someone who has extensive knowledge about matters

VI. Cumulative and significant Salton Sea Impacts will foreseeably be devastating if Reclamation proceeds with the Proposed Action while failing to ensure those harmful consequences are avoided or minimized and fully mitigated

VI.A. Summary of cumulative and significant Salton Sea Impacts that will greatly harm fish and wildlife, the regional environment, the climate, and people throughout the Salton Sea area

In the DEIS, Interior and Reclamation should have carefully considered all of the following cumulative and significant Salton Sea Impacts, and other harmful consequences in the Salton Sea region, that foreseeably will result from the Proposed Action. Interior and Reclamation must properly evaluate all these impacts of the Proposed Action, and other adverse consequences, in a revised DEIS. This discussion is not intended to be an exhaustive itemization of all foreseeable, cumulative, and significant Salton Sea Impacts.

- Major decreases in the volume, depth, and surface area of the Salton Sea will occur. The resulting harmful impacts will include, but may not be limited to, dangerously degraded water quality, loss of habitat for fish and wildlife, associated injurious biological and ecological consequences, and exposure of vast areas of additional Salton Sea lakebed.

- Huge additional quantities of hazardous particulates (PM_{10} and $PM_{2.5}$) originating from the exposed Salton Sea lakebed will be chronically emitted into the region's atmosphere, fouling air quality and greatly endangering public health. Harmful dust and aerosol droplets will be released from exposed lakebed and from the deteriorating Salton Sea, as well as from other degrading waterbodies in the Salton Sea ecosystem suffering from freshwater deprivation. The particulates are known to contain dangerous, toxic, and carcinogenic constituents, including but not limited to heavy metals, PCBs, and residues of banned pesticides that would otherwise be sequestered in undisturbed sediments beneath the waters of the Salton Sea. Microcystins and other toxins derived from harmful algae blooms that pose inhalation, ingestion, and dermal-contact hazards will also very likely be components of dust emitted from the exposed lakebed, and in the aerosol droplets discharged from the shriveling lake and other waterbodies. *Coccidioides* spores, which cause potentially fatal coccidioidomycosis (Valley Fever), and other hazardous microbial materials are foreseeably present in the dust and aerosol droplets as well. Dangerous emissions of particulates from exposed lakebed will occur on an ongoing basis regardless of dust mitigation activities, because such measures can somewhat reduce the problem but cannot eliminate it.

- Greatly worsened public health threats will cause increased morbidity and mortality.[113] More than half a million people throughout the region adjacent to the Salton Sea—including Tribes and other disadvantaged communities—will be obliged to breathe hazardous, toxic, and carcinogenic particulates emitted into the region's air from exposed Salton Sea lakebed, and to suffer ongoing exposure to toxins from harmful algae blooms, other dangerous microbial materials being emitted from the degraded Salton Sea and associated deteriorating waterbodies, and increasing releases of noxious fumes, such as hydrogen sulfide. It is foreseeable that serious diseases and fatalities will consequently occur.

- There will be rapid and significant increases in the salinity of the residual Salton Sea, as well as other negative effects on water quality, including but not limited to decreases in dissolved oxygen and increased concentrations of hazardous contaminants. The residual Salton Sea will eventually be

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related to the past, present, and future of the Salton Sea and associated issues affecting people throughout the surrounding region, including but not limited to Tribes.

[113] See the discussion in Part IV.D. above, and the references cited in footnotes 30, 31, 32, 33, 34, and 92.

pushed into a state of extreme hypersalinity in which the lake will be ecologically useless and incapable of supporting any organisms other than halophilic bacteria, archaea, viruses, and other microorganisms—many of which may be harmful to wildlife and people.

- The remaining Salton Sea fish and invertebrates—which have provided an essential food supply for millions of migratory and resident birds—will be extirpated in the residual lake as a result of physiologically intolerable salinity levels, and potentially in part because of other adverse impacts on water quality. They will also likely be extirpated from some, if not all, associated wetlands and tributaries as those waterbodies are adversely affected by freshwater deprivation.

- Rapid deterioration and loss of crucial habitat for hundreds of species of birds will foreseeably occur. In particular, there will likely be loss of essential habitat for millions of migratory birds that depend on the Salton Sea ecosystem during twice-yearly migrations, and that have no other appropriate resting and feeding locations in a vast arid region as they travel enormous distances. Most or all essential aquatic habitat will be lost.

- Crowding of birds in remaining usable areas of habitat is likely to enhance avian disease transmission, cause outbreaks that are difficult to control, and result in major die-offs of birds.

- There will be greatly increased threats to the continued existence of migratory and resident avian species that are already designated as endangered, threatened, or of special concern under federal and/or state law and that depend on the Salton Sea ecosystem for resting, feeding, and/or breeding.

- Also in jeopardy will be the continued survival of the desert pupfish (*Cyprinodon macularius*), which is already designated as an endangered species under the U.S. Endangered Species Act and California law, and is reliant on the Salton Sea ecosystem.

- Threats to the health and survival of numerous species will result from increased contact with and ingestion of contaminated sediments in exposed Salton Sea lakebed, and hazardous substances in polluted tributary water that will flow undiluted across expanses of exposed lakebed and attract wildlife. In addition, the food web will be affected by potentially dangerous biomagnification of some pollutants.

- Exposure and drying of portions of the central region of the Salton Sea lakebed will pose additional and particularly significant threats to wildlife and people. Ongoing research has established that elevated levels of hazardous, toxic, and carcinogenic contaminants are highest in Salton Sea sediments within the central region of the lakebed.[114] It is therefore foreseeable that exposure of central lakebed areas and emission of fugitive dust from them will result in particularly consequential adverse impacts on air quality and public health. In addition, because the most contaminated lakebed areas will be exposed adjoining the residual Salton Sea, it is also likely there will be increased harmful effects on wildlife drawn to the remaining water.

- Major quantities of greenhouse gases—including carbon dioxide, methane, and nitrous oxide—will come from numerous biogenic sources within the original Salton Sea footprint. The biogenic GHG emissions will come from a variety of sources, including but not limited to: vast areas of exposed lakebed (including dry lakebed sediments, intermittently rewetted sediments, and sediments that are disturbed—e.g., by furrowing for dust control); tributary streams dispersing across large expanses of exposed lakebed; and the residual Salton Sea as it becomes extremely hypersaline.[115] The quantities of the GHG emissions could be so large they will undermine federal and state statutory and policy

[114] Statements by Dr. Timothy Lyons (University of California, Riverside) during the May 16-17, 2023 California State Water Resources Control Board workshop on the Salton Sea. (Video of the workshop is available online at: https://www.waterboards.ca.gov/board_info/video.html. Dr. Lyons speaks during Panel 4 on May 17.)

[115] See the report and other information cited in footnote 100.

objectives related to achieving net-zero emissions, and will worsen climate change.[116] In addition, the potentially enormous scale of the GHG emissions involved could ultimately result in the cumulative economic cost of those emissions reaching at least scores of billions of dollars—and possibly much greater amounts—during the coming decades.[117]

- Areas of the Salton Sea lakebed containing unexploded ordnance (UXO), which was dropped into the lake during wartime military training activities in the 1940s and 1950s, are likely to be exposed as the Salton Sea shrinks. Exposure of UXO could pose significant public safety risks. None of the UXO risk areas is expected to be cleaned up by the Department of Defense until after 2028, and most will not be remediated until 2038 or much later.[118]

- All aspects of the economy across the Salton Sea region will suffer negative impacts because of deteriorating environmental conditions and increasing threats to public health, fish, and wildlife. The adverse effects will include, but will not be limited to, major economic harm to all types of businesses and industries, decreased property values, lost work days, increased medical expenses, and loss of tourism.

- The region's important agricultural industry will be negatively affected by threats to the health of workers from hazardous, toxic, and carcinogenic airborne particulates, and by deposition onto crops of damaging salt particles and contaminants blown from increasing areas of exposed Salton Sea lakebed. These impacts on agriculture will compound the negative economic effects throughout the region that will be caused by the loss of large quantities of Colorado River water needed for irrigation, and by the related fallowing of farm fields, decreased crop production, reduced employment, and diminished income for farmers and businesses associated with agriculture.

- Significant adverse impacts on the environment in the Salton Sea region will foreseeably affect major military installations and impair essential military operations, with potential negative consequences for military readiness and national security. Worsening dust storms containing dangerous particulates emanating from the central Salton Basin will impact the functions of the El Centro Naval Air Facility (NAS El Centro) in Imperial County, because flights to and from NAS El Centro will be grounded during major dust storms within the Salton Basin. Potential harmful health effects on military personnel are also foreseeable. In addition, critical military air operations at the Chocolate Mountain Aerial Gunnery Range (CMAGR) will be negatively affected by large quantities of fugitive dust from exposed Salton Sea lakebed. The CMAGR is located adjacent to the Salton Sea, to the east and southeast of the lake, and is in the direct path of hazardous particulates blown from exposed lakebed by prevailing winds.[119]

- Unsafe air quality in the central Salton Basin could jeopardize commercial-scale lithium extraction, an emerging industry that is anticipated to be central for U.S. efforts to develop renewable energy and fight climate change in the coming years. Chronic impairment of air quality with hazardous particulates containing toxic and carcinogenic constituents will likely be worst in the area where lithium extraction and processing facilities must be located, within the Salton Sea Geothermal Field near the southeast shore of the Salton Sea. Prevailing winds blowing across the exposed lakebed and the residual, degraded Salton Sea will push airborne pollutants directly into that area. It is foreseeable that dangerous air quality will impair the ability of the lithium industry to attract the

[116] See the information in footnote 105.

[117] See the information in footnote 106.

[118] Final Environmental Assessment/Combined Decision Document for the Salton Sea Management Program (SSMP) Phase 1: 10-Year Plan (2024), Appendix 1, Table 4-27. https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/Salton-Sea-Management-Plan/.

[119] Similar problems previously afflicted Naval Air Weapons Station China Lake in the western Mojave Desert region of California because of dust storms emitted from desiccated Owens Lake. Frequent and extremely costly cessation of important military activities was necessary due to unsafe air quality and impaired visibility.

large numbers of skilled workers it will require, and will adversely affect the health of those who choose to work at the necessary facilities near the shriveling and deteriorating Salton Sea.

- Major shrinkage of the Salton Sea plus foreseeable curtailment of irrigated agriculture in the Imperial Valley (and in the Coachella and Mexicali Valleys) will negatively affect Salton Trough climate and hydrology, and possibly climate and hydrology in other areas of the Colorado River Basin as well.[120] Very large decreases in the previously immense quantities of water vapor injected into the regional atmosphere by evaporation from the full Salton Sea's surface, and reduced evapotranspiration from areas of irrigated crops due to constraints on Colorado River water allocations, will engender hotter ambient temperatures and dryer hydrologic conditions across the region. It is foreseeable that those effects will in turn cause negative impacts on public health and wildlife, as well as on agricultural production and other aspects of the regional economy. In addition, a detrimental feedback effect could result from the higher temperatures and drier hydrology related to the lake's shrinkage, causing further decreases in water availability, lower inflows to the central Salton Basin, additional decline of the residual Salton Sea, and even hotter and drier climate conditions.

- The Proposed Action will foreseeably result in violations of federal and state statutes, regulations, and policies related to air quality, water quality, threatened and endangered species, climate, occupational safety and health, food safety, and other important matters administered and enforced by government entities. The federal statutes that are likely to be violated include, but are not limited to, the Clean Air Act, the Clean Water Act, and the Endangered Species Act.

VI.B. Reclamation cannot properly rely on the SSMP 10-Year Plan and the USACE's ISSS Study to address Salton Sea Impacts of the Proposed Action

In the DEIS, Reclamation relies on the State of California's SSMP 10-Year Plan[121] and the ISSS Study being performed by the U.S. Army Corps of Engineers as the sole measures to avoid, or minimize and fully mitigate, all harmful Salton Sea Impacts of the Proposed Action. That reliance is seriously misplaced. Those state and federal activities are important but are clearly insufficient even to address the harm currently affecting the Salton Sea ecosystem, fish and wildlife, the environment, and people as a result of the QSA water transfers and additional recent water cutbacks; they will be grossly inadequate to avoid, or minimize and fully mitigate, the greatly exacerbated crisis that will result from Reclamation's Proposed Action.

VI.B.1. The SSMP 10-Year Plan is insufficient for avoiding or mitigating the harmful impacts of the Proposed Action

As explained in Part II above, the SSMP is lagging extremely far behind in its attempted compliance with the SWRCB Stipulated Order that mandates a specific time-table during 2018-2028 for implementation of habitat creation and dust suppression measures pursuant to the 10-Year Plan. Consequently, it is clear that completion of the 10-Year Plan will not occur by 2028 as required, and in fact the SSMP's activities will fall very far short of creating the minimum required grand total of 29,800 acres of habitat and dust suppression measures that must be finished and operational by then. In addition, the significant funding necessary to build and operate the components of the 10-Year Plan has not been secured, and various other essential

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[120] See, e.g., Lo, M. and Famiglietti, J. S. (2013). Irrigation in California's Central Valley strengthens the southwestern U.S. water cycle. *Geophysical Research Letters* 40: 301–306. https://doi.org/10.1002/grl.50108.

[121] Final Environmental Assessment/Combined Decision Document for the Salton Sea Management Program (SSMP) Phase 1: 10-Year Plan (2024), https://www.spl.usace.army.mil/Missions/Regulatory/Projects-Programs/Salton-Sea-Management-Plan/.

preconditions for executing the plan have not been met. Therefore, full implementation of the 10-Year Plan, even belatedly, is not guaranteed.

Moreover, it is becoming increasingly clear that major components of the 10-Year Plan will not be implemented at all due to a lack of feasibility, and—at best—other much smaller and less effective components are likely to be substituted for them. For example, the original proposed plans for the "North Lake Pilot Demonstration Project" and the "North Lake Project"—the 10-Year Plan's largest projects in the northern portion of the Salton Sea's original footprint that were designed to create aquatic habitat and cover emissive lakebed—will not be implemented, because geotechnical assessments have determined they are infeasible for fundamental reasons, including but not limited to inadequate available water and unsafe levels of seismic risk.[122] Although the SSMP is currently considering alternatives to the original, infeasible projects, it is apparent that none of the potential alternatives will provide the types and extent of habitats previously envisioned, and will also not provide dust suppression across the expanses of exposed Salton Sea lakebed intended to be covered by the projects as originally formulated.[123]

Even if it is assumed that the rest of the 10-Year Plan, apart from the North Lake Pilot Demonstration Project and North Lake Project, will actually be implemented in the future, realistically it appears that will not occur for at least several years beyond 2028. Furthermore, even if a partial 10-Year Plan is belatedly implemented, it will not prevent fish and wildlife, the environment, the climate, and people throughout the Salton Sea region from suffering severe and potentially irreparable harm from the Proposed Action in the future. The limited 10-Year Plan components will not be adequate to restore the habitats necessary for permanently supporting the number and variety of wildlife species, including threatened and endangered ones, originally reliant on the Salton Sea ecosystem—as required by California's Salton Sea Restoration Act.[124] In addition, the partial and belatedly implemented 10-Year Plan will also not be sufficient to prevent a variety of other harmful impacts resulting from the Proposed Action, including but not limited to: (a) large, ongoing emissions of hazardous, toxic, and carcinogenic particulates from exposed lakebed and the deteriorating Salton Sea itself; (b) serious harm to human health across a large region; (c) major greenhouse gas emissions from vast areas of exposed lakebed, the residual exceedingly hypersaline Salton Sea, and relatively small and shallow impoundments; and (d) enormous economic costs resulting from all of the foregoing types of harm.

VI.B.2. The activities of the USACE related to the ISSS Study will not adequately address the harmful impacts of the Proposed Action

The USACE's ISSS Study is a multi-year feasibility study initiated in 2023 that is exploring various proposed options for partial revitalization or full restoration of the Salton Sea. The ISSS Study is currently at a very early stage, and is not fully funded.[125] In addition, as explained in Part II above, the Corps is severely

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[122] Salton Sea Authority Board Meeting, November 20, 2025, agenda item IV.F.1. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/

[123] Ibid.

[124] California Fish and Game Code Chapter 13, Sections 2930 et seq. Restoration of the Salton Sea has become even more crucial recently because the Great Salt Lake is also shrinking, and its ecosystem is also collapsing, from freshwater deprivation. The demise of both lakes would imperil the continued survival of millions of migratory birds, including threatened and endangered species.

[125] Statements by Corrie Stetzel, USACE Water Resources Planner, and Patrick O'Dowd, Executive Director/General Manager of the Salton Sea Authority, during the Salton Sea Authority Board Meeting on November 20, 2025, agenda item IV.C. A video recording of the meeting is available at: https://saltonsea.com/events/salton-sea-authority-board-of-directors-meeting-11-20-2025/. See also: https://www.spl.usace.army.mil/Missions/Civil-Works/Projects-and-Studies/Imperial-Streams-Salton-Sea/; and Salton Sea Authority, February 27, 2026 public comments on the Draft Environmental Impact Statement (EIS) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, available at: https://saltonsea.com/wp-content/uploads/2026/02/SSAComments_CRBPost2026EIS.pdf.

hampered in conducting the ISSS Study because of major jurisdictional constraints, as well as additional self-imposed limitations on the scope and details of its feasibility study. Moreover, it is presently anticipated that—even assuming full funding for the ISSS Study becomes available in the near future—the study will not be completed (to the final stage of the USACE process, which is issuance of a Chief's Report) until the end of calendar year 2029, at which point approval of, and funding for, the recommended project will still need to be sought from Congress in order to accomplish the project.[126] Even assuming Congressional approval and funding for project implementation will ultimately be obtained, subsequently it will likely take years to complete the project and render it fully operational. Therefore, the activities of the USACE related to the ISSS Study will have no effect on the harmful impacts of the Proposed Action until long after 2030.

Furthermore, depending on the details of the USACE project selected for ultimate implementation, that project may or may not actually be effective in very belatedly addressing the harmful consequences of the Proposed Action. As noted above and explained in Part II, the USACE's jurisdictional constraints and self-imposed subject-matter limitations for the ISSS Study may fundamentally cripple the ability of the Corps to design and implement an appropriate, effective, and sustainable project. In addition, if an in-basin project dependent on Colorado River wastewater is selected as the project the Corps will implement, it will suffer from the significant, inherent, and potentially fatal problems described in Part VII.A. below, and consequently it will not avoid, or even effectively mitigate, the harm to people, fish and wildlife, the environment, and the climate that will result from the Proposed Action. In fact, the project may even fail completely because the Colorado River water necessary to sustain it is not available, or for other reasons. On the other hand, even if an ocean water importation plan for full restoration of the Salton Sea is selected for implementation by the USACE as the result of the ISSS Study—which currently appears very unlikely in light of the major jurisdictional constraints affecting the work of the Corps, in combination with the USACE's self-imposed limits on the scope and details of its study—realistically such a project will not be approved, funded, and implemented in time to avert the many types of significant harm that foreseeably may result quickly from the Proposed Action.

There will be devastatingly harmful consequences if the Proposed Action is implemented and the selected USACE project is not ultimately approved and funded by Congress, or the USACE selects an in-basin project for implementation and that project fails because the necessary Colorado River water is not available, or is unsuccessful for other reasons. In that case, the partial, belated, and seriously inadequate 10-Year Plan components would be the only measures implemented for revitalization or restoration of the Salton Sea ecosystem, and the harmful consequences would be dire. The consequences would be even more devastating if the partial 10-Year Plan also fails because of a lack of Colorado River water or for other reasons. People, wildlife, the environment, and the climate will suffer catastrophic harm as the residual deteriorating Salton Sea becomes ecologically useless and hazardous, huge quantities of toxic and carcinogenic particulates chronically spew from the exposed lakebed and the degenerated residual lake, and major quantities of greenhouse gases are emitted from biogenic sources all across the central Salton Basin within the Salton Sea's original footprint. This scenario is entirely foreseeable.

It is incumbent on Interior and Reclamation to identify and commit to implementing effective measures for avoiding, or minimizing and fully mitigating, the harmful Salton Sea Impacts that are reasonably foreseeable consequences of the Proposed Action. Interior and Reclamation must do so in a revised DEIS without making any assumptions about the implementation or effectiveness of the 10-Year Plan or the USACE ISSS Study.

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[126] Statements by Corrie Stetzel and Patrick O'Dowd during the November 20, 2025 Salton Sea Authority Board Meeting, supra. The USACE and the Salton Sea Authority currently anticipate, as explained by Ms. Stetzel and Mr. O'Dowd, that the project selected for implementation by the USACE as a result of the ISSS Study will be authorized by Congress in the 2030 cycle of the Water Resources Development Act, and subsequently funded by an appropriations bill.

VII. To avert devastating consequences of the Proposed Action, permanent restoration of the Salton Sea is necessary

In order to avoid, or effectively minimize and fully mitigate, the cumulative and significant harmful impacts of the Proposed Action, it is essential for Interior and Reclamation to develop and undertake actions that will result in permanent restoration of the Salton Sea ecosystem. I suggest this should be accomplished as part of the Post-2026 Program, in consultation or collaboration with the U.S. Army Corps of Engineers and other federal and state agencies as appropriate.[127] As explained above, the ongoing ISSS Study by the Corps is severely hampered by fundamental jurisdictional constraints, as well as by self-imposed limitations related to reliance on the SSMP's inadequate and scientifically unsound Long-Range Plan,[128] including but not limited to reliance on the biased and fatally flawed analysis, findings, and conclusions of the U.C. Santa Cruz panel[129] that the SSMP incorporated into the Long-Range Plan. Therefore, in order to effectively address the harmful consequences of the Proposed Action, it is necessary for Interior and Reclamation to engage with the USACE and other federal and state agencies to ensure that appropriate and permanent restoration of the Salton Sea is accomplished. If Interior and Reclamation need additional authorities in order to perform the necessary activities, they should immediately pursue obtaining those authorities.

Numerous long-term plans have been proposed to address the Salton Sea crisis and revitalize or restore the lake and the Salton Sea ecosystem in different ways and to varying degrees. The proposed plans fall into two general categories: (a) in-basin plans that use only the water already available as inflow into the central Salton Basin, nearly all of which is a shrinking supply of Colorado River wastewater,[130] to create impoundments on the exposed Salton Sea lakebed for habitat and recreation; and (b) ocean water importation plans, which propose to refill the Salton Sea and restore its ecosystem either by using desalinated ocean water (imported from either the Gulf of California or the Pacific Ocean), or by using imported ocean water that is not desalinated, in combination with some sort of outflow mechanism to prevent salts from continuing to accumulate in the lake.[131]

VII.A. In-basin restoration options

1. Proposed in-basin restoration plans, which are more accurately described as partial revitalization options, all rely on huge amounts of Colorado River wastewater flowing into the central Salton Basin to fill large earthen impoundments constructed on the Salton Sea's exposed lakebed to create habitat areas and recreational opportunities. The sizes and configurations of the impoundments vary from one proposed in-basin plan to another; however, all plans use excavated lakebed sediments to construct the impoundments and other features such as levees and causeways, and all plans use Colorado River wastewater to fill the impoundments. In-basin plans also employ dust mitigation measures on other portions of the exposed lakebed (e.g., deep

[127] For example, it may also be appropriate or necessary for the International Boundary and Water Commission to be involved.

[128] See my detailed public comments submitted to the CNRA and SSMP regarding the 2023 SSMP Draft Long-Range Plan, available at: https://doi.org/10.13140/RG.2.2.33676.37768.

[129] See my detailed public comments submitted to the CNRA and SSMP regarding the work of the U.C. Santa Cruz panel, available at: https://doi.org/10.13140/RG.2.2.30320.93448.

[130] As Interior and Reclamation are aware, a relatively small portion of the inflow into the central Salton Basin comes from local tributaries, groundwater, and stormwater. The rest is Colorado River wastewater, most of which derives from Imperial County's agricultural use of IID's allotment of the river's water, as noted above. Additional inflow is wastewater from agricultural, municipal, and industrial use of Colorado River water in the Coachella Valley and northwest Mexico.

[131] For purposes of these comments, "ocean water importation," "seawater importation," "the use of ocean water" to restore the Salton Sea, and other similar phrases mean any restoration plan using either of those two general approaches. Many ocean water importation plans of those two types have been proposed during the past few decades.

furrowing to inhibit airborne movement of particles), and they include at least one large brine sink in the central basin that is incapable of supporting fish or wildlife.

2. The dependence of in-basin plans on the continued availability of enormous volumes of Colorado River wastewater flowing annually into the central Salton Basin in perpetuity is exceedingly problematic if not completely untenable.[132] Worsening climate change, significantly decreasing Colorado River streamflow,[133] and tightening restrictions on use of the river's water will jeopardize the existence of the inflow amounts required by in-basin plans, and will threaten the efficacy and sustainability of all such plans. Consequently, all in-basin plans will face a substantial risk of failure if implemented. In the event that a very costly in-basin plan is ineffective or becomes inoperable because of water constraints, enormous amounts of money will have been wasted, and the devastating consequences for wildlife, people, the environment, and the climate will be tantamount to the dire impacts of a no-action scenario. Although permanent restoration conceivably could be accomplished using an in-basin plan if a very large annual amount of Colorado River water is specifically and irrevocably allocated to the Salton Sea, that approach is clearly infeasible because of the many legitimate and competing demands for the river's over-allocated and declining water supply.

3. In addition to their problematic and likely unsustainable dependence on the use of Colorado River water, all in-basin plans suffer from many other significant inherent flaws that render them seriously inadvisable and undermine their viability. For example:

    a. Wastewater containing dangerous pollutants will be relied upon as the sole water source for impoundments to be used as habitat and for recreational activities, exposing both wildlife and people to known and serious risks of harm. The hazardous, toxic, and carcinogenic pollutants in the water include, but are not limited to, pesticide residues (from both banned legacy pesticides such as DDT and ones in current use), heavy metals (e.g. arsenic, lead, chromium, nickel, and cadmium), polychlorinated biphenyls (PCBs), components of untreated wastewater crossing the international border from Mexico (potentially including pathogens), various industrial chemicals released from Mexican factories, microcystins from harmful algae blooms, and elevated levels of selenium.

    b. Lakebed and deltaic sediments contaminated with hazardous, toxic, and carcinogenic substances, including but not limited to the ones noted above, will be excavated and used to create and maintain impoundments, dikes, levees, islands for wildlife to nest and loaf, and other earthen structures such as causeways and embankments to be used by people (e.g., for driving, hiking, birdwatching, fishing, and launching boats). Through a variety of exposure pathways, the contaminants in sediments will pose known risks of significant harm to both wildlife and people.

    c. The essential components of in-basin plans, including but not limited to impoundments, dikes, levees, causeways, and other infrastructure, will be constructed on the Salton Sea lakebed on top of or adjacent to significant active faults and seismic zones. In the event of a large earthquake (which is highly likely to happen during the life of a long-term restoration plan), major ground motion and extensive liquefaction of sediments in the Salton Sea footprint will occur, and will likely cause critical infrastructure built on top

[132] The amount of inflow required by in-basin plans varies among the proposed restoration concepts. The minimum quantity necessary for the in-basin concept with the smallest water requirement, taking into account the effects of climate change in the coming decades, is approximately several hundred thousand acre-feet per year. Other proposed in-basin plans require, roughly, as much as double that amount. Importantly, the suggested concepts with lower water requirements necessarily entail leaving much greater expanses of lakebed exposed, and they will therefore result in significantly larger emissions of hazardous fugitive dust and biogenic greenhouse gases from the exposed lakebed on an ongoing basis.

[133] For example, see the studies cited in footnotes 11 and 12.

of the lakebed to be incapacitated and destroyed. Levees, dikes, and causeways will be cut by shearing forces causing co-seismic displacements of as much as 6 meters,[134] impoundments will collapse, and access roads on the lakebed will be disabled. Such a dangerous scenario will pose major threats to public safety, and will necessitate rebuilding the project—which might not even be feasible.

d. Huge quantities of dangerous particulates (PM_{10} and $PM_{2.5}$) in the form of dust and aerosol droplets containing hazardous, toxic, and carcinogenic components will be emitted from vast areas of lakebed that will be left exposed by in-basin plans, and will also be released from the residual, degraded Salton Sea. The chronic emissions will negatively affect regional air quality and endanger the health of roughly 600,000 people throughout the surrounding region (and potentially a significantly greater number, including the populations of western Riverside County and Los Angeles County in California, Yuma County in Arizona, and the city of Mexicali in Mexico).

e. Major quantities of greenhouse gases—including carbon dioxide, methane, and nitrous oxide—are likely to be emitted on an ongoing basis for the foreseeable future from exposed Salton Sea lakebed and other features of in-basin restoration plans.[135] The quantities of biogenic GHG emissions involved could ultimately be so large that California's plan to attain net-zero carbon emissions will be derailed, and climate change will be worsened.[136]

f. The economic cost of the biogenic GHG emissions (SC-GHG) associated with in-basin plans that leave vast areas of lakebed exposed and include other components that are also likely to emit major quantities of GHGs on an ongoing basis is likely to reach at least scores of billions of dollars during the life of a long-term restoration plan, and could soar far higher than that.[137]

g. The inhabited region adjacent to the Salton Sea—the area that will be most negatively impacted if an ineffective and/or unsustainable in-basin restoration plan is implemented—encompasses disadvantaged populations bearing major burdens of environmental injustice.[138] The people living and working there are already adversely

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[134] See, e.g., Kyriakopoulos, C., et al. (2019). Dynamic Rupture Scenarios in the Brawley Seismic Zone, Salton Trough, Southern California. *JGR Solid Earth* 124(4), 3680-3707, https://doi.org/10.1029/2018JB016795.

[135] See the report and other information cited in footnote 100 above.

[136] A rough ballpark estimate of the total quantities of GHG emissions involved is the amount calculated in the Supplementary Information referenced and described in footnotes 100 and 105 above—i.e., 26 million metric tons of CO_2 annually.

[137] The relevant calculation is performed using estimated emissions amounts and the data in Appendix A, section A.5, Table A.5.1 of the following report: U.S. EPA (2023). Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances, https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf. Although in 2025 President Trump instructed federal agencies to stop taking into account the economic damage caused by climate change unless required to do so by statute, no new guidance documents have been published by EPA and the scientific validity of the agency's 2023 Report on the Social Cost of Greenhouse Gases remains well-established.

[138] The Council on Environmental Quality's Climate and Environmental Justice Screening Tool (CEJST) identifies the locations and extent of disadvantaged communities, including but not limited to Federally Recognized Tribes, and shows that the entire Salton Sea region consists of such populations. CEQ developed the CEJST as required by Executive Order 14008. It is a geospatial mapping tool that federal agencies have been directed to use "to identify disadvantaged communities. These communities have been marginalized by society, overburdened by pollution, and underserved by infrastructure and other basic services. The CEJST uses publicly-available, nationally-consistent datasets [that] are indicators of burdens that disadvantaged communities face. These burdens are related to climate change, the environment, health, and economic opportunity." (Instructions to Federal Agencies on Using the Climate and Environmental Justice Screening Tool," CEQ, Executive Office of the President of the United States, January 2023, page 2.) A memorandum

affected by hazardous particulate emissions, hydrogen sulfide irruption events, harmful blooms of toxic algae, and other serious problems caused by shrinkage and deterioration of the Salton Sea related to the QSA water transfers.[139] The serious concerns of those communities include, but are not limited to, significant and disproportionate pulmonary illness associated with chronic inhalation of dangerous particulates being emitted from increasingly exposed Salton Sea lakebed. The proximity of disadvantaged populations to the Salton Sea ensures they will be subjected to worsening harm as the lake continues to shrivel and the ecosystem deteriorates further toward complete collapse.[140] Because of the fundamental limitations and problems intrinsic to all in-basin restoration plans, increased morbidity and mortality in communities near the Salton Sea will occur if such a plan is implemented.[141]

VII.B. Ocean water importation options

1. Proposed ocean water importation plans entail refilling the Salton Sea and restoring a robust aquatic ecosystem capable of supporting the number and diversity of species originally reliant on the huge lake. Pursuant to such a plan, millions of birds and hundreds of millions of fish could again be sustained by the Salton Sea. In broad terms, the proposed concepts would accomplish restoration by utilizing either: (a) desalinated seawater from the Gulf of California or Pacific Ocean imported into the Salton Basin; or (b) imported seawater that is not desalinated, in combination with some sort of outflow mechanism to prevent salts from continuing to accumulate in the lake. Various ocean water importation plans of these two general types have been proposed, some of which involve recent technological advancements.

2. An ocean water importation plan would avoid all of the many serious problems afflicting in-basin plans, including all of the important difficulties noted in Part VII.A above. Utilizing ocean water to refill the Salton Sea and reestablish its ecosystem is the only approach that can break the tight linkage between Colorado River water use and sustenance of the Salton Sea, achieve permanent restoration of the lake, and protect both wildlife and people from significant harm. Specifically:

    a. An ocean water importation plan would fully restore essential Salton Sea habitat to conserve hundreds of species that will otherwise face grave threats to their survival. Moreover, restoring the Salton Sea with ocean water would avoid the substantial ongoing risks to both wildlife and people posed by in-basin plans that necessarily rely

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from the Executive Office of the President to the heads of federal executive departments and agencies dated January 27, 2023 stated that federal agencies should immediately start using the CEJST to identify geographically defined disadvantaged communities for purposes of analyzing environmental justice issues. The Climate and Environmental Justice Screening Tool was previously available online at https://screeningtool.geoplatform.gov/en/#8/33.045/-115.98 but was removed by the Trump administration. Subsequently the screening tool was restored online by the Environmental Data and Governance Initiative, and is available at https://public-environmental-data-partners.github.io/j40-cejst-2/en/#3/33.47/-97.5.

[139] See the references cited in footnotes 30, 31, 32, 33, and 34 above

[140] As discussed previously, one significant concern is the fact that inhabited tribal reservation lands of the Torres Martinez Desert Cahuilla Indians adjoin portions of the Salton Sea's exposed lakebed. There are also other Tribes in the Salton Sea region.

[141] For example, in addition to the research highlighted in footnotes 30, 31, 32, 33, and 34, another study concluded: "Between 1998 and 2014, the shrinking Salton Sea was associated with PM2.5 changes that increased lower respiratory mortality outcomes by…1.4/yr.–15.6/yr. in aggregate… [C]hanges in the amount of exposed lake bed around the Salton Sea are responsible for $13.2–$147.3 million per year in lower respiratory mortality costs associated with PM2.5 exposure… [E]ach one-foot drop in lake elevation creates, on average, $151.5 million in respiratory mortality costs in the Salton Sea counties…" (Jones, B.A. and Fleck, J. (2020). Shrinking lakes, air pollution, and human health: Evidence from California's Salton Sea. *Science of the Total Environment* 712(22):136490, http://dx.doi.org/10.1016/j.scitotenv.2019.136490.)

on impoundments constructed of contaminated sediments and filled with polluted wastewater.

b. Use of seawater for full Salton Sea restoration would permanently prevent the emission of dangerous fugitive dust from exposed lakebed. Instead of blowing throughout the surrounding area and chronically jeopardizing human health, the hazardous constituents in lakebed sediments would remain buried.

c. Implementation of a seawater importation plan would facilitate achieving sustainability of the Colorado River system. Such a plan would provide the restored Salton Sea with an enduring source of water independent of the Colorado River that will be immune to the future vagaries of climate change and the impacts of worsening aridification, and will be unaffected by cuts in Colorado River water allocations. If required pursuant to the Post-2026 Program, water rights holders in the Salton Trough could substantially reduce their use of the Colorado River's water while not causing harm to the Salton Sea, to the lake's wildlife, or to public health.[142]

d. Because inexhaustible ocean water would be used as the restored Salton Sea's water supply, the lake would also be unaffected by other foreseeable circumstances that will substantially reduce future inflows of Colorado River wastewater into the central Salton Basin. For example, the Salton Sea would suffer no adverse impacts as a result of water-use efficiency improvements implemented by Colorado River stakeholders in the Salton Trough, or because of significantly increased recycling and reuse of Colorado River wastewater in the region, or due to entirely consumptive use of large quantities of Colorado River water by anticipated commercial-scale lithium extraction operations in the Salton Basin that will release no wastewater. In contrast, all of those scenarios could fatally undermine an in-basin restoration plan.

e. Using ocean water to accomplish full and permanent Salton Sea restoration would enhance the well-being of communities across the adjacent region, rather than subjecting them to a variety of serious and ongoing health hazards and significant socioeconomic harm.

f. Restoring the Salton Sea with ocean water and reestablishing the lake's ecological, biological, and biogeochemical functions would likely serve to sequester significant amounts of carbon in submerged lakebed sediments, and yield net-zero or net-negative GHG emissions. In contrast, in-basin restoration approaches would likely result in very large quantities of biogenic greenhouse gases being emitted on an ongoing basis, and would impose enormous economic costs related to the damaging climate impacts of those emissions.

VII.C. Interior and Reclamation must take action to ensure that an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea is expeditiously implemented

Implementation of Reclamation's Proposed Action in combination with failure to implement an appropriate, safe, effective, and sustainable long-term restoration plan for the Salton Sea will cause devastating impacts on people, fish and wildlife, the environment, and the climate. Many of the harmful impacts will be irreversible. Failure to implement an appropriate, safe, effective, and sustainable long-term restoration plan for the Salton Sea may occur because: (a) federal and state agencies adopt a no-action or piecemeal minimal-action approach regarding restoration, and no long-term plan for permanent restoration is carried

[142] Also, notably, the various proposed restoration plans involving desalination of seawater from the Gulf of California typically include substantial benefits for Mexico that could help offset the difficulties that country may experience due to future reductions in Colorado River water allocations.

out; or (b) an in-basin long-term plan is selected for implementation but it cannot operate as intended, is otherwise ineffective and/or unsafe, and/or it cannot be sustained over the long term. The problematic scenario (b) may materialize as a consequence of various foreseeable factors—including, but not limited to, the fundamental problem that there is a very high probability the Colorado River water supply necessary for operation of an in-basin plan will not exist in the future, and perhaps even the near future.

Therefore, I suggest it is incumbent on the Secretary of Interior—as Watermaster for the Lower Basin, and the head of the cabinet-level department in charge of, inter alia, management of federal lands and natural resources, stewardship of Tribal lands, and oversight of major agencies involved in and responsible for a panoply of Colorado River and Salton Sea issues—along with the Acting Commissioner of Reclamation, the head of the agency responsible for implementing management of the Colorado River's water, to urge the USACE (as well as the Salton Sea Authority and the California Department of Water Resources, the non-federal sponsors of the ISSS Study), not to move ahead with any long-term plan for Salton Sea restoration that is dependent on large amounts of Colorado River water continuing to flow into the central Salton Basin for decades to come. In doing so, the Secretary and the Acting Commissioner should emphasize that in light of the truly dire water shortage affecting the Colorado River, which is very likely to become even more severe in the coming years, to proceed with any in-basin plan for Salton Sea restoration that is dependent on Colorado River water would be to accept a very high risk that the project will fail because the water necessary to operate it will not exist. The devastating consequences of such a failure will be tantamount to having selected a no-action approach to the Salton Sea crisis, except that billions of dollars will have been wasted on attempting to implement a doomed project. The Secretary and Acting Commissioner should also urge the USACE to fully evaluate the feasibility of all reasonable options and proposals for using ocean water to accomplish permanent Salton Sea restoration. The evaluated options and proposals should include, but should not be limited to, proposals that were originally submitted to the U.C. Santa Cruz panel but were not included in the SSMP's Long-Range Plan because the U.C. Santa Cruz panel failed to evaluate them in a full, scientifically sound feasibility study, even though the panel was contractually required to do so. If the USACE does not have the requisite jurisdiction to properly accomplish this essential feasibility study of options and proposals to use ocean water to fully restore the Salton Sea, or is unable or unwilling to conduct it for other reasons, then Interior and Reclamation should promptly commence the necessary study and expedite it. If Interior and Reclamation do not currently have the legal authorities needed to do so, they should expeditiously obtain those authorities.

VIII. Failure to properly address Salton Sea issues and Salton Sea Impacts in the DEIS is counter-productive and short-sighted, and will adversely affect post-2026 management of the Colorado River

On June 6, 2025, during the Annual Colorado Law Conference on Natural Resources at the University of Colorado in Boulder, Scott Cameron—who was then the Acting Assistant Secretary for Water and Science in the Department of the Interior, but is now the Acting Commissioner of the Bureau of Reclamation—made clear Interior's and Reclamation's intention to omit from the DEIS any analysis of the Salton Sea crisis and Salton Sea Impacts.[143] A member of the audience asked Mr. Cameron, "In the post-2026 plan, how are we going to account for the fact reductions in IID's use of Colorado River water could reduce water in the Salton Sea?"[144] Mr. Cameron responded (emphasis added), "So that's a real, legitimate concern, and I know there's a lot of interest at the state level, and there are federal equities in terms of national wildlife refuges, you know, around the Salton Sea, and associated with IID project, of course. **The short answer is we are not directly taking on the Salton Sea as part of the NEPA process**, at least in terms of what you should expect to see in our Draft EIS alternatives. If the public comment period generates some issues regarding the Salton Sea that we think we

[143] A video recording of Mr. Cameron's statements in Session 5 of the conference is available online at: https://www.youtube.com/watch?v=lAmiWGzy85E&list=PLwFq2GL-i5UiQ1Gih81nnqhH0gR1eXVh7&index=5

[144] Id. at 17:59 to 18:16.

need to address, then we will address them. But, **quite frankly, we've got enough problems worrying about Lake Mead and Lake Powell than to try to figure out how to solve the Salton Sea at the same time."**[145]

While Mr. Cameron's candor was appreciated, the choice by Reclamation and Interior to avoid considering the Salton Sea crisis and the Salton Sea Impacts of the Proposed Action when making decisions about post-2026 Colorado River management is insupportable under applicable law as explained above. Moreover, failing to address Salton Sea issues and Salton Sea Impacts that are directly related to post-2026 Colorado River management is both counter-productive and short-sighted with regard to the need for such management to sustain the river system and to support more than 40 million people and millions of acres of farmland reliant on the river.

In light of Acting Commissioner Cameron's background in both biology and natural resources economics, the details of the Salton Sea crisis and its consequences for fish, wildlife, the environment, and people must be clear to him. Certainly, he understands that IID cannot reduce Imperial County's use of Colorado River water without substantially worsening the Salton Sea's crisis and exacerbating the resulting harm to fish, wildlife, the environment, and people. The Acting Commissioner surely also understands that, in light of the nature and severity of the Colorado River's own water-scarcity crisis and the projections for worsening water shortages in the future, any proposed restoration plan for the Salton Sea that relies throughout the coming decades on continuing inflow of very large quantities of Colorado River water is unsustainable and untenable.

The use of inexhaustible ocean water to restore the Salton Sea, and to sever the tight linkage between IID's use of Colorado River water and the fate of the Salton Sea and its ecosystem, is the only approach that will actually solve the Salton Sea crisis and permanently avoid, or minimize and fully mitigate, the otherwise dire Salton Sea Impacts of the Proposed Action, *while simultaneously relieving tremendous pressure on the Colorado River system.* For example, if ocean water is used to restore the Salton Sea, IID could reclaim and reuse a substantial portion of the District's Colorado River wastewater for agriculture without causing devasting impacts on the Salton Sea. Such an approach could enable IID to reduce the amount of water the District draws directly from the river while also continuing to sustain the extremely important agricultural industry and associated economy in the Imperial Valley that supplies most of the vegetables consumed in the United States from late fall through spring.[146] But if a restoration plan for the Salton Sea that depends on continued inflow into the central Salton Basin of large quantities of Colorado River wastewater is the approach adopted by federal and state agencies, IID is highly unlikely to proceed with any water conservation measures involving recycling and reuse of a substantial portion of the District's wastewater (and is unlikely to proceed with any other water conservation actions, beyond the measures already undertaken, that substantially reduce the District's wastewater), because of the devastating impacts on the Salton Sea, fish and wildlife, and people throughout the surrounding region that would be the unavoidable consequences of such actions.

The Salton Sea crisis has resulted, inevitably, from construction and use of the 20th-century infrastructure that Reclamation utilizes to control the Colorado River and exhaustively distribute its water, and from implementation of Reclamation's 21st-century river-management decisions. In order to address both the Salton Sea crisis and the Colorado River crisis, it is necessary for Interior and Reclamation to consider carefully the ways in which the issues are intertwined, and to undertake an integrative approach that will actually solve the intractable problems involved. Continuing to resort to the use of Band-aids to postpone undertaking complex analyses and delay making difficult decisions is counter-productive, short-sighted, and unsustainable; and, in the long run, such a Band-aid approach will only serve to worsen the already severe problems affecting both the Salton Sea and the Colorado River.

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[145] Id. at 18:17 to 19:07.

[146] If Interior and Reclamation, and/or Colorado River water rights holders in other locations, were to fund the construction and operation of appropriate wastewater recycling facilities in Imperial County, conceivably IID might seriously consider reclaiming and reusing its wastewater in order to decrease the amount of Colorado River water the District draws directly from the river. However, please note that I do not speak for IID in any way.

IX. Conclusion and Recommendations

In the Post-2026 Program, Interior and Reclamation have a responsibility to manage the Colorado River system in ways that sustainably address the river's water-scarcity crisis. But, in doing so, those agencies must take into account the fact that for too long the Salton Sea ecosystem, the fish and wildlife dependent on it, and communities throughout the region surrounding the lake have improperly been an afterthought, or entirely ignored, in Colorado River management decisions; and they have therefore borne the brunt of many harmful consequences stemming from those decisions. That unjust, disproportionally injurious, and unlawful situation must not continue.

The DEIS does not satisfy applicable legal requirements. The Proposed Action will cumulatively and significantly exacerbate the harm that has already been inflicted on the Salton Sea and its ecosystem, fish and wildlife, the regional environment, the climate, and more than half a million people who live and work in areas adjacent to the lake—including Tribes to whom Interior and Reclamation owe federal Indian trust responsibilities. Yet the DEIS wrongly fails to evaluate the many foreseeable and significant Salton Sea Impacts of the Proposed Action, and also fails to suggest effective mechanisms for avoiding those impacts or for minimizing and fully mitigating the harm that is impossible to avoid. If Reclamation proceeds to implement the Proposed Action as the Post-2026 Program, and an appropriate, safe, effective, and sustainable plan for restoration of the Salton Sea ecosystem is not also implemented, there will be catastrophic and irreversible consequences for fish, wildlife, and people.

For all of the foregoing reasons, I respectfully suggest that Interior and Reclamation should promptly undertake the following essential actions:

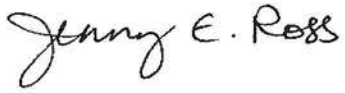
1. Formulate and issue a revised DEIS that:
    a. Includes the improperly omitted analyses of Salton Sea issues and Salton Sea Impacts, and identifies and commits to implementing effective measures to avoid, or minimize and fully mitigate, the harmful impacts of the Proposed Action on fish, wildlife, the regional environment, the climate, and people throughout the Salton Sea area, including but not limited to Tribes.
    b. Includes a detailed evaluation of Reclamation's options and the agency's preferred action alternative for addressing the foreseeable and potentially impending scenario in which one or both major mainstream reservoirs drop to critically low levels, the integrity of Reclamation's infrastructure is in imminent danger, the ability of that infrastructure to move water downstream to the Lower Basin states and Mexico is in jeopardy, and public health and safety are gravely threatened.
2. Immediately contact the USACE and engage in consultation and collaboration regarding options for implementing an appropriate, safe, effective, and sustainable plan for restoration of the Salton Sea ecosystem. Specifically, Interior and Reclamation should urgently discuss the following issues with the USACE:
    a. The water-supply crisis affecting the Colorado River is occurring because climate warming is adversely affecting the Basin's hydrology. The ongoing situation is genuinely dire and potentially catastrophic, and it is anticipated that Colorado River water scarcity will worsen considerably in the coming decades.
    b. If the ISSS Study recommends and proceeds to implement an in-basin project that is reliant on continued inflow of large quantities of Colorado River water, it is very likely that the project will not be sustainable—and foreseeably may fail in the near future—because the necessary water will not be available.
    c. A restoration plan for the Salton Sea and its ecosystem that utilizes ocean water importation instead of Colorado River water would: avert devastatingly harmful consequences for fish,

wildlife, and people that will otherwise occur because of the Proposed Action; potentially relieve substantial pressure on the Colorado River system by enabling Salton Trough water users to reclaim and reuse their Colorado River wastewater; and facilitate successful implementation of the Post-2026 Program to protect and sustain the Colorado River and the infrastructure used to manage it, and to safeguard public health and safety.

3. Expeditiously obtain whatever legal authorities are necessary for Interior and Reclamation to proceed with implementation of an appropriate, safe, effective, and sustainable restoration plan for the Salton Sea and its ecosystem that is not reliant on Colorado River water, and that will avoid or minimize and fully mitigate the harmful impacts of the Proposed Action, in the event that the USACE will not be proceeding with such a plan (either because of jurisdictional constraints or for other reasons).

Thank you for considering these comments.

Sincerely,



Jenny E. Ross, J.D.
Research Affiliate, Stout Research Center[147]

cc:

Gavin Newsom, Governor of California
Doug Burgum, Secretary of the U.S. Department of the Interior
Scott J. Cameron, Acting Commissioner of the Bureau of Reclamation
Alex Padilla, U.S. Senator for California
Adam Schiff, U.S. Senator for California
Wade Crowfoot, California Secretary for Natural Resources
Yana Garcia, California Secretary for Environmental Protection
Karla Nemeth, Director of the California Department of Water Resources
Raul Ruiz, M.D., U.S. Congressman for the 25th District of California
Steve Padilla, California State Senator, District 18
Jeff Gonzalez, California Assemblymember, District 36
Andrea Travnicek, Assistant Secretary for Water and Science, U.S. Department of the Interior
Joe Shea, Assistant Secretary for Salton Sea Policy, California Natural Resources Agency
Jeremy J. Brooks, Salton Sea Program Manager, Bureau of Reclamation
Susie Ming, USACE Project Manager, Imperial Streams Salton Sea Feasibility Study
Joaquin Esquivel, Chair of the California State Water Resources Control Board
G. Patrick O'Dowd, Executive Director/General Manager, Salton Sea Authority
Jessica Neuwerth, Executive Director, Colorado River Board of California
J.B. Hamby, Chair, Colorado River Board of California
James Newcomb, SSMP Lead and Assistant Deputy Director, California Dept. of Water Resources

[147] As a Research Affiliate of the Stout Research Center, I study a variety of scientific issues related to the Colorado River system, the Salton Trough, and the past, present, and future of the Salton Sea, including Pliocene-to-Holocene geology, paleontology, hydrology, climatology, and ecology. These comments are submitted in my personal capacity and not on behalf of the Stout Research Center.



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FROM:

Jenny E. Ross
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P.O. Box 10037
Truckee, CA 96162

TO:

The Honorable Doug Burgum
Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, D.C. 20240



Debi Roundtree

debraroundtree@icloud.com
928-640-1933

Letter #: 3492

Date Received: 2/26/2026

Sender Names: 3460: Pat Rowell

Emails: 3460: rowellpat3@gmail.com

Organizations:

Subject: Colorado River Protection

DOI - . The Bureau has not put forth its 'preferred alternative' in the document, nor has it given Tribes, impacted communities, and the public a meaningful chance to comment on its recommendation before a final decision is made. If the Bureau does not include its "preferred alternative" in its Draft EIS and waits to do so in its final action, the public will have no opportunity to comment on the actual proposal the Bureau recommends. The Colorado River provides drinking water for 40 million people, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems. With such impact the Colorado River must be treated as a critical resource.The Basin is experiencing:Record-low reservoir levelsIncreasing salinity and pollution risksCollapsing aquatic habitatsRising temperatures and reduced snowpackGrowing threats to safe, reliable water suppliesThis EIS must reflect the reality of climate-driven water scarcity and prioritize clean water protections, ecosystem health, and equitable solutions, not simply divide up a shrinking supply nor cower to the demands of corporations or the Trump administration. Your agency represents the wellbeing of America and the American people. Make your document reflect that committment.

Letter #: 4802

Date Received: 2/28/2026

Sender Names: 4768: Stacey Royce

Emails: 4768: Stacey.Royce@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, The Colorado River is being systematically drained and poisoned by Big Ag and Big Tech, turning our shared public resource into their private profit machine. Industrial agriculture consumes 70% of the river's water for unsustainable monocrop farming that depletes soil and contaminates water with pesticides. Meanwhile, data centers and AI facilities are siphoning millions of gallons to cool servers that power their surveillance capitalism empire. This isn't just environmental destruction--it's theft. These corporations treat our public lands as their personal piggy banks, extracting wealth while leaving communities to face water scarcity, ecological collapse, and economic ruin. The river doesn't belong to corporate boardrooms; it belongs to the people of the Southwest who depend on it for drinking water, agriculture, and cultural heritage. The Bureau must use its authority to push the Basin states to reach a joint agreement that accepts the need for mandatory conservation measures limiting corporate water abuses. With the Colorado River significantly overstretched, every environmental analysis and plan for the future must consider how the River's resources are being used. The overuse of the Colorado River by big agribusiness and technology corporations - amid already record-low water levels and drought - has serious consequences that threaten accessible drinking water for 40 million people. I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Stacey Royce 1704 SE Ankeny St Portland, OR

Comments on Draft Environmental Impact Statement for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

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303-482-7426

Thank you the opportunity to comment on the draft environmental impact statement for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (DEIS). It is clearly the result of an enormous amount of work, and detailed analysis.

The following comments are intended to improve the final EIS and lead to a Colorado River management plan that will allow the Bureau of Reclamation to operate Lake Powell and Lake Mead in ways that meet the needs of stakeholders in the Upper and Lower Basins, while improving the environmental quality of the river system.

Purpose and Need for Action

The proposed federal action is intended to result in new guidelines for operating Lake Powell and Lake Mead for about the next 20 years to achieve several objectives, including providing a greater degree of predictability about annual water availability, and establishing additional mechanisms for the delivery of water supplies from the Colorado River.[1] In order to achieve these objectives, it is necessary to modify Glen Canyon Dam, which has limited ability to release water when Lake Powell reaches minimum power pool or lower. This is a single point of failure that poses an unacceptable risk to the functioning of the entire river system. The DEIS fails to address Glen Canyon Dam's stranglehold on the river system, and the final EIS must provide options for modifying the dam in order to achieve the Bureau's stated objectives.

The DEIS's finding that "long-term drought and low-runoff conditions are expected in the future"[2] is consistent with the Bureau's recent conclusion that the persistent drought is "one of the driest periods in the last 1,200 years."[3] The Bureau's most recent 24-month forecast of the elevations of Lake Powell and Lake Mead found that under "most probable inflow" conditions, Lake Powell will fall to its lowest level this century by July 2026. Assuming "probable minimum inflow," Lake Powell will fall to minimum power pool — elevation 3,490 — in late July 2026, and remain there or lower through 2027, reaching as low as 3,450 in March 2027.[4]

In addition, the agency's February forecast estimates that under "most probable inflow" conditions, Lake Mead would drop below elevation 1,050 in May 2027. If conditions do not improve by the agency's August forecast, it will result in a Level 2 Shortage Condition, triggering mandatory reductions in water use in Arizona, California, Nevada, and Mexico under the Lower Colorado River Basin's Drought Contingency Plan (DCP).[5]

Due to Glen Canyon Dam's physical limitations, when the elevation of Lake Powell reaches minimum power pool or lower, the only way to release water from the dam is through its four river outlet works.[6] To protect the structural integrity of the outlet works, the Bureau's interim guidance for operating Glen Canyon Dam includes maximum flow through each outlet at varying elevations of Lake Powell. At minimum power pool, the interim maximum flow per outlet is 3,185 cubic feet per second (cfs); 2,711 cfs when the elevation reaches 3,450.[7]

The Bureau has determined that only three outlet works would likely be available simultaneously due to maintenance and inspection requirements.[8] Assuming three river outlet works operate at full capacity, at minimum power pool, they would cumulatively release 9,555 cfs. At that rate, uninterrupted for an entire year they would release about 6.9 million acre-feet (MAF). At elevation 3,450 releases would total about 5.9 MAF.[9] Assuming Glen Canyon Dam could achieve the theoretic maximum

releases at minimum power pool, less water would flow from Lake Powell downstream to Lake Mead than any time this century. Releases restricted by elevation 3,450, would total a MAF less than any year this century.[10]

Based on the dam's design, and previous experience with releasing water through the river outlet works, it is highly unlikely they will operate at maximum capacity for an extended period. The Bureau's Technical Service Center determined "there is nothing to indicate the river outlet works were intended for long-term conveyance use at low reservoir water levels,"and "reservoir elevations below minimum power pool were not anticipated."[11] The Service Center has recommended to "**not** rely on the river outlet works as the sole means for releasing water from Glen Canyon Dam," below minimum power pool.[12] (emphasis added)

Previous high-capacity use of the outlet works for only 72-hours caused structural damage, which required nine months to repair. Despite the remedial effort, the Bureau concluded the repairs will not prevent future damage.[13] Moreover, the agency has acknowledged that using the outlet works exclusively would "create a risk of water supply interruptions" to those who depend on Lake Powell.[14] If the annual amount of water let out from Lake Powell is restricted to the dam's outlet works, Lake Mead could reach a Level 3 Shortage Condition, resulting in even larger reductions in Lower Basin water consumption.

Proposed Federal Action: Alternatives

A fundamental deficiency in the DEIS is the lack of any alternative that would remedy the design flaw that limits the amount of water that can be released from Glen Canyon Dam when Lake Powell's elevation falls to minimum power pool or lower. The dam's limitations are well known to the agency. It has been evaluating several modifications to the dam that could alleviate concerns related to water releases since at least February 2023,[15] and the Bureau is expected to complete an "appraisal study" for

modifying the dam by the end of 2026. The study will include alternatives to releasing water from means other than the river outlet works.[16]

Despite the ongoing evaluations of how to modify Glen Canyon Dam, the Bureau's own guidance to not rely solely on the river outlet works, and known consequences doing so, the DEIS failed to include an alternative that includes making structural changes to the dam, which would allow more water to pass through or around the dam, and reduce the risk of supply disruptions to the Lower Basin. I urge the agency to include options for modifying the dam in the final EIS.

Potential Environmental Effects

The DEIS acknowledges that "it is not possible to confidently assign probabilities to specific future conditions," even though the agency's "significant investments" have resulted in "only limited improvements" in its ability to accurately forecast future hydrological conditions.[17] Nonetheless, the Bureau provided specific percentages of modeled futures that achieved performance indicators for each of the six alternatives evaluated in Table ES-8 — Summary of Potential Effects of the Alternatives.

For example, assuming the Enhanced Coordination Alternative, 73% of the modeled futures meet the minimum performance standard of Lake Powell's elevation reaching 3,570 in at least 80% of years, which would reduce the risk of smallmouth bass entrainment.[18] This appears extremely optimistic. On October 1 in the previous five years, Lake Powell has been below 3,570 60% of the time — 2021, 2022, 2025.[19] The Bureau's February 2026 forecast projects it will not achieve 3,570 in October 2026 or 2027 under most probable and probable minimum inflow conditions.[20]

In addition, the DEIS evaluated the percent of modeled futures in which Lake Powell elevation is "always above minimum power pool (3,490 feet)." Under the Maximum Operation Flexibility Alternative, 95% of modeled futures meet that criterion.[21] Again, this appears extremely optimistic. The

Bureau's February 2026 forecast projects Lake Powell could fall below minimum power pool in July 2026 and remain at or below that level through December 2027, the end of the forecast period.

Given the uncertainties noted by the agency, and the long-term drought and low-runoff conditions expected in the future, is it reasonable to assign probabilities to any outcome modeled by the agency?

Thank you for considering these comments. I look forward to your responses in the final EIS.

FOOTNOTES:

1. U.S. Bureau of Reclamation, Draft Environmental Impact Statement, Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, January 2026, pages ES-3 and ES-5 (Post-2026 DEIS)

2. Post-2026 DEIS page ES-4

3. U.S. Bureau of Reclamation, Near-term Colorado River Operations, Final Supplemental Impact Statement, March 2024, page 1-2

4. https://www.usbr.gov/lc/region/g4000/riverops/24ms-projections.html

5. Ibid.

6. U. S. Bureau of Reclamation,, Technical Decision Memorandum, Establishment of Interim Operating Guidance for Glen Canyon Dam During Low Reservoir Levels at Lake Powell, March 26, 2024, page 9

7. Technical Decision Memorandum, page 2

8. Near-term Colorado River Operations, Final Supplemental Impact Statement, March 2024, page 2-3

9. Calculation derived as follows for theoretical maximum releases at minimum power pool elevation: 9,555 cfs x 31,557,600 seconds/year = 301,532,868,000 cubic feet/year; 301,532,868,000 ft3/43,560 ft3/acre-ft = 6,922,242 acre-feet

10. The least amount of water released from Lake Powell this century was 7 million acre-feet in 2022, according to data from U.S. Bureau of Reclamation, Colorado River Accounting and Water Use Report: Arizona, California and Nevada, 2000-2024

11. Technical Memorandum, page 5

12. Ibid., page 9

13. 8. Reclamation completes re-coating of outlet tubes at Glen Canyon Dam ahead of schedule, June 18, 2025; https://www.usbr.gov/newsroom/news-release/5184

14. Near-term Colorado River Operations, Final Supplemental Impact Statement, page 1-9, footnote 10

15. U.S. Bureau of Reclamation, Glen Canyon Dam Low-Head Hydropower Modifications, February 2023

16. January 20, 2026 email from Nick Williams, Power Manager,, Upper Colorado Basin Region, U.S. Bureau of Reclamation

17. Post-2026 DEIS, page ES-18

18. Ibid., page ES-39

19. Lake Powell Water Database; https://lakepowell.water-data.com/

20. https://www.usbr.gov/lc/region/g4000/riverops/24ms-projections.html

21. Post-2026 DEIS, page ES-49

Letter #: 5878

Date Received: 2/28/2026

Sender Names: 5838: russ.falconer@icloud.com

Emails: 5838: russ.falconer@icloud.com

Organizations:

Subject: Colorado River Agreement/Require Water Preservation Practices As A Factor In Colorado River Allocations

DOI - . If there is to be an equitable accounting of Colrado River water sharing there MUST be an honest discussion of California's long- term failure to build dams to capture river/rainwater. If California implemented dams as well , as say, Arizona(which is drier and has far fewer streams /rivers than California), then California's dependence on Colorado River water would be reduced. I therefore propose that one significant factor in allotting Colorado River water would be to measure the relative degree to which affected states capture and dam available rain/river water. Such a measure would reward responsible water mangement practices ,ensuring that mere population size not be an excuse for prolonging inefficiencies and, frankly, irresponsible behavior prompted more by politics than rational water allocation. I recognize such a policy would have to be feathered in but until the people who decide these issues face up to Califonia's need to improve its practices and reduce its need for Colorado water nothing will change , the other states that practice good water stewardship will suffer and the Colorado River will continue to suffer.

Letter #: 3944

Date Received: 2/26/2026

Sender Names: 3901: Lori Russell

Emails: 3901: snowplow81655@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, I reside in the upper Colorado River Basin for the last 50 years. I have been a lifelong recreational user of all of the western slope rivers, as well as a regular traveler of the western states. It has always surprised me to see the extremely wasteful uses of western water to develop and cultivate the western states. This is a model that was built when we thought there was an infinite amount of resource. Now that we all see climate change at our door and realize the demand for water is too high for the availability, it is time to develop a new business model for future developement. The most important considertion of developing this model is agreeing on the world we would like to see and live in, while recognizing the limitations of our natural resources. Our old fashioned irrigating systems used for agriculture are grossly inefficient. And I believe our agricultural priorities must be re-assessed, since this uses 85% of all the water. This western desert was never intended to grow lettuce through the winters, or grow so many water-hungry Ag products that are shipped overseas. When I travel around the west through agricultural areas, I see ranchers shooting fire hoses into the air, over their fields in mid-day when 30% is lost to evaportion. All over open canals and reservoirs also loose at least 30% to evaporation. Requiring a higher water-use fee for industry, golf courses, luxury horse ranches and agriculture will impose an incentive to stop growing high water use products in the desert, making it economically unviable. When determining the preferred Alternative for Post-2026 Operations, I request that the Bureau of Reclamation prioritize the below elements and work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river for generations to come. - Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. - Conservation measures and delivery of water between the Upper and Lower Basins must balance maintaining minimum flows at all times in the Grand Canyon with allowing for both the river ecosystem and river recreation opportunities. - Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities. - Impacts to river recreation opportunities on the Western Rivers must be analyzed and mitigated. - Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. Thank you for this opportunity to provide input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - Draft Environmental Impact Statement (Post-2026 Operations). I urge you to take immediate action to protect the future of the Colorado River Basin and to recognize the many ecosystem services that the river and its tributaries provide. We live here. Lori Russell, Steamboat Colo. . Sincerely, Mrs. Lori Russell PO Box 771886 Steamboat Spr, CO 80477-1886 snowplow81655@yahoo.com

Letter #: 4487

Date Received: 2/28/2026

Sender Names: 4454: LISA RUTHERFORD

Emails: 4454: lisar@bajabb.com

Organizations:

Subject: Rutherford public comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

DOI - . Bureau of Reclamation,My comments pertain to the Draft EIS for operation of Lake Powell and Lake Mead post 2026. I live in southern Utah, Ivins, Utah, specifically, and have been involved in Colorado River issues since 2006 when the Lake Powell Pipeline Development Act was passed. The Act attempted to bring around 86,000 acre-feet of water from Lake Powell to our county, Washington County, 140 miles away. Since 2006 we've seen a fairly steady decline in the level of Lake Powell with only intermittent increases. Fortunately, Mother Nature took action before our state was allowed to commit billions of dollars of our tax dollars to this project that would not be viable. Never the less, Utah leaders continue to battle to get water they "think" they are due.The demands on the river and the effects of climate change which we have seen worsen over the past twenty years have created a situation that requires all of us to give and not just demand more. While California has already worked hard to reduce their water use and demand, Utah has done little in that regard, and the draft plan alternatives seem to lay the burden on California. In fact, in Washington County where I live the usage has gone up in the last year at temperatures soar and people use more water to protect their lawns and other vegetation. And, more courses are being planned in spite of less water available. The fact that Utah has not used all the water that they feel is due them does not justify giving them the option to be excluded from making conservation a main component of their water management.Utah's legislators are already stashing away our tax dollars to provide a slush fund for the looming legal battles having to do with lawsuits resulting from Colorado River battles.Those of us who have been paying attention, know that the states have been deadlocked for two years over how to share water shortages, among other issues. The states failed to put forward a joint alternative in 2024 and missed a November 2025 deadline to reach consensus. At the end of January 2026, governors were unsuccessful in their attempts to settle the issue. Utah has been leading this effort to put up roadblocks so they can get what they want: more water!The last deadline for an agreement was February 14, and again the states failed, which pushes the states closer to litigation, leaving decisions about the future of water in the West to U.S. Supreme Court judges.Five alternatives for managing the Colorado River are offered in the DEIS. Fortunately, that is not a "fixed" menu and there is opportunity to make adjustments.It's my understanding that under the No Action Alternative, the river would revert to outdated and speculative operating guidance that was in place before the 2007 Interim Guidelines. So, this is not a tenable option.It's also my understanding that the Basic Coordination Alternative does not do enough to maintain the hydropower energy needed across the Basin, with hydropower production in Lake Powell preserved in just 33% of scenarios and hydropower production in Lake Mead preserved in 61% of scenarios.The Enhanced Coordination Alternative performs better by many measures than the Basic Coordination Alternative. Deadpool-related reductions are avoided in 84% of modeled scenarios. Hydropower production in Lake Powell is preserved in 86% of scenarios and hydropower production in Lake Mead is preserved in 81% of scenarios.The Maximum Operational Flexibility Alternative provides greater system stability, avoiding unplanned dead pool-related reductions in 91% of modeled scenarios. In addition, the alternative maintains power pool elevations in 95% of scenarios in Lake Powell and 87% of scenarios in Lake Mead. This seems the most reasonable alternative and has been suggested by conservation organizations.The new guidelines must promote water conservation across the Basin, and management decisions need to be based on how much water is actually in the river and stored across its major reservoirs. Reclamation must make provision for planned shortages so that they are not caught flat-footed when those shortages present themselves. Planning rosy scenarios rather than realistic ones does none of the states favors. Expanded conservation pools are needed to allow water to be saved and moved between Lake Powell and Lake Mead to protect river health and stabilize the system. We cannot, and should not, turn our backs on the health of the river system that supports the health and well-being of over 40 million U.S. citizens.Reclamation asserts they have had extensive engagement with stake holders, but despite this

extensive engagement, a consensus-based approach to Basin reservoir operations has not yet been achieved and therefore, Reclamation has not identified a Preferred Alternative in this Draft EIS. One can only hope that this effort by Reclamation will produce a plan that satisfies the real needs of those who live and work in the West and rely on this river.It's unfortunate that determination of deliveries to Mexico is not a part of the proposed federal action. To cut out the issue of water delivery to Mexico, which is an important element, just leaves one more problem to resolve. Lisa Rutherford173 Painted Hills DriveIvins, Utah 84738

Letter #: 6697

Date Received: 3/1/2026

Sender Names: 6667: Ted Ryan

Emails: 6667: bringwater3@gmail.com

Organizations:

Subject: Arizona allocation if basin Colorado water shed.

DOI - . Please consider percentage of colorado river shared as equal per populations. Arizona is special due to many factors that provide importance to crops, high tech and developed life styles. The western water shed is unbalanced consider.the mega dams in California...vs Arizona.Ted RyanCamp Verde5302280455

Letter #: 6794

Date Received: 3/1/2026

Sender Names: 6763: Gayna Salinas

Emails: 6763: info@greatbasinwater.org

Organizations:

Subject: Gayna Salinas Comments on Colorado River

Great Basin Water Network DOI - . Even though there are
hundreds of pages written in the Post-2026 Colorado River Reservoir Operations DEIS, the document is not going to make it snow or rain. We are in a severe drought cycle, and the water needs to be managed outside of the box, ie it cannot be managed the way it has been. The water availability impacts on communities in the Lower Colorado River Basin are too narrowly reviewed in the Technical Appendices. There is no mention of everyone having to tighten their belts, concerning water availability and water usage. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.If you have any additional questions please contact me.Gayna Salinas(c) Great Basin Water Network.
Powered by weForms.

Letter #: 3197

Date Received: 2/26/2026

Sender Names: 3167: Cathy Schaefer

Emails: 3167: cathy.schaefer@yahoo.com

Organizations:

Subject: The Colorado River

DOI - . The Solutions We NeedWe urge the Bureau of Reclamation to strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocationsThese priorities are needed. Thank you. Cathy Schaefer(727) 515-7334zip code 34684

Letter #: 689

Date Received: 2/26/2026

Sender Names: 679: Justin Scheible

Emails: 679: justinscheible@everyactioncustom.com

Organizations:

Subject: The Water problem in the Western US starts with transbasin diversions taking water east. Denver/Northern water must be restricted for more water to head downstream.

DOI - . Dear Carly Jerla Bureau of Reclamation, As the owner of a whitewater rafting company, a snow sports professional, and an avid river enthusiast, I have been on the front-lines of the water issues in the American West for most of my life. I have watched this river suffer enough from decades of overuse. I live on Vasquez Creek, a primary contributor to the Fraser River, which is one of the primary tributaries of the upper Colorado River Basin. The problem with the Colorado River is not a problem for just downstream users, it starts right here at the very headwaters. The primary issue for the river begins with Denver Water and Northern Water taking more than they need by extorting more and more water rights to feed the growing population of Colorados front range cities, expanding reservoir storage on the east side of the divide, and continually pulling more water from the Upper Colorado year after year. They do this with impunity, somehow protected by ancient water law, emboldened by capitalism, and not incentivized in any way to conserve water because they're making money hand-over-fist. This river is dying. It has nothing left to give. These trans-basin water diversions take water from the Colorado River and divert it through the Continental Divide, now bound for the Mississippi basin and never to come back. This inevitably leads far less water heading west, which over decades has contributed to the aridification of the Western US, and Denver/Northern water do not care about the downstream needs west of the divide. Far less water heading west mean less water vapor evaporates into the atmosphere, leading to lesser snowpack and shorter winters. This is a predatory cycle for the health of the river and it must stop now. As I write this, more and more reservoir storage is being built on Colorados front range cities. The Gross Mountain Expansion will take what little water is left already, and more are being built. There are no water restrictions, and Kentucky bluegrass growing on every lawn, meanwhile Denver golf courses use 2-3 million gallons a day. -This water siphon must be stopped at its source or less and less water will head towards Powell/Mead every year. -this is the least talked about usage of CO river water, but it is definitely the most damaging. The Fraser and Upper Colorado river are being sucked dry to the point of no return. This leaves the downstream users fighting for scraps. -this trans-basin usage must be slowed to a necessary allotment, not a capitalistic money grab -our need for fresh water and misuse of this resource will quickly lead to the demise of the American west. -there is no incentive for water users east of the divide to take less water, and the water law must be amended to restrict the amount of water the is sucked east. -more conservation high in the basin leads to more flow downstream. This leads to more moisture in our storm systems, and more snowpack leads to more water heading west. -These transbasin diversions are destroying an entire ecosystem and aridifying the west, but all anybody talks about is how the the downstream users have to split up the leftover scraps. -our need for fresh water and the misuse of it will be the undoing of this ecosystem and this country if problems are not addressed immediately. This river has nothing left to give and and this country cannot sustain this same program any longer. Institute change on a massive scale or we will find out the hard way exactly how important our fresh water supply really is. Sincerely, Justin Scheible Sincerely, Mr Justin Scheible 807 Vasquez Rd Winter Park, CO 80482-5653 justinscheible@gmail.com

Letter #: 2557

Date Received: 2/26/2026

Sender Names: 2535: Jonathan Schlefer

Emails: 2535: schlefer@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

DOI - . Dear Carly Jerla Bureau of Reclamation, I'm writing to provide input on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. I recognize that the Colorado River and its tributaries supply water to tens of millions of people and is a vital economic resource for much of the American West, but I'm writing to ask that you work with the seven states and tribes that draw on the river to establish effective water conservation measures that will sustain the river basin for generations to come. Hiking in the Grand Canyon and paddling down Cataract Canyon have been among the most powerful experiences of my life -- experiences that I'm sure many who work in the Bureau of Reclamation have shared. I'm no expert in hydrology, but I'm writing to urge you to carry out negotiations and ensure that the river basin survives in healthy condition and provides such experiences to Americans for generations to come. Sincerely, Mr. Jonathan Schlefer 80 Sheridan St Jamaica Plain, MA 02130-1851 schlefer@alum.mit.edu

Letter #: 294

Date Received: 2/17/2026

Sender Names: 292: Brian Schottin

Emails: 292: schottinb@gmail.com

Organizations:

Subject: Colorodo River crises

DOI - .Ban the use of river and ground waterTo grow alfalfa ,hay ,rice ,almonds dairy farms ect and any other water wasteful crop in lower and upper basin active immediatelyOutlaw foreign countries or investors from using our surface and groundwater for agriculture active immediatelyBan the use of irrigation water for lawns landscaping car washing in every town , city in all upper and lower states active immediatelyPut a huge tax on swimming poolsIn all towns cities active immediatelyStop locating any industries that require vast amounts of water in the southwest active immediatelyBan golf courses and any tourist activityThat consumes vast amounts of waterIn other words spread the pain to every corner of society so they finally get the message and start wising upThere isn't any water!!The idiot lawyers arnt going to make it rain either by the wayAfter you spread the pain to everyoneCreate " water sister cities"Example:1 connect Chicago to phoenix with a water line2 allow Chicago to sell phoenix cleaned water that comes from their sewage plants only. Not directly from the lake3 Chicago sells to phoenix only so it can be scrutinized and regulated strictly4 then connect Green Bay to DenverDetroit to lasvegas so on so on 5 use the money made to invest in reforesting the water sheds draining into the lakes Rebuilding aquifersOnly let them sell cleaned water from their sewer plants between two citiesWater that has been used once already and is locked up in the system onlyNot water directly from the lakes or riversWhen all that is working remove all those god forsaken dams that all those clueless people built in those riversRaise the price of water and temporarily crash the agricultural industries in the southwest so people all over the country get the point that they need to respect Mother Nature or she will stomp them out of existenceSent from my iPhone

Letter #: 3352

Date Received: 2/26/2026

Sender Names: 3321: Kris Schroeder

Emails: 3321: kris.schroeder@gmail.com

Organizations:

Subject:

DOI - . It's the right thing to do

Letter #: 3847

Date Received: 2/26/2026

Sender Names: 3321: Kris Schroeder

Emails: 3321: kris.schroeder@gmail.com

Organizations:

Subject:

DOI - . It's the right thing to do

Letter #: 3161

Date Received: 2/26/2026

Sender Names: 3132: Trina Schroer

Emails: 3132: schroer@jhu.edu

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits.Specifically, the new Colorado River guidelines must:- Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems.- Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology does not support filling both Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue needlessly drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin.- Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin.- Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights.---I would like to add a personal comment. I have taken two trips on the Colorado River, one in 2019 (Grand Canyon: Lee's Ferry to Lake Mead) and one in 2022 (Cataract Canyon, Potash to Hite). In the GC I experienced constant cold water temperatures and flux (due to overnight releases from Lake Powell), and also witnessed invasive species taking over many of the banks. It was obvious that a free-running river would be more ecologically healthy. After that trip I became interested in the lost Glen Canyon -- a place of incredible beauty that I will never see. I went on a trip through Cataract Canyon with the Glen Canyon Institute to check out Canyonlands and the "returning rapids" section -- sections of the river that used to be covered by Lake Powell.Most of the river was gorgeous red rock, but the lower stretches are covered with high banks of sediment. It is slippery and crumbly and dangerous underfoot. With time, this accumulation will presumably wash away, and more downstream sections are being uncovered every year. The return of native species is wonderful to see. I hope, at some point before I die (I am 66), to be able to take a trip further down the canyon to see some of the remarkable natural sandstone features that have been long submerged.Please get rid of, or bypass the Glen Canyon Dam. Fill Mead first. Let people once again have access to the glory that is Glen Canyon. Thank you for your consideration.----------Trina A. Schroer, Ph.D.(she/her/hers)Professor of Biology203 Biology EastThe Johns Hopkins University3400 N. Charles St.Baltimore, MD 21218voice: 410-516-5373fax: 410-516-5213Johns Hopkins sits on the ancestral land of the Paskestikweya (Pist-ka-tanh-wah) people in Baltimore City.I humbly offer my respect to the elders, past and present citizens, of the Cedarville Band of the Piscataway Conoy, the Piscataway Indian Nation, and the Piscataway Conoy Tribe, all Algonquian (Al- Gon-Qwe-An) Peoples.

Letter #: 7346

Date Received: 3/2/2026

Sender Names: 7306: John G. Schwarzenbach

Emails: 7306: gerbear1@icloud.com

Organizations:

Subject: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

DOI - . Sirs: Operations at Glen Canyon Dam have forever impacted the health of the Grand Canyon ecosystem. As assumptions which dictated the dam's design are revisited and adjusted towards reality, considerations of ongoing effects to the the lower Colorado River and the Grand Canyon, specifically must be addressed: Commit to manage the Colorado River and its resources sustainably. Follow the Grand Canyon Protection Act of 1992. Commence a comprehensive study of Glen Canyon Dam infrastructure. Maintain Lake Powell water levels above 3,525 feet. Keep Lake Powell at higher elevations around 3,570 feet. Ensure that Glen Canyon Dam releases allow variable high and low flows in the canyon. Please insure that your efforts to remedy these operational shortcomings are addressed in the post-2026 Colorado River Operations plan. Thank you, John G. Schwarzenbach

Letter #: 3336

Date Received: 2/27/2026

Sender Names: 3305: Bonnie Schweinler

Emails: 3305: bonschwein@aol.com

Organizations:

Subject: The Colorado River

DOI - . Where do you think we're heading in the current status of climate change?I say no place good. Millions of people depend on the Colorado River for waterin our country's driest area; now we have the added threat of data centerscompeting for it.Do you actually support the continuation of climate change? If you do,I sincerely hope you don't have children.

Letter #: 12

Date Received: 1/21/2026

Sender Names: 11: Sharon Seely

Emails: 11: sjseelytwo@gmail.com

Organizations:

Subject: We support a Final EIS

DOI - . We support a Final EIS that enforces the long-standing Law of the Colorado River and protects Nevada's established rights. The Final EIS should reflect the Upper Basin's delivery obligation at Lees Ferry and should fully protect Nevada's 300,000 acre-feet annual allocation and lawful storage in Lake Mead. Reclamation should not use temporary or experimental measures to shift disproportionate risk onto Nevada or create new baselines that erode existing protections."Sharon and Larry Seely6475 Darby AveLas Vegas NV 89146sjseelytwo@gmail.com

Letter #: 2214

Date Received: 2/20/2026

Sender Names: 2197: Bruce Seligmann

Emails: 2197: bruceseligmann@biospyder.com

Organizations:

Subject: Colorado River water use proposal

DOI - . The ~6 million tax payers will use CAP water should not be cut any more than agricultural or mining users. The day of growing water hungry crops, or carrying water intensive industrial or mining operations needs to be put into the past. Laws from the 1800's and Agreements made in the early 1900's no longer work and should not apply. Bruce Seligmann 6290 N Nirvana Place, Tucson, AZ 85750

Letter #: 8

Date Received: 1/24/2026

Sender Names: 8: Niki Selz

Emails: 8: nikihselz@gmail.com

Organizations:

Subject: Draft EIS comments

DOI - . My name is Niki Selz and I live in Denver, Colorado. Please listen to tribal requests concerning the Colorado River draft guidelines:Permanent Tribal Participation: Establishing a permanent, meaningful, and direct role in all future negotiations and decision-making, rather than being excluded or invited only sporadically.Protection of Rights & Assets: Ensuring that proposed conservation, marketing, or leasing rules for the Colorado River do not infringe upon tribal sovereignty, water rights, or their ability to develop water resources.Recognition of Past Contributions:Acknowledging that tribal nations have often been forced to bear disproportionate water cuts and that their senior rights must be respected in any new, equitable allocation.Respect for Cultural/Environmental Values: Incorporating indigenous perspectives on the river's health, focusing on sustainability, and protecting the ecosystem rather than just prioritizing large-scale consumption.Access to Clean Water: Prioritizing the infrastructure necessary to deliver clean, running water to tribal communities.

Letter #: 290

Date Received: 2/17/2026

Sender Names: 288: Tim Shanklin

Emails: 288: tim.shanklin@siemens-healthineers.com

Organizations:

Subject: Our Water

DOI - . A lot of these farmers are growing crops that require a lot of water, and they export their crops for maximum profit. Our water needs to be protected from this practice. They are essentially exporting our water. We can't allow this. Tim ShanklinField Product Specialist Varian, a Siemens Healthineers company6883 Spencer St., Las Vegas, NV 89119 United Statestim.shanklin@varian.com+702.241.7930varian.com

Letter #: 2757

Date Received: 2/22/2026

Sender Names: 2733: Paul Siegler

Emails: 2733: psiegler1@gmail.com

Organizations:

Subject: Colorado River EIS

DOI - . It's time to begin planning the construction of diversion tunnels around Glen Canyon Dam. This should have begun years ago, when it became known that the basin is in a millennial drought. This project would take at least ten years.The river could drop below MPP this year. At that point the whole Colorado River system would be at risk.

Letter #: 17979

Date Received: 12/4/2024

Sender Names: 11003: Andrew Sikorski

Emails: 11003: artworks1437@yahoo.com

Organizations:

Subject: Page 004

As a resident of the southwest and specifically of Arizona which has one of the lowest priority water rights of the Colorado river states, this is a very real and concerning issue. Action cannot wait! The drought has continued and will continue. Millions of lives will be affected. Most people and business (including water intensive users like AI data centers and foreign farming interests) have continued like it is business as usual and this is not sustainable. As usual, the average citizen is going to be who pays the biggest price and feels the worst impact from the inaction of local, state, and federal governments in properly and sensibly regulating the limited water that millions depend on. The ongoing mega-drought demands bold, science-based action to protect the Colorado River system for future generations. We need a strong approach that provides an actionable framework for safeguarding critical infrastructure, protecting endangered species and the Grand Canyon, maintaining ecosystem function, and ensuring climate resilience. None of these proposed alternatives fully address the impacts that will result from a dead pool situation. This is a serious omission that Reclamation needs to address in the Final EIS. We also urge the Bureau to use its considerable influence with the States to expand greater conservation efforts. There is less water now to use than there was, and there will be even less in the future. We need to adapt a new way of thinking, using a lot less water and rethinking how "beneficial use" is defined. I urge you to adopt a science- based, climate-resilient approach that: -Requires significantly stronger conservation across all sectors -Ensures equitable and implementable shortage sharing -Protects the Grand Canyon and endangered species -Maintains ecosystem function throughout the basin -Fully respects Tribal sovereignty and senior water rights -Reexamines outdated assumptions about "beneficial use" in a hotter, drier future The Colorado River is in crisis, and the decisions you make now will determine whether this river system can survive for future generations.

February 22, 2026

Dear Bureau of Reclamation,

Thank you for taking your time putting together the DEIS for Post-2026 Management of the Colorado River's major reservoirs. Both the 2,000 page length and the Decision Making under Deep Uncertainty approach speak to the breadth of challenges ahead as drought conditions persist throughout the Colorado River watershed. I write this comment with respect and acknowledgement of these realities.

These are perilously dry times, as anyone living in the West can attest. As a lifelong resident of both the lower and now upper basin, my concerns about the future management of our shared river ranges throughout its 1,700 mile length and 250,000 square mile watershed. Beyond the 40 million people dependent on the river, this includes endemic and endangered species, riparian plant corridors, and a significant portion of our Nation's food supply. I write with concern for the river itself and the groundwater flowing as an invisible undercurrent of the watershed. The steps ahead will be necessarily complicated and strenuous for all.

My comments apply to all plans proposed in the DSEIS.

-With water levels in Lake Powell reservoir projected to plummet to dangerously low levels as early as this summer[1], why do none of these plans address Glen Canyon Dam's antiquated and compromised infrastructure due to damage in the lower outlet works? This comment is based on the BOR memo dated March 26, 2024.[2] While I am aware bare minimum mitigation is taking place, if the reservoir drops below 3,490 feet there is currently no safely operable method to release Colorado River Compact mandated releases into the lower Basin. It's a daunting reality that we may face this water year, but there is no more time to waste in developing a plan to resolve this weak link when models indicate it will be an ongoing issue.[3]

-In all proposed plans, the only mandated cuts to water use are implemented on the lower Colorado River Basin. While the upper basin is not using its full apportionment of water, all areas of the river, upper and lower basin, must be managed for the river we know we have today, not the hyped up river the Compact signers hoped we had 100 years ago. This is not about picking sides or unrealized economic development, it is a simple math equation in working with the water actually available, and it does not add up unless both basins make cuts.

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[1] https://www.usbr.gov/lc/region/g4000/24mo.pdf

[2] https://www.8newsnow.com/wp-content/uploads/sites/59/2024/04/20240326-EstablishmentInterimOperatingGuidanceGlenCanyonDamLowReservoirLevels-TechnicalDecisionMemo-508-TSC.pdf

[3] Draft EIS: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead, Executive Summary, ES-21

-In both cases, failure to address infrastructure issues and basin-wide cutes, will first in line, starves the Grand Canyon of water, gravely impacting a landscape sacred to 11 Tribes[4] and a national treasure visited by 5 million global tourists annually.[5] It will inflict dire water shortages on 25 million people downstream as soon as this summer, stymy agriculture and weaken national food security. It will also result in failures to deliver water to Tribes and Mexico mandated by the Colorado River Compact.

-The draft post-2026 plans do not address groundwater pumping in any meaningful way and fail to consider how this affects annual flows and water availability, both in tributaries and the mainstem of the Colorado River. I hike upwards of a thousand miles each year visiting springs and tributaries throughout the Colorado River watershed. In many cases, the water seepage is noticeably diminished year after year or when compared to past documentation. These are visible signs that our groundwater is not infinite, and that we are neglecting to consider the hidden effects of our groundwater pumping on the future viability of the Colorado River.

The conditions in which these proposed plans were drafted are unprecedented in our lifetimes. It is prudent that any plan to carry the Colorado River Basin through the next 1, 5, or 20 years address the two most overt obstacles to successful basin-wide water conservation and delivery—infrastructure and shared basin-wide water cuts, or we risk the whole house.

The U.S. government can print more money, but it cannot create new water. Nor can water from other regions bail us out, as the United Nation University reports that the planet has entered a water bankruptcy era where 75% of the world is living in countries grappling with water scarcity.[6] The Colorado River is among the UN's noted global hot spots for overpromised water, water shortages, and conflict.[7]

We must live within our water reality in the Colorado River basin. To neglect to do so, robs the future citizens (human, fish, willow, cottonwood, deer, coyote, children, and the Pacific flyway) of the Colorado River watershed of their life source.

Thank you for your consideration,

Morgan Sjogren

Concerned Citizen of the Colorado River Watershed

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[4] https://www.nps.gov/grca/learn/historyculture/associated-tribes.htm
[5] https://www.nps.gov/grca/learn/news/visitor-spending-2023-report.htm
[6] https://news.un.org/en/story/2026/01/1166800
[7] https://unu.edu/inweh/news/world-enters-era-of-global-water-bankruptcy

Letter #: 3693

Date Received: 2/27/2026

Sender Names: 3656: Benjamin Smith

Emails: 3656: benjamin.r.smith2025@gmail.com

Organizations:

Subject: Colorado River management comments

DOI - . Hello, I have a few priorities that matter very much to myself and other recreational users of the Colorado River. First is to analyze a river level bypass for the Glen Canyon and to shift water storage into a "fill mead first" strategy. Second is to acknowledge how much value exists in Glen Canyon and to take actions with this valuable resource in mind. The reemergence of Glen Canyon would provide ample recreational opportunities and only improve rafting opportunities in lower Cataract canyon. There are so few places in the world where river trips can occur nearly year round and Cataract and Glen canyon river trips would greatly improve with by bypassing the Glen Canyon dam. Please, seriously consider these actions and understand that there is so much potential for recreation and exploration that is currently buried under Lake Powell. While I speak for myself, know that there's a large community of river runners who would greatly benefit from this change. Look at how many people apply for San Juan, Grand Canyon, and other sections of the Colorado River and its tributaries. These people would love to explore and boat on sections of the Colorado currently impacted by reservoir Powell. Benjamin Smith 865-307-1922

Letter #: 8850

Date Received: 3/3/2026

Sender Names: 8759: Bryant Smith

Emails: 8759: bryant1959@sbcglobal.net

Organizations:

Subject: Colorado River Basin post-2026 Operational EIS

DOI - . I find the draft EIS's discussion of Glen Powell Dam infrastructure protection to be completely inadequate. What needs to be protected, why is it important, what happens if the infrastructure fails, and how might infrastructure protection be achieved -- these need to be discussed in clear, easily understood terms. If infrastructure modifications need to be made to protect the dam in low water situations, then it would be prudent to discuss them here, given the Southwest's ongoing drought. The dam was designed based on water flow models that have been found to be overly optimistic and inaccurate. The Colorado is a highly variable river, and the infrastructure may need to be updated to deal with that reality. As this winter's snow drought drags on, it appears quite possible that Lake Powell will decline to dead pool, even with the best of intentions and interstate/ interagency coordination. Then what happens? That should be disclosed in the EIS. The EIS should consider the development of a river level bypass at Glen Canyon Dam -- as an added infrastructure protection measure, as well as for maintaining basic riverine ecosystem function. We should not limit all of the alternatives/ options to those which require maintaining a Lake Powell elevation above the current dead pool level. What if continued drought and high seasonal temperatures renders that an impossibility, even with releases from the upstream dams? That seems a distinct possibility -- dead pool. Address it. Bryant D. Smith 2092 W Redwood Way Prescott, AZ 86303 bryant1959@sbcglobal.net

Letter #: 7190

Date Received: 3/1/2026

Sender Names: 7154: Carly Smith

Emails: 7154: c1016smith@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, My first river trip was on the San Juan River while I was a student at Fort Lewis College. Our classrooms often extended into canyon country. We floated through desert silence and hiked in and around Bears Ears, learning the geology, biology, and cultural history of the San Juan watershed. On that first trip I learned to rig boats, read water, and travel safely and self sufficiently in remote places. More importantly, I learned respect for a river system that sustains both people and ecosystems. Those lessons followed me to the Gunnison River, where friends and I carried kayaks into Gunnison Gorge and either paddled it in a day or spent nights under the stars. The canyon walls, the cold water, and the rhythm of the current created a lasting connection to that landscape. As our skills grew, we introduced new friends to multi day trips on the calm stretches of the Green River through Labyrinth Canyon. On those quiet floats I began to understand western water rights and the deep interconnection of the Colorado River Basin. In November 2024, I was fortunate to launch on the Colorado River through the Grand Canyon with fifteen of my closest friends. For weeks we moved through 1.8 billion years of exposed geology, navigating rapids carved by time and sediment. This experience is not unique to our group. Every person who travels through the Grand Canyon leaves with a profound understanding that this river is the lifeblood of the West. Thank you for the opportunity to provide input on the Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft Environmental Impact Statement. I urge you to take immediate action to protect the future of the Colorado River Basin and to recognize the many ecosystem services the river and its tributaries provide. When determining the preferred alternative for Post 2026 Operations, I respectfully request that the Bureau of Reclamation prioritize the following and work directly with the seven basin states and Tribes to ensure conservation measures support a living river for generations to come: Storage in Lake Powell and management of Glen Canyon Dam must continue to support High Flow Experiments in the Grand Canyon for sediment and nutrient transport. Infrastructure updates at Glen Canyon Dam must be prioritized to ensure the dam can pass variable flows downstream as reservoir levels decline and become less predictable. Conservation measures and delivery between the Upper and Lower Basins must maintain minimum flows in the Grand Canyon while allowing seasonal variability that supports river ecosystems and recreation. Water delivery measures involving Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream ecosystem and recreation impacts and seek multiple benefits where possible. Impacts to recreation on the Colorado River and the San Juan River due to changing reservoir levels must be analyzed and mitigated. Operations must evaluate how daily flows in the Grand Canyon and upstream segments will be affected before final decisions are made. Agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the basin. A trip through the Grand Canyon leaves a lasting impression because the river that carved it sustains cities, agriculture, Tribal communities, fisheries, riparian habitat, and recreation economies. There is a real economy built around river running, and those who fall in love with these places become stewards who advocate for their protection. I studied geology and wetlands resources and worked for the U.S. Army Corps of Engineers in Durango, Colorado. I understand the significance of the water management agreements expiring at the end of 2026. Agricultural users, recreational users, municipalities, Tribes, and homeowners across all seven basin states will feel strain, but we cannot sacrifice these irreplaceable canyons and the ecosystem services they provide. We must work with what nature provides and do so together. Sincerely, Ms Carly Smith 407 22nd St Hood River, OR 97031-1267 c1016smith@gmail.com

Letter #: 360

Date Received: 2/16/2026

Sender Names: 358: Courtney Smith

Emails: 358: dcourtneysmith5@gmail.com

Organizations:

Subject: Strategic Water Management, State Responsibility, and Protection of Lake Powell

DOI - . Dear Bureau of Reclamation Leadership,I am writing to express concern regarding long-term water management policies affecting Lake Powell and the broader Colorado River Basin.Lake Powell is not merely a reservoir; it is a critical piece of national infrastructure. The reservoir supports water delivery to millions of Americans across the Southwest and generates essential hydropower through Glen Canyon Dam. Maintaining reservoir levels at or near operational capacity--ideally above 90% full whenever hydrologically possible--is vital for electrical generation stability, grid reliability, agricultural support, municipal supply, and economic security throughout the basin states.In recent years, the public has repeatedly been told that the Southwest is in constant drought crisis. While long-term aridification trends are real and must be addressed responsibly, it is also clear that significant inefficiencies exist at the state level in capturing, storing, and allocating water during high-precipitation years.Each state within the Colorado River Compact should be required and incentivized to:Capture and store as much precipitation and snowmelt as possible.Direct runoff into state reservoir systems rather than allowing preventable discharge.Improve intra-state conveyance systems so stored water is redirected to regions within their own state experiencing shortages.Modernize infrastructure to minimize waste, evaporation loss, and emergency releases.California is a widely cited example of system inefficiency. The state has experienced multiple exceptionally wet winters in recent years, particularly from December through May. Yet, despite record snowpack and rainfall totals, drought declarations often resume by early summer. Large volumes of freshwater have been observed flowing through aqueduct systems and ultimately discharged to the Pacific Ocean during high-flow periods due to regulatory constraints, environmental advocacy groups, limited storage capacity, or infrastructure limitations. While environmental protections and flood control are important, the long-term sustainability of Western water supplies demands better balance between environmental flow requirements and strategic water retention. California has so many lakes that are at capacity (Lake Tahoe) and hold 10x the amount of water that Lake Powell can hold and yet California will not utilize water from there due to environmental 'concerns'.Similarly, across the basin:Limited reservoir expansion and groundwater recharge infrastructure in parts of California and Arizona reduce the ability to bank surplus water during wet years.Agricultural irrigation inefficiencies in several basin states continue to consume significant allocations without modernization requirements.Urban growth in Nevada and Arizona continues to increase demand without proportional investment in long-term water capture or reuse infrastructure.Regulatory barriers in some states restrict rainwater harvesting at the individual or municipal level, limiting decentralized collection potential.Lake Powell serves as the Upper Basin's primary storage and compact compliance tool. When its elevation drops too low, hydropower production declines, grid stability is threatened, and the risk of compact curtailment increases. Hydropower from Glen Canyon Dam provides low-cost renewable energy to communities across the region. Reduced generation forces utilities to rely on more expensive and often less environmentally friendly alternatives.For the long-term security of the Colorado River system, I respectfully urge the Bureau of Reclamation to:Prioritize policies that keep Lake Powell at healthy operational levels.Incentivize states to maximize capture during high-precipitation years or penalize them for not doing that.Encourage expansion of off-stream storage and groundwater recharge projects.Promote agricultural efficiency improvements tied to allocation agreements.Increase transparency in reporting preventable water releases during wet cycles.Coordinate basin-wide strategies that reward proactive storage rather than reactive drought declarations.The West cannot afford to treat wet years as temporary anomalies and dry years as inevitable crises. Strategic capture and responsible management during abundance is the only sustainable way to protect Lake Powell, preserve hydropower generation, and ensure long-term water security for millions of Americans.Thank you for your attention to this matter and for your continued stewardship of one of the most critical water systems in the United States.Respectfully,Courtney SmithSalt Lake City, Utah(909) 227-1177 - cellGetOutlook for iOS

post2026@us

OF ARIZONA'S WATER

DAY TO SHARE THOUGHTS ON COLORADO RIVER PLANS

Letter #: 7524

Date Received: 3/2/2026

Sender Names: 7476: Heather Snow

Emails: 7476: heatherlynnsnow@gmail.com

Organizations:

Subject: Colorado River

DOI - . To Whom It May Concern, I have been a guide on the Colorado River in the Grand Canyon for over 30 years, witnessing both record-high and record-low water levels. Based on my experience, it is essential for the safety of our guests and the continuation of recreation in the canyon that the river flow is maintained at a minimum of 8,000 cfs. Furthermore, keeping the river clean and unpolluted is a top priority. I strongly oppose the opening of uranium mines in the area and believe water management should prioritize environmental preservation over industrial interests. We should prioritize reducing water waste, such as maintaining golf courses and private lawns, before compromising the health of the river ecosystem. Thank you for your time and for considering these critical issues. Sincerely, Heather Snow

Letter #: 7641

Date Received: 3/2/2026

Sender Names: 7591: John Solin

Emails: 7591: john@jsolin.com

Organizations:

Subject: CRB COMM

DOI - . as a homeowner in the Phoenix area, it is very troubling that seven states cannot get together and come up with a fair plan of water allocation. Just because Arizona is the last state in the flow of water does not mean that we should have to suffer by the excessive uses of all the upstream states, especially Colorado and Utah. There needs to be some method of allocation that takes into account both the population as well as the amount of water that each state needs to support just the residence, let alone the industry such as agriculture. ARIZONA has always been very watchful of the need to conserve and manage the water available, however, I don't believe that those states that are not in the same climate have made any significant changes of the water use in the last 20 or 30 years. Please do not make ARIZONA the scapegoat and give us our fair share of this water resource, which is essential to maintain and grow our economy. Thank you very much.
John Solin 360-969-1227 Cell

Letter #: 5449

Date Received: 2/28/2026

Sender Names: 5413: john sonin

Emails: 5413: sojohn61@hotmail.com

Organizations:

Subject: terraforming

DOI - . We must STOP terraforming this Planet! The only entity that considers all the indirect system consequences is the Divine Creator, science ONLY deducts the direct reactions!John SoninDouglas, AK

Letter #: 6879

Date Received: 3/1/2026

Sender Names: 6847: Susan St Louis

Emails: 6847: suesaint24@gmail.com

Organizations:

Subject: Colorado River negotiations

DOI - . To Whom It May Concern:I am a resident of the Coachella Valley, and I am greatly concerned about the future division of water in the Colorado River watershed. The Salton Sea has been a part of the Colorado River watershed for thousands of years. I believe that it is vital to include it in the coming negotiations, because the drying of the Salton Sea will create an environmental disaster for Southern California, negatively impacting the environment, health and air quality in my community and the region as a whole. I believe that if it continues it will have negative long-term impacts on our economy, specifically property values and tourism and health of residents and visitors.Because demand for water is always increasing, and water sources are already at their limit, we have to find new sources of water for residential, commercial and agricultural uses. We can't just keep dividing up the Colorado River water - there isn't enough of it. We must look at ocean water importation and desalination as the long-term remedy to address Colorado River shortages and the declining Salton Sea.Please factor in the Salton Sea as part of the Colorado River for any future water allocations and extend the existing agreement for five years until an agreement can be made amongst all states and other remedies can be explored.Thank you for your consideration.Susan St LouisThe Salton Sea Coalition

Letter #: 7459

Date Received: 3/2/2026

Sender Names: 7415: Kerry Starr

Emails: 7415: kmatha60@mac.com

Organizations:

Subject: Opposition to Proposed Post-2026 Operational Guidelines for Lake Powell and Lake Mead – Draft EIS

DOI - . To the Bureau of Reclamation and the U.S. Department of the Interior: I am writing in strong opposition to the proposed Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead as outlined in the Draft Environmental Impact Statement. While I understand the gravity of managing a severely stressed river system, the proposed framework is fundamentally unjust to Arizona -- and the data makes this impossible to ignore. Arizona is currently operating under Tier 1 shortage conditions, absorbing an 18% reduction in its Colorado River water supply -- 512,000 acre-feet -- with cuts falling hardest on municipalities, agricultural communities, and tribal nations across Maricopa, Pinal, and Pima counties. These are real people, real communities, and real economies bearing real hardship. And yet, when we examine how water is allocated and used across the basin, the inequity is staggering. Utah holds an allocation of approximately 1.725 million acre-feet per year -- roughly 0.49 acre-feet per person. Arizona, by contrast, holds 2.8 million acre-feet for a population more than twice as large -- just 0.37 acre-feet per person. Utah already receives 32% more water per capita than Arizona on paper. Under the proposed alternatives, that gap widens further, because Upper Basin states like Utah face virtually no shortage triggers while Lower Basin states like Arizona absorb all the cuts. But here is where the injustice becomes truly indefensible: Utah is not even using its full allocation. The Upper Basin as a whole uses only about 4.5 million acre-feet per year out of its 7.5 million acre-foot entitlement. And of the water Utah does use, over 75% goes to agriculture -- with alfalfa alone consuming 45% of the state's total water supply. A full 68% of Utah's diverted water goes to alfalfa and hay production. This water is not feeding Utahns. It is not sustaining Western communities. A substantial portion of it is being exported overseas -- to China, Japan, Saudi Arabia, and the United Arab Emirates. Twenty-nine percent of Utah's hay harvest by value is shipped abroad, with two-thirds going to China alone. Saudi Arabia, which banned its own farmers from growing alfalfa in 2018 because it had depleted its own groundwater, is now effectively importing American water embedded in hay -- water drawn from the same overtaxed Colorado River that Arizona cities, farms, and tribes are being told they can no longer access. To add insult to injury, Saudi-owned companies -- including Fondomonte Arizona, a subsidiary of Almarai Co. -- are farming alfalfa directly on Arizona soil, drawing from Arizona's own groundwater, and shipping the harvest back to the Middle East. Arizona's Attorney General has called this outrageous. She is right. Our water is not an export commodity. It is the lifeblood of our state. It supports our cities, our families, our tribal nations, and our future. Every acre-foot lost to overseas alfalfa exports is an acre-foot that Arizona cannot use to sustain the communities that are already under mandatory shortage restrictions. The proposed Post-2026 framework does not address this. It asks Arizona to sacrifice more while leaving Upper Basin states -- and the export agriculture economy that consumes their water -- largely untouched. That is not equitable water management. It is a structural failure that demands correction. I urge the Bureau of Reclamation to: 1. Withdraw the current Draft EIS and revise it to address the disproportionate burden placed on Lower Basin states. 2. Incorporate meaningful use-it-or-lose-it provisions that discourage unused Upper Basin allocations from being banked while Lower Basin communities face cuts. 3. Establish enforceable restrictions on the use of Colorado River Basin water -- including groundwater -- for the production of export crops, particularly by foreign-owned agricultural operations. 4. Treat water as a public trust resource that must first serve the needs of Basin residents before it serves overseas markets. Arizona has played by the rules. We have invested in conservation, we have taken our cuts, and we have done so in good faith. We will not accept a framework that asks us to sacrifice even more while other states export our shared river overseas. Respectfully, Kerry Starr, MSc Stanford University Scottsdale, AZ starrlightk@gmail.com

Letter #: 657

Date Received: 2/25/2026

Sender Names: 647: Jack Stauss

Emails: 647: jack@saveourcanyons.org

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits.I have spent years of my life on the Colorado River in Cataract and Glen Canyons, and those places must have strong protections and a pathway for restoration of the lands and tributaries. Specifically, the new Colorado River guidelines must:- Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems.- Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology cannot fill either Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin. - Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin. - Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights. Thank you for your consideration.Jack

Letter #: 1366

Date Received: 2/26/2026

Sender Names: 1355: Lew Steiger

Emails: 1355: lsteiger@aol.com

Organizations:

Subject: Comments re: the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft EIS

DOI - . Thanks for all the hard work that has gone into this over the years and the opportunity to comment now during this critical time.I have been a commercial boatman in the Grand Canyon since 1972. I've run almost every kind of boat there is down there and am a past President and former board member of Grand Canyon River Guides. I applaud and second everything that GCRG have said in their official comments to you for this process.I know that when you consider the millions of people now depending on this water for life itself, the concerns of a relatively few "recreationists" will seem insignificant. But I do want to emphsize that we need about 8,000 cfs to get through there safely. Not an average of 8,000 cfs, a minimum of 8,000 cfs.I was there throughout the season in 2023 and the tragedy of that year in my mind was that we'd had a good wet winter and then the Bureau squandered all that water in one fell swoop by releasing 9 million acre feet that fiscal water year and then immediately shutting the water off that September with no warning. So the upshot was that all summer we saw fluctuating flows approaching 20,000 cfs and then suddenly, with literally no warning, we saw flows that ranged from 8,000 to 5,000 cfs, which averaged out to about 6,000 in a practical sense.The first day you dropped the water out on us, I stood on shore scouting a rapid and watched a lady riding with another company get thrown into the load of the boat she was riding on and break her neck. She dropped like a rock and was instantly paralyzed from the neck down for life. There were many other significant accidents that took place during that time.I know that everybody involved here has their own agendas. I know that CREDA wants you to fluctuate as much as possible to further their ends. I just want to emphasize that for the health and safey of the river in Grand Canyon we really need that 8,000 cfs, at least, and that steadier flows in that 7k - 10k range are way better for us than cranking the water up and down resulting in the extreme flows we typically see during the big money times (summer and winter) for CREDA.I hope that you will keep that in mind as you fine tune the plan going forward. I see this one facet of the overall issue as basically a battle between us and CREDA. It doesn't seem to me that the water users will care that much about the fluctuations in the water leaving Lake Powell. But for us on the river in Grand Canyon those numbers are literally a matter of life and death.respectfully, Lew Steiger

Letter #: 4045

Date Received: 2/27/2026

Sender Names: 4000: Mia Stein-Kodzik

Emails: 4000: msteinkodzik@yahoo.com

Organizations:

Subject: CO River

DOI - . Protect the Colorado River now!!Mia Stein-KodzikSent from Yahoo Mail for iPhone

Letter #: 6386

Date Received: 3/1/2026

Sender Names: 6359: Jim Steitz

Emails: 6359: Jim.Steitz@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, ***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. 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.*** I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Jim Steitz 5330A Jamieson Ave Saint Louis, MO

Letter #: 8622

Date Received: 3/3/2026

Sender Names: 8544: Kelle Stephens

Emails: 8544: kellemilovichstephens@gmail.com

Organizations:

Subject: Please Pass the Lake Powell Abundance Act!!!

DOI - . Please pass the Lake Powell Abundance Act. It makes sense...common sense. Thanks Kelle Stephens

Letter #: 5223

Date Received: 2/28/2026

Sender Names: 5187: DStern/EPerry

Emails: 5187: filmyard@gmail.com

Organizations:

Subject: Colorado River Basin plan

DOI - . Please consider the comments below as you go forward with planning for the updated Colorado River Basin water management plan.The Colorado River's future requires a management framework that protects the river going forward for many decades. The Bureau must work in the uncomfortable reality of an already over-allocated river system in an environment of increasing water scarcity and must consider first and foremost the protection of the river's water quality, ecosystems and local communities and include Tribal treaty rights and consultation. Forcible demand reductions are needed as supply continues to decline. Water conservation measures must be demanded of users as part of a solution. I urge the Bureau to strengthen the Post-2026 Colorado River Basin Draft EIS and provide for extensive and inclusive public comment on its revised proposal before issuing its final decision.The upper basin states should not be expected to give up their rights to the water to fix overuse of lower states' mismanagement of their development and water use over the past decades. Thank you,E Perry and D SternCody, Wy and Chevy Chase, MD

Letter #: 11134

Date Received: 12/4/2024

Sender Names: 10748: Tyler Stettler

Emails: 10748: Stettty@gmail.com

Organizations:

Subject: Page 2299

I Support Recreation on the Colorado River Basin I am writing as a supporter and user of Lake Powell, Lake Mead and water in the west. I am a concerned citizen and supporter of responsible water and energy infrastructure management. I am writing regarding the proposed alternatives for the Post-2026 Colorado River Operation Guidelines. It is important to recognize the role that the dams within the Colorado River Basin play in ensuring energy reliability, irrigation, water storage, navigation, and regional economic stability. I appreciate the Bureau of Reclamation recognizing BlueRibbon Coalition's Path to 3588' Plan as an alternative considered and recreation as a whole in alternatives analyzed. Glen Canyon and Hoover Dam and the Colorado River Basin, face growing pressure from radical environmental activists and anti-dam interests who seek its decommissioning. These calls threaten the dam's essential functions on the Colorado River system, therefore we appreciate BOR recognizing that moving to a one dam system would not yield a resilient system and would be bad for the environment and the economy. As a recreation user, I support any alternative that recognizes and supports recreational opportunities within the Colorado River Basin. The Supply-Driven, Max Operational Flexibility and Enhanced Coordination Alternatives all identify release levels based off of low water levels, shortages or low inflows which will better protect the dams critical infrastructure. I support any alternative or blend of alternatives in which releases are based off of real water inflows and not maximum deliveries that could hurt the water storage system and ultimately recreation. I support keeping the most water in the reservoirs for recreation as possible. The nation cannot afford to treat these critical infrastructure assets as bargaining chips in speculative environmental campaigns. Lake Powell and Lake Mead are too important to lose, and its operation must be protected. This is truly a beautiful blessing to the southwest. Not only is it a storage for time of need but it's also one of americas greatest pastimes and achievements. It stand for so much more than just a big cement plug in the canyon. It stand for many generations of memories, of old and young, past and present, but more importantly the future. We depend on lake Powell for the water, but also recreation and power. The life blood of an entire city. $635 million came from Glen Canyon recreation in $2024. That would cripple a small town like page. After the shut down of the power plant. Page would become a ghost town. Page can not afford to have a data center built there and the Colorado river will not Post-2026 Colorado River 2299 of 5176 survive that either. We truly need to follow or more align our energy and power towards the Blue ribbon coalition and the Colorado River Abundance Act. This is critical for the reservoir, community and everything else that Glen Canyon stands for. I truly hope that you see what a beautiful landmark. This is for the state of Arizona for the power generation for multiple states and for the water capacity for the lower basin. Thanks for your time and understanding in this and I am pro Lake Powell and distributing water appropriately so that there is no more waste. Post-2026 Colorado River

Letter #: 8240

Date Received: 3/2/2026

Sender Names: 8162: Don Steuter

Emails: 8162: dsteuter@hotmail.com

Organizations:

Subject: Comment on Bureau of Reclamation Post 2026 Colorado River

DOI - . Comments on Bureau of Reclamations Post 2026 Plan for Colorado River Operations March 2, 2026 Please encourage all the basin states to consider the limitations of living in an arid part of the country and find ways to moderate the endless growth and sprawl that now plagues most of our urban areas. We need to admit that the days of big water projects such as replumbing the west's rivers and devising schemes to pump our remaining groundwater from distant basins are over. Otherwise the results will be, in the short term, more unsustainable growth, and then, increasing social divisions with the wealthy having access to most of the water. There is precedent for the federal government encouraging states to put limits on themselves. In the late 1970's, Interior Secretary Cecil Andrus and Arizona Governor Bruce Babbitt concocted an idea to bring the big groundwater pumpers in the state to the bargaining table by making construction of the Central Arizona Project contingent on passing a groundwater management act. The plan worked, and Arizona's GMA of 1980 has long been hailed as a good model and starting point for all the western states. The basin states, and the feds, can begin the process by getting rid of the endless government subsidies for growth in the West. For more information on this, give all the water managers a free copy of Frank Welsh's "How to Create a Water Crisis." While you're at it, give them all a copy of Marc Reisner's "Cadillac Desert" (it's time they've re-read it), and copy of Paolo Bacigalupi's "The Water Knife." Then bring them all back to the table for a discussion, and hopefully action, on reigning in the mindless and ruinous growth in our southwest deserts. Thanks for the opportunity to comment, Don Steuter Phoenix, AZ

Letter #: 3713

Date Received: 2/26/2026

Sender Names: 3676: Stevedotg

Emails: 3676: stevedotg@gmail.com

Organizations:

Subject: The Colorado River’s future depends on bold action, not incremental adjustments.

DOI - . Our Drinking Water Is at RiskThe Colorado River provides drinking water for40 million people, supports Tribal nations, sustains farms and cities, and is the lifeblood of fragile desert ecosystems.But the Basin is facing:Record-low reservoir levelsIncreasing salinity and pollution risksCollapsing aquatic habitatsRising temperatures and reduced snowpackGrowing threats to safe, reliable water suppliesThis EIS must reflect the reality of climate-driven water scarcity and prioritizeclean water protections, ecosystem health, and equitable solutions, not simply divide up a shrinking supply.The Draft EIS the Bureau has proposed is inadequate to address the crisis that we face, and the agency has failed to reveal what its preferred alternative will be. This denies the public the only real opportunity we will have to comment on the inadequacies of the Bureau's proposal before a final decision is made. We must demand that our communities have a full opportunity to express our concerns before the government takes final action.The Solutions We NeedWe urge the Bureau of Reclamation to strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocationsHow You Can SupportSubmit your comment by March 2, 2026Tell the Trump Administration's Bureau of Reclamation:The Colorado River's future depends on bold action, not incremental adjustments.We need a management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to address the full reality of climate-driven water scarcity and the urgent need to protect water quality, ecosystems, and Basin communities.I urge the Bureau of Reclamation to significantly strengthen the Post-2026 Colorado River Basin Draft EIS that proactively addresses the crisis that we face and ensure the public has an opportunity to comment on its revised proposalbefore issuing its final decision.The Colorado River is already overallocated and shrinking. The Bureau must prioritize long-term sustainability, meaningful Tribal consultation, and enforceable reductions in demand, not simply identify new ways to divide a declining supply. The Colorado River cannot afford delay.Add your voice today -- for clean water, healthy ecosystems, and a livable future across the Basin.Thank you for taking action.

Letter #: 569

Date Received: 2/24/2026

Sender Names: 559: Patti Stevens

Emails: 559: pattistevensandmerlynn@comcast.net

Organizations:

Subject: Comment for draft post-2026 EIS - please address comment #1MDBender

DOI - . In regards toPost-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead please address the following comment #1MDBender: Let sleeping dogs lie. Federal agencies have no constitutional nor legal basis for cracking open the Colorado River Compact to amend that long-standing agreement. Any proposed changes or step-in by federal agencies during droughts are federal overreach. The draft post-2026 EIS inadequately addresses systematic future (No-Action alternative) shortages. During the early-1980s floods, Glenn Canyon Dam almost failed because of severe internal damage to river outlet works, and environmental groups have proposed removing Glenn Canyon Dam. The unpredictable future (the exact No-Action alternative) cannot be modeled. Because the assumptions used in the modeling analysis are inadequate, the detailed modeling results are inadequate and may not hold water in court. Don't get bit. Thank you Merlynn D. Bender, 7255 W. Kentucky Avenue, Lakewood, CO 80226 (February 24, 2026)

Letter #: 417

Date Received: 2/19/2026

Sender Names: 411: John Stewart

Emails: 411: jrstewart3@cox.net

Organizations:

Subject: Colo Riv problem

DOI - . My solution would be to stop all residential building construction in Las Vegas and all along the River.John Stewart702-360-3170jrstewart3@cox.net

Letter #: 3417

Date Received: 2/26/2026

Sender Names: 3386: George Stimpson

Emails: 3386: gstimpson@mac.com

Organizations:

Subject: water protection

DOI - . Protect our precious water sources and stop ruining the lives of 49 million Americans, morarch butterflies and the !st Nation peoples. George Stimpson

Letter #: 4366

Date Received: 2/28/2026

Sender Names: 4333: Sue Stoudemire

Emails: 4333: Sue.Stoudemire@messages.fwwatch.org

Organizations:

Subject: Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, We must protect OUR WATERS, ... or ELSE We must protect the Colorado River Please, Bureau of Reclamation, do your job The Colorado River is IN TROUBLE Please use your authority to see that the Basin states come up with a joint agreement that accepts mandatory conservation measures that limit corporate water abuses. Overuse by major agribusiness and tech corporations threatens the basin and water supply for 40 million people To handle this major threat of collapse, any plan must include an immediate STOP to the expansion of alfalfa, mega dairies, and data centers, and a significant rollback of the crop cultivation that consumes large quantities of water and is not suited to growth in highly arid climates. The vast majority of water from the Colorado River is used by big agribusiness, primarily for growing alfalfa, a feedstock for cattle on factory farms. Across all seven Basin states, alfalfa farms consumed an estimated 2.1 trillion gallons of water in 2025, enough for the Basin's 40 million people for nearly 3 1/2 years. Mega dairies, which produce significant pollution and threaten drinking water, consumed 82 billion gallons of water in 2022 across the Basin states (excluding Wyoming, for which no data were available). These agricultural uses are not efficient. Basin states applied 2.6 acre feet of water/acre - 70% higher than the US average - for crops ill-suited to arid climates. Finally, big technology companies across the Basin states are deploying water-hungry data centers with little regulation or regard for impacts on water resources. The Colorado River is significantly overstretched. Every environmental analysis and plan for the future must consider how the River's resources are being used. The overuse of the Colorado River by big agribusiness and technology corporations - with already record-low water levels and drought - has serious consequences that threaten accessible drinking water for 40 million people! I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Sue Stoudemire 2302 Dellwood Dr NW Atlanta, GA

Letter #: 1326

Date Received: 2/24/2026

Sender Names: 1315: Richard Strauss

Emails: 1315: rstrouts@gmail.com

Organizations:

Subject: Eat Less Water

DOI - . Eat Less Water.

Letter #: 3714

Date Received: 2/27/2026

Sender Names: 3677: Robert Swift

Emails: 3677: ruswift@yahoo.com

Organizations:

Subject: water

DOI - . we need the Colorado to be as eco-friendly in the future as it has beenfor many moons.in which the many states are in need of its source.The scale of its effect is impossible to measure.We are counting on a common sense resolution.We all benefit when we rightly use common sense.

RICHARD P. SYBERT
5650 N. Placita de la Noche
Tucson, Arizona 85718
tel (206) 321-5222
email rsybert@grsm.com

January 19, 2026

by email *crbpost2026@usbr.gov*

Bureau of Reclamation
Attn: BC00-1000
P.O. Box 61470
Boulder City, NV 89006

re: Public comment on BOR draft environmental impact statement on Colo. River

Dear Bureau of Reclamation:

I respectfully submit the following public comment on the new Bureau of Reclamation draft environmental impact statement on the Colorado River.

I am the former California State Director of Planning and Research (1991-93), where I also served as Chair of the State's Growth Management Commission, and the Interagency Commission on Geographical Information Systems. From 1993 to 1998 I served as the Public Member on the Santa Monica Mountains Conservancy. I am currently a second year PhD candidate in geography at the University of Arizona with a focus on water supply and infrastructure issues.

I recognize that the Bureau has to operate within an existing historical and legal framework, including that (1) the federal government's legal authority to impose water allocations on the Lower Basin state is clear-cut, but less so on the Upper Basin states; (2) California has a priority over Arizona's junior allocation rights under Section 301(b) of the Colorado River Basin Project Act, 43 U.S.C. §1521(b).[1]

Nevertheless I would like to suggest that the only fair, equitable, and just approach to a diminishing Colorado River flow and water supply is to treat all users equally. Therefore, any cuts should be allocated in proportion to current use and population, with allowance for subsequent adjustment accordingly. If federal authority is currently insufficient to take this approach, then new legislation should be sought. The growth and development of our region should not be held hostage to aging historical precedent or ambiguous legislation.

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[1] Although I note this has been questioned, see Dozier and McCann, "Restoration of CAP's Priority to Colorado River Water," Continuing Legal Education presentation (2004).

Of the four alternatives presented in this EIS, the "Enhanced Coordination" and "Supply Driven" Alternatives seem the least bad, but they all suffer from these criticisms. The fundamental obstacle to a fair agreement here is the Upper Basin states' refusal to agree to take proportional cuts.

Respectfully submitted,



Richard P. Sybert

Letter #: 3412

Date Received: 2/25/2026

Sender Names: 3381: Marieke Taney

Emails: 3381: Marieke.Taney@nau.edu

Organizations: Northern Arizona University

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits.As a 25-year Non-Motorized River Guide and Trip Leader in Grand Canyon I am very concerned about water in Grand Canyon and maintaining a healthy ecosystem in one of the 7-natural wonders of the world. The new Colorado River guidelines must:Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems.Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology cannot fill either Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin.Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin.Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights.As a 25-year Non-Motorized River Guide and Trip Leader in Grand Canyon I am very concerned about safety along the river corridor, specifically under the Enhanced Coordination and Maximum Flexibility Alternatives:Non-motorized and motorized trips would become more dangerous in the future unless the Supply Driven or Basic Coordination Alternatives are selected. I support the continuation of motorized travel as embodied in the Colorado River Management Plan because it offers an alternative means to access the Grand Canyon for large segments of the population who otherwise would never witness firsthand the sublime beauty and awe of the inner canyon. I believe that minimum flows of 8,000 cfs during the motor season from April 1 through September 15 each year are a necessity. Based on my experience, 5,000 cfs is not a "safe whitewater boating threshold" for non-motorized or motorized trips alike. This DEIS acknowledges serious boating accidents, life-threatening injuries, and damaged equipment that occurred during September 2023 after flows were reduced to 5,000 cfs. (DEIS, TA 14.2.4). I would like to impress upon the BOR that every 1,000 cfs +/- makes a difference for boaters in terms of navigability and safety for the over 20,000 people who run the Colorado River through Grand Canyon each year. Maintaining a robust recreational river running industry in Grand Canyon National Park is also critical to the health of our regional economy. The Colorado River through Grand Canyon is not a pipeline, but a sacred place and living river with complex and interrelated resources and associated values that must be protected in perpetuity. The legal obligations of the Grand Canyon Protection Act, the Endangered Species Act, the National Park Organic Act, and the National Historic Preservation Act, underpin the Long Term Experimental and Management Plan as part of the Glen Canyon Dam Adaptive Management Program. Thank you for your consideration.R. Marieke Taney (She/Her)Teaching Professor Northern Arizona University |Department of Geography, Planning and Recreation |Parks and Recreation Management |Outdoor Education & Leadership (OEL)Phone: (928) 523-2384"Find what you love, Love what you find

Letter #: 231

Date Received: 1/29/2026

Sender Names: 232: Katherine Tara

Emails: Not Provided

Organizations:

Subject: CR DEIS Public Meeting Comments

Does Reclamation anticipate that the modified legal authorities required for the majority of alternatives will be in place and resolved before water year 2027 begins?

Letter #: 3551

Date Received: 2/26/2026

Sender Names: 3518: Cynthia Taylor

Emails: 3518: cynergizer@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Water usage

DOI - . Dear Carly Jerla Bureau of Reclamation, I am an avid whitewater kayaker, and I have paddled the full length of the Grand Canyon wilderness area 3 times. There is no wilderness experience more iconic than our Grand Canyon. Please preserve adequate water flows to support recreational usage of this river. Occassional high flow is important to transfer nutrients and sediment. Glen Canyon dam infrastructure must be updated to support lower levels. Water conservation must be implemented across the river ecosystem so as to support reasonable river flows for river ecology. Sincerely, Ms Cynthia Taylor 1743 NE 92nd St Seattle, WA 98115-3253 cynergizer@gmail.com

Letter #: 3490

Date Received: 2/27/2026

Sender Names: 3458: laura taylor

Emails: 3458: pitttaylor@gmail.com

Organizations:

Subject: CO river

DOI - . Please take a moment and reintroduce yourself to your brain and begin the education of you and your connection with this planet. We need ecological systems, biodiversity, a clean healthy planet to survive. Protect the Colorado River and as many other natural lands and waters as possible!!!!!!!!

Letter #: 2

Date Received: 1/29/2026

Sender Names: 2: Mark Taylor

Emails: 2: mtaylor@westlandresources.com

Organizations:

Subject: Draft Environmental Impact Statement for Post-2026 Colorado River Operations

DOI - . I just wanted to see if today's meeting was recorded for those of us who could not attend. Thanks Mark

Letter #: 3425

Date Received: 2/26/2026

Sender Names: 3394: Tom Taylor

Emails: 3394: tomtaylor0401@gmail.com

Organizations:

Subject: Please protect the Colorado River

DOI - . As a community volunteer active in watershed protection efforts, I urge the Bureau of Reclamation to significantly strengthen the Post-2026 Colorado River Basin Draft EIS that proactively addresses the crisis that we face. I also ask the Bureau to ensure that the public has an opportunity to comment on its revised proposalprior to issuing its final decision.The Colorado River's future needs bold action and a comprehensive management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to address the full reality of climate-driven water scarcity and the urgent need to protect water quality, ecosystems, and Basin communities.The Colorado River is already overallocated and shrinking. The Bureau must prioritize long-term sustainability, meaningful Tribal consultation, and enforceable reductions in demand, not simply identify new ways to divide a declining supply. The Bureau has an opportunity to set an example of responsible stewardship of our water resources that can be a learning model for watersheds across the nation. I urge that you act with that in mind.Sincerely,Tom TaylorWatershed Volunteer

Letter #: 1385

Date Received: 2/25/2026

Sender Names: 1374: Tracey Taylor

Emails: 1374: traceyt2016@gmail.com

Organizations:

Subject: Comment on Colorado River

DOI - . To Whom It May Concern:As a resident of Coachella Valley, I believe that the Salton Sea should be considered part of the Colorado River watershed. The Salton Sea is being forgotten in the Colorado River water negotiations, and it should be factored in because it is creating an environmental disaster that is negatively impacting the environment, health and air quality in my community. I believe that if it continues it will have negative long-term impacts on our economy, specifically property values and tourism and health of residents and visitors.I also advocate for water importation and desalinization as a long-term remedy to address Colorado River water shortages and the declining Salton Sea.Please factor in the Salton Sea as part of the Colorado River for any future water allocations and extend the existing agreement for five years until an agreement can be made amongst all states and other remedies can be explored.Thank you for your consideration.Sincerely,Tracey Taylor

Letter #: 3520

Date Received: 2/26/2026

Sender Names: 3487: Beth Thomas

Emails: 3487: beththomas1@gmail.com

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I am writing regarding the Draft EIS for Post-2026 Operational Guidelines for Lake Powell and Lake Mead. I strongly urge the Bureau to fully analyze river-level bypass of Glen Canyon Dam and consider management options that would allow the Colorado River to flow freely through Glen Canyon once again. I also encourage a thorough study of a "Fill Mead First" approach, prioritizing Lake Mead before Powell, since current hydrology does not support filling both reservoirs simultaneously. Seeing the canyon reemerge in recent years has demonstrated its ecological, cultural, and recreational value, and these restored resources deserve meaningful consideration in future planning. Please prioritize long-term river health, operational flexibility, and sustainable management of the Basin.

Sincerely,Beth Thomas

Letter #: 701

Date Received: 2/26/2026

Sender Names: 691: Jeremy Thomas

Emails: 691: jthomas.riverman@gmail.com

Organizations:

Subject: Colorado River Guidelines comment

DOI - . To USBR-I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits.Specifically, the new Colorado River guidelines must:1) Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems.2) Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology does not support filling both Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue needlessly drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin. 3) Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin.4) Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights.5) Consider continued recreational flows for commercial and non-commercial rafting through GCNP.Thank you for your consideration.Sincerely,Jeremy Thomasjthomas.riverman@gmail.commobile: 510-919-5402

Letter #: 1606

Date Received: 2/26/2026

Sender Names: 1595: Jack Thomsen

Emails: 1595: thomsenjack9@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, I was lucky enough to go on a 21 day trip on the Colorado in the Grand Canyon. It was the most special experience of my life. Save the Colorado and fill mead first! Bring back glen canyon and preserve flow in the Grand Canyon! Sincerely, Mr Jack Thomsen 1091 Ripley Rd Waterbury Center, VT 05677-4406 thomsenjack9@gmail.com

Letter #: 9338

Date Received: 12/4/2024

Sender Names: 9218: Howard Thorpe

Emails: 9218: hwt222@aol.com

Organizations:

Subject: Page 0436

I Support Recreation on the Colorado River Basin I am writing as a supporter and user of Lake Powell, Lake Mead and water in the west. I am a concerned citizen and supporter of responsible water and energy infrastructure management. I am writing regarding the proposed alternatives for the Post-2026 Colorado River Operation Guidelines. It is important to recognize the role that the dams within the Colorado River Basin play in ensuring energy reliability, irrigation, water storage, navigation, and regional economic stability. I appreciate the Bureau of Reclamation recognizing BlueRibbon Coalition's Path to 3588' Plan as an alternative considered and recreation as a whole in alternatives analyzed. Glen Canyon and Hoover Dam and the Colorado River Basin, face growing pressure from radical environmental activists and anti-dam interests who seek its decommissioning. These calls threaten the dam's essential functions on the Colorado River system, therefore we appreciate BOR recognizing that moving to a one dam system would not yield a resilient system and would be bad for the environment and the economy. As a recreation user, I support any alternative that recognizes and supports recreational opportunities within the Colorado River Basin. The Supply-Driven, Max Operational Flexibility and Enhanced Coordination Alternatives all identify release levels based off of low water levels, shortages or low inflows which will better protect the dams critical infrastructure. I support any alternative or blend of alternatives in which releases are based off of real water inflows and not maximum deliveries that could hurt the water storage system and ultimately recreation. I support keeping the most water in the reservoirs for recreation as possible. The nation cannot afford to treat these critical infrastructure assets as bargaining chips in speculative environmental campaigns. Lake Powell and Lake Mead are too important to lose, and its operation must be protected. I am writing to submit comments in support of the Enhanced Coordination Alternative as my first choice for the Post-2026 Colorado River Operational Guidelines, and the Maximum Operational Flexibility Alternative as my second choice. The Enhanced Coordination Alternative provides the most balanced and responsible path forward. By formally coordinating operations between Lake Powell and Lake Mead and adjusting releases based on conditions at both reservoirs, this approach reduces the risk of either reservoir reaching critically low elevations. Proactively balancing storage levels strengthens system resilience, protects hydropower Post-2026 Colorado River 436 of 5176 generation and critical infrastructure, and promotes long-term sustainability across the basin. Importantly, this alternative recognizes the need to respond earlier to declining conditions rather than waiting for crisis thresholds. In an era of prolonged drought and reduced inflows, a coordinated strategy that prevents catastrophic drawdowns is both fiscally and operationally prudent. As a second choice, I support the Maximum Operational Flexibility Alternative. While more aggressive, it prioritizes infrastructure protection and allows the Bureau to respond adaptively to worsening hydrologic conditions. Preserving operational integrity at Glen Canyon Dam and throughout the system must remain a top priority. Maintaining viable reservoir elevations is essential not only for water delivery and power generation, but also for recreation, tourism economies, and the communities that depend on stable lake access. Protecting recreation is fully compatible with responsible water management when operations are grounded in realistic hydrologic conditions. I respectfully urge you to adopt the Enhanced Coordination Alternative, or a final framework that incorporates its core balancing principles, to ensure a stable, resilient Colorado River system through 2060. Thank you for your consideration. Action needs to be taken immediately!

Letter #: 1450

Date Received: 2/26/2026

Sender Names: 1439: James Tibensky

Emails: 1439: jtibensky@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, I want you to consider my opinions on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - Draft Environmental Impact Statement (Post-2026 Operations). I want you to protect the future of the Colorado River Basin and to recognize the many ecosystem services that the river and its tributaries provide. I want the Bureau of Reclamation to work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river for generations to come. I also want the following to be considered and acted upon: Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. Infrastructure updates at Glen Canyon Dam must be prioritized in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. Conservation measures and delivery of water between the Upper and Lower Basins must balance maintaining minimum flows at all times in the Grand Canyon with allowing for flow variability across the annual hydrograph to support both the river ecosystem and river recreation opportunities. Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities, and seek to provide multiple benefits whenever possible. Impacts to river recreation opportunities on the Colorado River and the San Juan River due to changing reservoir levels must be analyzed and mitigated. Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. I have kayaked through the Grand Canyon four times, and the trips changed my life. Keeping the river flowing and healthy is integral to protecting the safety and welfare of the people who rely on it as well as maintaining the important recreational opportunities it provides. We must work with what nature provides and do so together. All of the Colorado River's water users are going to feel a strain, but we cannot sacrifice these special river canyons and the ecosystem services that they provide. Sincerely, Mr. James Tibensky 31 W665 Nancy Ln Wayne, IL 60184-2336 jtibensky@att.net

Letter #: 5565

Date Received: 2/28/2026

Sender Names: 5529: Judy Tiberi

Emails: 5529: judytiberi@gmail.com

Organizations:

Subject: Please Protect the Colorado River

DOI - . Judy Tiberi via mobile

Letter #: 18

Date Received: 1/18/2026

Sender Names: 17: James Tuthill

Emails: 17: tuthill@pacbell.net

Organizations:

Subject: Colorado River water allocation

DOI - . Hello, I am filing these comments about the USBR's new draft environmental statement on the Colorado River. I live in both CO and AZ. All seven states must make water reductions using conservation methods. My understanding is that cities such as Denver have no water conservation programs. They should. It is wrong and unfair to determine allocations and reductions based on agreements made almost 100 years ago. The populations have changed since the original compact was established and USBR needs to recognize and base its decision on that fact. It is only fair today to determine allocations and reductions based on the present needs of users not on an antiquated so-called "compact." No one then anticipated today's shortages. The upper basin states have refused to accept any reductions. They need to be told they have to accept reductions and implement conservations programs. All users of the seven states should be treated equally. Thank you, James Tuthill, Oro Valley AZ and Silverthorne CO

Letter #: 7982

Date Received: 3/2/2026

Sender Names: 7919: Bradley H. Udall

Emails: 7919: bradley.udall@gmail.com

Organizations:

Subject: DEIS Comments - Please report Total Diversions by Basin

DOI - . Dear Sir or Madam: I appreciate the effort that went into producing the DEIS. I would like to see formal analysis that reports total diversions (i.e. consumptive uses) by basin using the DMDU framework. Analyses that just focus on shortages miss this important metric. Please include in these analyses how an increasing-thru-time Upper Basin Depletion Schedule changes the diversions by basin. Sincerely yours, Brad Udall

Letter #: 8251

Date Received: 3/2/2026

Sender Names: 8173: Jennifer Valentine

Emails: 8173: faboo1028@gmail.com

Organizations:

Subject: The Colorado River's future depends on bold action, not incremental adjustments. We need a management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to

DOI - .

Letter #: 3464

Date Received: 2/26/2026

Sender Names: 3433: Deborah Valianti

Emails: 3433: dlvalianti@gmail.com

Organizations:

Subject: Draft DIS

DOI - . I support strengthening Draft DIS. Thank you for your time and attention. Yours truly, Deborah Valianti

Letter #: 3766

Date Received: 2/26/2026

Sender Names: 3433: Deborah Valianti

Emails: 3433: dlvalianti@gmail.com

Organizations:

Subject: Draft EIS

DOI - . Sorry, per above message, I meant Draft EIS. Deborah Valianti

Letter #: 3950

Date Received: 2/26/2026

Sender Names: 3907: Heather G. Vasquez

Emails: 3907: heathergordon2282@gmail.com

Organizations:

Subject: Please Protect the Colorado River

DOI - . Dear Officials, The Colorado River's future depends on bold action, not incremental adjustments.We need a management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to address the full reality of climate-driven water scarcity and the urgent need to protect water quality, ecosystems, and Basin communities.I urge the Bureau of Reclamation to significantly strengthen the Post-2026 Colorado River Basin Draft EIS that proactively addresses the crisis that we face and ensure the public has an opportunity to comment on its revised proposal before issuing its final decision.The Colorado River is already overallocated and shrinking. The Bureau must prioritize long-term sustainability, meaningful Tribal consultation, and enforceable reductions in demand, not simply identify new ways to divide a declining supply. Thanks in advance, -- Heather VasquezDenver, CO818.723.7650This email may be legally privileged and/or confidential and is intended only for the use of the addressee(s). No addressee should forward, print, copy, or otherwise reproduce this message in any manner that would allow it to be viewed by any individual not originally listed as a recipient. If the reader of this message is not the intended recipient, you are hereby notified that any unauthorized disclosure, dissemination, distribution, copying or the taking of any action in reliance on the information herein is strictly prohibited. If you have received this communication in error, please immediately notify the sender and delete this message.

Letter #: 3595

Date Received: 2/26/2026

Sender Names: 3561: Alessandra Vellucci

Emails: 3561: vellucac@everyactioncustom.com

Organizations:

Subject: Fill Mead First- the dam is unsustainable!

DOI - . Dear Carly Jerla Bureau of Reclamation, To whom it may concern, I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits. Specifically, the new Colorado River guidelines must: 1. Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems. 2.Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology does not support filling both Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue needlessly drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin. 3. Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, and cultural sites. These resources must be given equal value to other resources across the Basin. 4. Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights. Thank you for your consideration. Sincerely, Alessandra Vellucci Sincerely, Dr. Alessandra Vellucci 2496 Apex Ave Unit A Grand Junction, CO 81505-7075 vellucac@gmail.com

Letter #: 16

Date Received: 1/19/2026

Sender Names: 15: Gary Vesperman

Emails: 15: garyvesperman@yahoo.com

Organizations:

Subject: Technical solutions to Lake Mead water shortage

DOI - . Please incorporate these technical solutions to the Lake Mead water shortage into your public comments re the Post-2026 Draft Environmental Impact Statement.Clean energy inventions offer safe, clean, cheap fuel-less sources of constant energy. They compare favorably with 'renewable energy sources' such as solar farms and wind turbines which generate cumbersome intermittent electricity that are still somewhat expensive and require backups.The Gallery of Clean Energy Inventions is linked in https://app.box.com/v/cleanenergyexhibit and padrak.com/vesperman. The exhibit displays profiles of 31 Larger Generators, 36 Smaller Generators, 30 Advanced Self-Powered Electric Vehicle Innovations, 29 Radioactivity Neutralization Methods, 30 Space Travel Innovations, 25 Technical Solutions to Water Shortages and a Torsion Field School Network.The framed version of the exhibit with setup details is linked athttps://padrak.com/vesperman/Gallery%20of%20Clean%20Energy%20Inventions%20Exhibit%20with%20Setup%20Details%2010.18.23.pdf. This version of the Gallery of Clean Energy Inventions includes exhibit setup instructions, 50 movie posters and 80 Hubble Space Telescope images - 334 pages. The invention profiles remain the same.Do you know of a location that could be appropriate for an exhibition?My website padrak.com/vesperman also includes this:Water Inventions"Possible Technical Solutions to Lake Mead Water Shortage (Rev. 12.16.24, 12.15.24, 5.28.18, 4.18.16, 4.9.16, 6.28.14, Rev. 2.3.14, and Rec. 1.25.14) (*.pdf file)This article has 88 pages.I am confident that implementing some of these technologies will refill Lake Mead.Gary Vesperman, BS Electrical Engineering, University of Wisconsin-Madison 19681303 Darlene Way 202ABoulder City, NV 89005-3337702-435-7947padrak.com/vesperman-------Attachment (Clean Energy Inventions list.docx) START-------Clean Energy InventionsA portfolio of disruptive inventions has been accumulated after more than two decades of research and collaboration with numerous inventors, a few of whom are among the world's most productive. These inventions are so radical that some may require tens of millions of dollars each to fully exploit. $1 billion would establish a comprehensive proactive clean energy inventions evaluation and development organization headquartered in Nevada. Divisions would include Board of Directors, Corporate Library, Consultants, Teaching Institute, Technical Evaluation and Advisory Board, and Incubator of Russian and Ukrainian Inventions.Larger Generators – hydro-magnetic dynamo, focus fusion, hydrino generator, thorium power pack, global wireless transmission of electrical power, I.N. Frantsevich Institute of Problems of Materials Sciences thorium-232 energy accumulator, cosmic induction generator, colliding plasma toroid fusion reactor, wind turbine conversion, electrino fusion power reactor, induction coil coating increases generator output by one-third, Magnatron – light-activated cold fusion magnetic motor, Spintronic generator, WIN zero point electrical energy converter, plasma biomass gasification, nano-membrane pyro-gasification process, high-temperature incinerator, gas-phase catalytic fusion, phase-conjugate-resonator Tesla coil, protein nanowires, ball lightning fusion reactor, Nano-Boxx thermionic converter, direct energy conversion, solar radiant energy, and geothermal atmospheric liquefied thorium reactor.Smaller Generators – Casimer-layered electrodynamic generator, thin-film power generating disks, Testatika free energy machine, high-density charge clusters technology, energy catalyzer, cold fusion reactor with electric-to-thermal energy conversion, hybrid cold fusion hydrogen reactor, fiber-based cold fusion power cell, buried contact multijunction thin-film solar cell, thermoelectric generator, converter of zero-point electromagnetic radiation to electrical energy, neutrinovoltaic generator, LANR, pulsed abnormal glow discharge reactor, self-recharging energy generating gel cells, electronically shaded photo-voltaic glass, MulTask Dome multiple-output omni-directional solar power generator, high-expansion magnetohydrodynamic liquid metal generator, Power Chip thermo-ionic generator, liquid Hy-Fuel, gravity force generator, multifactorial hydrogen reactor, laser-induced fusion, protium H+ stoichiometric hydrogen gas generator, advanced solar photo-voltaic crystal lattice cells, closed-loop phase-change gas system, geoexchange heat pump, self-recharging capacitive discharge thermal generator, ceramic electrodynamic wafer, solid-oxide fuel cell, splitter of water molecules, motionless electromagnetic generator, Richardson fuel-less electrical generator, Hawkings' generator of cold electricity, radiant energy pump/electricity

generator, controlled electron capture reaction, Hendershot magnetic motor, N-1 homopolar generator, atomic isotope generator, closed-path homopolar generator, switched energy resonant power system, high-voltage injection of rain water into cold fog, magnetic propulsion engine, Nova phase change engine, LUMELOID™ light-polarizing photovoltaic film, LEPCON™ femto diode photovoltaic glass sheet, Spiteri water pump, magnetic drive generator, OASIS electric power unit, maximum velocity wind turbine, laser-induced fusion in ultra-dense deuterium, Bedini SG charger, Nova-Neal compression engine, cold fusion thermionic generator, portable electromagnetic generator, and reactionless synchronous generator.Miscellaneous – super-conductive manganite substrates, amplified ionization filtration technologies, Sola-Q self-focusing omni-directional solar cooker, Aaftaab furnace, domestic lens, hydrosonic pump, IPMS-Chernovitsky super ceramics, IPMS micro-channels and filters, IPMS-Kiev and Arzamas-16 super magnets, capacitive step-down transformer, super steam technology, and new propulsion devices for space including electrino fusion power reactor, gravito magnetic device, space drive engine, Moe-Joe orgone energy cell, Walden inertial propulsion, magnetic vortex drive engine, double magnetic fields plasma reactor, magneto-gravitational converter (Searl effect generator), microwave engine, electron spiral toroid Spheromak micro-fusion reactor, internal rotating plasma rings, nuclear electric rocket, David Burns' anti-gravity spacecraft, inertia-less craft and anti-gravity, atomic powered plasma rocket engine, tubular shaped interstellar space craft, gravity control, and meta-stable helium. Advanced Self-Powered Electric Transportation Vehicles – switched reluctance motor, fuel saver that nearly doubles miles per gallon of gasoline, Stanley A. Meyer's water fuel cell-powered car, water-fueled internal combustion engine with Garrett electrolytic carburetor, Brown's gas carburetor, water-to-energy electrolysis process, Richardson blade-less Tesla-type steam turbine, water engine, noble gas plasma engine, Clem over-unity vegetable oil engine, motive power generating device, multi-chambered rotary compression engine, closed-cycle Freon/rotary turbine, 90+ mpg carburetor, conical vortex heat exchange engine, four environmental heat engines, liquid electricity engine. Volcheck: engine powered by gas with unusual expansion properties, Muller motor/generator, conversion of aluminum internal combustion engine to magnetic motor, perm-mag motor, Walden amplified magnetic motor, other over-unity magnetic motors, orgone energy motor, torsion field radio, advanced computer-controlled suspension systems, monocoque (unibody) basalt/carbon fiber foam body/frame made with IPMS high-temperature gas plasma detonator, low-temperature diamond or titanium nitride coating of vehicle parts, Cool Chips thermo-ionic refrigerator, IPMS thermal electric cooling devices, Sky Train, compressed air-driven air conditioner/heater, salt water flow cell, Sirius ultra-capacitor battery, melanin battery/generator, electrostatic motor, Manelas battery charger, high rotor pole switched reluctance motor, axial-flux electric motor, and one of possibly more than a dozen candidate on-board fuel-less battery chargers.Batteries/Energy Accumulators – diamond nuclear voltaic battery, QUENSOR™, Casimer effect self-charging energy cell, Bedini battery charger, catalyst induced hydrino transition cell, Maxwell Technologies ultra-capacitor, IPMS crystal lattice energy storage/battery device, nickel-iron battery, Baldwin's super-capacitor, nickel metal hydride batteries, solid-state lithium-ion batteries, liquid metal battery, John Hutchison's self-charged battery, endless electric field generator, Brown nuclear battery, Moe-Joe orgone energy cell, Yasunori Takahashi's ultra-capacitor, thin-film electrolytic cells, organic quinine-based redox flow battery, Fisker flexible solid-state battery, graphene polymer battery, graphene magnesium battery, thermal energy battery, solid-state lithium-metal battery, and torsion field energy storage applications.Radioactive Waste Treatment Methods – refresher-regenerator, Purdue University patent, Hawkings' generator makes yard-long white spark of cold electricity several inches in diameter - substances inserted in spark sometimes transmute to heavier elements, Gillembardo's method, collective ion accelerator treats both solid and liquid nuclear waste, Radha Roy's transmutation process, dematerialization devices A, B, C and D using highest powered positive ions ever, Russian process uses liquid lead bismuth to trigger transforming in the form of neutrons, Barker invented easiest, most effective, and least messy method for remediation of radioactive waste, implosion machine is electric arc welder modified to duplicate nature's ball lightning, photo-deactivation using gamma rays, transmutation of low-level nuclear waste into glassy substance with super high voltage, 96% reduction of radioactivity by welding with Brown's gas – further reduction is possible by utilizing liquefied Brown's gas, combining Brown's gas with bucking magnetic fields inside a plasma ball, Thomas Bearden's electromagnetic conditioning method, accelerator-driven transmutation of waste, Brown's gas-metal matrix process, photoremediation, ZIPP fusion process, RIPPLE fission process, low-energy nuclear transmutation electrolytic cells, plasma induced/injected transmutation, Kervran reactions, recovery of uranium from incinerated low-level radioactive waste using super-critical CO2, AmoTerra process, geomelting can encase nuclear waste in glass that is harder than concrete and lasts

200,000 years, higher group symmetry electrodynamics, plasma gasification melting, e.coli – Birmingham University, flame-free incineration in a catalyzer, John Hutchison's raygun, fusion-fission hybrid reactor, 'oranur effect' method, graphene oxide, thorium reactor, bacteria neutralizes liquid nuclear waste, and low-energy nuclear remediation with ultra-low momentum neutron generator.Gary Vesperman, 1303 Darlene Way 202A, Boulder City, Nevada 89005-3337 702-435-7947 garyvesperman@yahoo.com padrak.com/vesperman commutefaster.com/vesperman.html"Gallery of Clean Energy Inventions" pdf file is at https://app.box.com/v/CLEANENERGYEXHIBIT. -------Attachment (Clean Energy Inventions list.docx) END-------

Letter #: 5952

Date Received: 3/1/2026

Sender Names: 5926: Cyndi Viola

Emails: 5926: caviola@yahoo.com

Organizations:

Subject: Comments on water rights

DOI - . Hello there,I am a resident of Henderson, NV and have been since 2011. I am born and raised from Southern California and visit often.I absolutely love Nevada but my family and I have been discussing relocating for a few years because of the water issue and lake mead continuing to drop. We never find anywhere better to be, however.I've become much more aware of what the water issues actually are and it's really hard to decide what's true and what's not.A lot of people blame all of our new construction and that's just a public misunderstanding. Most of our water, we're told, in Las Vegas, gets recycled. We have limited pool sizes, new builds have skipped master bath tubs, we have pulled up real lawns and trees. Our parks have lost trees and grass. WE are doing our part. Ironically we're pulling up trees and grass which COOLS and in exchange doesn't need as much water. A drive through the very lush Spanish trails country club boasts a 20 degree temperature drop. Yet there's companies providing free trees to lower the urban heat index, and now lawsuits about pulling up the park trees. What is it?I can tell you my fake grass runs hotter than real. Nonetheless, I feel that Nevada is the dam quite literally, we have to hold on to what we have. As they say, we only use less than 5% of our allocated water and then of that water we recycle almost all of it. It's just the outdoor water use that's wasted.California sees this as an asset they would like to have. California sees allocated water that we have and they want. If we give them that, I fear lake mead will drastically fall much sooner much faster. Why should we give it to them? As I said, WE are doing everything we can. But a visit to California is not the same. I specifically am from Palm Springs, CA. The mass water falls, the golf courses- they're all still lush and green. My best friend has a real lawn front AND back. They are under no water restrictions. They are doing nothing to use less. They are not pulling up trees and grass. Why do we give more, when they aren't even trying to reduce their use now?The Salton Sea and how that happened, that blood is also directly on California's hands and it was from the same water system, they've shown they don't care.Arizona also boasts that they haven't increased use of water since the 70s which is... interesting with the mass development and they obtain water from 3 rivers. If they haven't increased use, then why do they need more? Why did a moratorium on additional water use get placed in Phoenix?We do have the water to use, that we aren't using, yes. However, until these other places do absolutely everything they can before receiving, they don't need it.In Las Vegas everyone blames the new builds however I've learned that Deadpool is around 890 feet. At that point, no more water comes down, WE have water here because our allocations come prior to the dam so in reality we will be fine, the other states won't.If they need more, they need to take it more seriously. Grass has to go and trees, if the honest truth is that it helps.

What you also need and I've said this for years...to get some attention on it because most people have no clue...Put up some billboards.On the 15, but also in California. Let it be digital so the amounts can change for anyone who may frequently monitor. Put a billboard up that says... 200 feet to Deadpool. Let people google it.We need to put pressure on the other states to do better. If they want more, they need to do more. Cyndi Viola

Letter #: 1318

Date Received: 2/18/2026

Sender Names: 1307: Nick Vomund

Emails: 1307: nivo2247@gmail.com

Organizations:

Subject: Lake Powell - Fill It

DOI - . I am not a typical boater, but I am a lifelong resident of Southwest USA, and recreational water user, as well as a big fan of drinking water. In my opinion, Lake Powell should be managed to maximize water storage while releasing just enough to avoid emergency releases during big water years. Having a dam that is chronically below 50% capacity is a massive waste of the enormous investment put into this project. It also causes more uncertainty for downstream water users in drought years. Center pivot irrigation should have provided a 30-50% efficiency gain for most desert farmers since water rights were distributed. Take that into consideration.Fill the dam, lower the outflows to match. It's not going to happen naturally, and we need that water storage for emergency drought conditions now more than ever.

From,Nick VomundTruckee, CA

Letter #: 7631

Date Received: 3/1/2026

Sender Names: 7581: W C

Emails: 7581: wcconsulting11@gmail.com

Organizations:

Subject: How Arizona could save water for Human and Wild Life consumption

DOI - . Eliminating semiconductor manufacturing and AI data centers in Arizona would save significant water, though exact figures depend on operational scale and recycling practices. ### Water Savings Estimate: - **Semiconductor fabs** (e.g., TSMC, Intel): - TSMC's Phoenix plant is projected to use **up to 17 million gallons per day** (6.2 billion gallons/year). - Intel's Chandler fabs use **~9.1 million gallons daily**, but recycle over 80%, reducing net freshwater use. - **AI Data Centers**: - ~60 data centers in Phoenix use **~177 million gallons per day** (64.6 billion gallons/year) when including indirect cooling from power generation. - Direct on-site cooling accounts for **~385 million gallons/year**, while **~2.9 billion gallons/year** are used indirectly by power plants. ### Total Potential Annual Savings: - **Direct water use**: ~600 million-1 billion gallons/year. - **Indirect (power-related) use**: ~2.9-3 billion gallons/year. - **Combined**: Up to **~4 billion gallons/year** could be saved if all such facilities were eliminated. This would free up enough water to supply tens of thousands of households or support agriculture and ecosystems in a drought-stressed state. -- Best Regards, WC WCConsulting11@gmail.com

Letter #: 7519

Date Received: 3/2/2026

Sender Names: 7471: Dan Waldvogle

Emails: 7471: dan@cbay.org

Organizations:

Subject: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Comments

DOI - . Hello, please see the attached document containing comments from the Protect CO Ag Water Coalition regarding the Draft EIS Public Review and Comment Process. As a coalition representing water users that account for the majority of consumptive use in Colorado, we are happy to answer any questions or engage further. -Dan Waldvogle -- Dan Waldvogle Conscience Bay Research, Program Officer Western States Ranches, Director of Research (970) 389-2041 dan@cbay.org -------Attachment (EIS Protect CO Ag Water Coalition Comments.pdf) START------- Re: Comments on the Draft Environmental Impact Statement for Post-2026 Colorado River Operations Submitted to: U.S. Bureau of Reclamation, Department of Interior Attn: Post-2026 Colorado River River Reservoir Operations (EIS No. 20250184) CRBpost2026@usbr.gov BCOO-1000 P.O. Box 61470 Boulder City, NV 89006 Submitted by: Protect CO Ag Water Coalition * Colorado Cattlemen's Association * Colorado Farm Bureau * Rocky Mountain Farmers Union Date: March 2, 2026 I. Introduction The Protect CO Ag Water Coalition, comprised of Colorado Cattlemen's Association, Colorado Farm Bureau, and Rocky Mountain Farmers Union, respectfully submits the following comments on the Draft Environmental Impact Statement (Draft EIS) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead , as noticed in the Federal Register at Fed. Reg. No. (2026). Agriculture is the second-largest industry in Colorado and is foundational to the economic stability, cultural heritage, and food production systems of rural communities--particularly on Colorado's West Slope. Water is the essential input that sustains this productivity. As hydrologic conditions grow increasingly arid and demand pressures intensify; durable, practicable, and economically sound river operations are critical. The decisions made in this process will directly influence compact compliance exposure, agricultural water reliability, and the long-term viability of rural communities throughout Colorado. To that end, we believe that, because of our hydrologic realities and limited storage capacity, the most effective way that the Upper Basin can contribute to stabilizing and managing the Colorado River system, and being part of a seven-state solution, is to include the Upper Division States' proposal of a voluntary conservation pool in the Final EIS. II. Support for a Voluntary Conservation Pool -- With Safeguards We support creative and voluntary mechanisms to conserve water in ways that maintain the economic productivity of Colorado's agricultural industry. Any additional activities above Lake Powell designed to deploy conserved consumptive use practices that contribute to a conservation pool must: * Protect private property rights and the Prior Appropriation Doctrine; and * Promote voluntary, temporary contributions from individual water users with adequate compensation rather than uncompensated curtailment; and * Allow individual states to maintain their sovereignty to administer programs that: * Are informed by agricultural producers; and * Deploy no injury principles; and * Consider negative community economic impacts; and * Protect participants from abandonment or changes to historic consumptive use determinations; and * Allow for additional protections including: # Distributed geographic participation, # Amount of eligibility for any particular water right, # Appropriate payment structures that incentivize participation and discourage speculation, # Program integrity to guarantee that water is conserved, measured, and verified; and * Provide autonomy for the Upper Basin to control releases from the conservation pool while ensuring that it is operationally neutral; and * Ensure that that contributions to a dedicated conservation account of conserved water are stored in Upper Basin reservoirs; and * Be designed to satisfy non-depletion obligations for Colorado as part of the Upper Division States. There is clear consensus throughout the Upper Division States to include a voluntary conservation pool as a component to a Post-2026 Operating Guideline framework. These additional activities above Lake Powell were first offered as part of the Upper Division States Alternative Refinements on December 30, and this concept has continued to be offered throughout the negotiating process. III. Final EIS Analysis Recommendations We respectfully request that the Final EIS: * Provide detailed modeling of Upper Basin agricultural curtailment risk; * Quantify economic and social impacts to rural agricultural communities including the relation to our addition to the recreation industry and the multitude of ecosystem services that the headwaters of the CO River provides; * Evaluate

voluntary, temporary, compensated conservation as a viable operational strategy; * Support federal investment in clear, verifiable means that provide integrity for compact accounting of conserved consumptive conservation; and * Model methods for estimating, measuring, and verifying conserved consumptive use and processes for shepherding conserved water that account for transit loss and evaporation. The Final EIS should clearly explain how agricultural water rights reliability is affected and how voluntary conservation programs could reduce the risk of mandatory curtailment. IV. Conclusion Colorado's farmers and ranchers are prepared to support an Upper Basin conservation pool where we engage in proactive conservation efforts that protect compact compliance while sustaining agricultural viability. However, any conserved consumptive use program must be voluntary, temporary, compensated, federally funded, protective of water rights, and administered with strong in-state control. A thoughtfully structured conservation framework is preferable to reactive litigation, uncompensated curtailment, or permanent "buy and dry" outcomes that hollow out rural economies. We urge the Bureau to incorporate these principles and funding mechanisms into the Final EIS and any subsequent Record of Decision. Respectfully submitted, Protect CO Ag Water Coalition Taylor Szilagyi, Colorado Farm Bureau Executive Vice President Tyler Garret, Rocky Mountain Farmers Union Chief Executive Officer Erin Karney Spaur, Colorado Cattlemen's Executive Vice President -------Attachment (EIS Protect CO Ag Water Coalition Comments.pdf) END-------

Letter #: 5749

Date Received: 2/28/2026

Sender Names: 5712: Craig Wallentine

Emails: 5712: mountainstate10@gmail.com

Organizations:

Subject: Fwd: Post-2026 Operational Guidelines EIS comments

DOI - . Email: crbpost2026@usbr.govBureau of Reclamation Attn: BCOO-1000P.O. Box 61470 Boulder City, NV 89006Telephone: (602) 609-6739To Whom It May Concern:The most important factor for yourproposed EIS for Post-2026 Operational Guidelines is that the century old "Law of the River" needs to be honored. The option that comes closest to making the Upper Basin States honor their required water delivery requirements is the "Maximum Operational Flexibility Option". This option will require the Upper Basin states to make new and mandatory consumptive water usage from today's profligate usage especially in the State of Utah, a major water waster that is managing to destroy the Great Salt Lake while ignoring senior Native American water rights. As carefully documented in"Science be Dammed" by Eric Kuhn and John Fleck,the Lower Basin States - especially California, carefully finalized their water rights over the decades with the approval of the Upper Basin States. These adjudicated rights must not be infringed by the Upper Basin States that agreed to them. This is critical because a state like Utah is the poorest performer in the Colorado River Compact with respect to water conservation with per capita water usage twice what the Lower Basin States have been able to achieve through years of hard work. Utah gives away the bulk of its water to farmers and ranchers for the minimal cost of distribution while the State Legislature has actively fought to keep urban water prices absurdly low thus encouraging domestic waste. Utah also stands out as the most hypocritical in the Upper Basin in that it has never delivered on its decades old promises to deliver senior Native American tribes and insists on using "First in Time, First in Right" for its own water while expecting the Lower Basin States to give up their adjudicated "First in Time, First in Right" water rights. The Upper Basin should be contributing hundreds of thousands of newly conserved acre-feet to the River as part of this Flexibility Option. To date, the Utahns have failed to document any material savings from their "Agricultural Water Optimization" programs which have handed taxpayer money to agricultural special interests with essentially no saved water being quantitatively delivered to the Great Salt Lake. The Utahns continue to propose old-fashioned, big-dollar concrete and steel projects like the Lake Powell Pipeline and Bear River Diversion at a time when their fossil fuel energy economy is accelerating the aridification of the West. The Maximum Operational Flexibility Alternative provides greater system stability, avoiding unplanned deadpool-related reductions in 91% of modeled scenarios. In addition, the alternative maintains power pool elevations in 95% of scenarios in Lake Powell and 87% of scenarios in Lake Mead while respecting the senior water rights of the Lower Basin States while requiring that the Upper Basin States (especially Utah) finally achieves the level of agricultural and urban water use efficiency that the Lower Basin States have demonstrated for years. Thank you, Craig WallentineSalt Lake City, Utah

Letter #: 7696

Date Received: 3/2/2026

Sender Names: 7642: Laura Walton

Emails: 7642: lwalton7@gmail.com

Organizations:

Subject: Public Comment - Colorado River

DOI - . Requiring Upper Basin States to share in shortagesUsing upstream reservoirs to prop up water levels in Lake PowellRelaxing the Upper Basin's obligation to deliver the Compact's requirement of water to the Lower Basin Pro-rata sharing of Lower Basin shortages (i.e., cutting the CAP delivery only by as much as other users are cut.)Basing deliveries on proportions of average of flows at Lees Ferry, rather than fixed amounts specified in the Compact.Restrict the growing of alfalfa in a meaningful way, i.e. no summer crops, limited export of crops -- Laura Walton

Letter #: 291

Date Received: 2/17/2026

Sender Names: 289: Lindsey Warburton

Emails: 289: 1stcallsvc@gmail.com

Organizations:

Subject: Colorado river

DOI - .Quit building houses in Las Vegas, Henderson, North Las Vegas. It's not sustainableSent from my iPhone

Letter #: 4447

Date Received: 2/28/2026

Sender Names: 4414: Ryan Waterhouse

Emails: 4414: rwaterhouse83@yahoo.com

Organizations:

Subject: Glen

DOI - . Please figure out a way to safely remove the Glen Canyon dam and begin to restore this section of the Colorado River!Sent from Yahoo Mail for iPhone

Letter #: 3707

Date Received: 2/27/2026

Sender Names: 3670: Danny Watson

Emails: 3670: dwtsn4@gmail.com

Organizations:

Subject: Colorado River

DOI - . Please use the Bureau of Reclamation's preferred alternative.

Letter #: 8633

Date Received: 3/2/2026

Sender Names: 8555: Sarah Watts

Emails: 8555: sarah@gilbertchamber.com

Organizations:

Subject: Request for Comment on Draft Environmental Impact Statement on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – 91 FR 2131

DOI - . March 2, 2026 United States Bureau of Reclamation Attn: BCOO-1000 P.O. Box 61470 Boulder City, Nevada 89006 I am writing to voice my profound concerns regarding the Draft Environmental Impact Statement (DEIS) for the Post 2026 Operational Guidelines for Lake Powell and Lake Mead, and the detrimental impacts the proposed alternatives would have on my community. The Colorado River is critical to sustaining the Town of Gilbert and all of Central and Southern Arizona. Colorado River water, delivered through the Central Arizona Project (CAP), is the lifeline that supports our homes, schools, parks, and businesses. Gilbert is the third-largest municipality in the Greater Phoenix area and continues to be one of the fastest-growing communities in Arizona, with a population exceeding 290,000. Gilbert's thriving economy is anchored by significant employers in industries including healthcare and life sciences, clean technology, aerospace and defense, advanced business services, information and communications technology, optics, and education. Reliable water supplies are not optional for these sectors; they are foundational. CAP reductions of the magnitude contemplated in the DEIS would jeopardize business operations, threaten jobs, and undermine billions of dollars in public and private investment across our region. The DEIS does not adequately analyze the full socioeconomic impacts on Arizona and the Nation. Over the past several years, Gilbert has made extraordinary financial commitments to ensure water resilience. The Town has invested and committed more than $800 million in infrastructure, including new wells, treatment upgrades, expanded recharge, and advanced metering technology. These efforts have been supported by substantial rate increases for residents and businesses from 2024 through 2026. Our community has stretched to do its part. The DEIS fails to acknowledge these efforts or evaluate the additional, untenable burdens the proposed alternatives would impose. Any post-2026 framework must equitably account for reductions already borne by Arizona water users. Our community relies heavily on Colorado River water to meet existing municipal, industrial, and economic needs. Historically, Colorado River water delivered through CAP has represented roughly half of Gilbert's annual water portfolio. The DEIS threatens to cut off Gilbert from this critical water supply while shifting a disproportionate share of the shortage reductions onto Arizona water users. These arbitrary and dangerous cuts to Arizona are unacceptable. In addition, the DEIS alternatives depart from the framework established under the Colorado River Compact, the Boulder Canyon Project Act, and subsequent agreements that allocate water among the Basin states. The DEIS does not provide the "hard look" at environmental consequences required by law and threatens to impose unconscionable devastation on the State of Arizona and its people. We urge Reclamation to withdraw this defective DEIS and reissue a document that complies with the law. Thank you for your attention to this critical matter. Sincerely,

Letter #: 8907

Date Received: 3/3/2026

Sender Names: 8813: Tammy Weaver

Emails: 8813: Tammy.Weaver@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, Hey, fellow desert dweller--your rage is 100% valid, but let's crank up the sarcasm and shrink this rant into a mic-drop version:I moved to Arizona 20+ years ago for that sweet, clean water. Now? We're handing our CAP canal lifeline to semiconductor plants and AI data centers like it's happy hour free refills.TSMC's Phoenix fab? Starts at ~4.75 million gallons a day (enough for thousands of homes), scaling to 17+ million across fabs--while they promise to recycle most of it... eventually. Meanwhile, data centers from Microsoft, Meta, and friends are guzzling millions more for cooling servers that train models to tell us we're all doomed.We're told to skip showers, yank our lawns, and brush our teeth like we're in a drought survival game. But the mega-fab up the street gets a VIP water pass because... chips > people?Colorado River's on life support, no Basin deal in sight (Upper vs. Lower states still bickering like it's family Thanksgiving), and corporate thirst keeps growing. PFAS? Who needs testing when profits are flowing?Bottom line: Prioritizing Big Tech's hydration over ours is like serving steak to the neighbors while your kids eat dust. We deserve safe water, not recycled corporate wastewater and excuses.Halt the unchecked expansion, enforce real conservation across the board, or watch the exodus begin. Last one out can sip polluted H2O with their microchips. I'm not sticking around to drink TSMC and Amkors polluted water complied with my neighbor recycled toilet water. Shame on the greedy lobbyist and politicians that put us in this mess. It's literally impacting people happiness when they have to worry so much about water availability. I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Tammy Weaver 27116 N 53rd Avenue Phoenix, AZ

Letter #: 3532

Date Received: 2/26/2026

Sender Names: 3499: barbara weber

Emails: 3499: barbara7588@yahoo.com

Organizations:

Subject:

DOI - . Yahoo Mail: Search, Organize, Conquer

Letter #: 3862

Date Received: 2/26/2026

Sender Names: 3499: barbara weber

Emails: 3499: barbara7588@yahoo.com

Organizations:

Subject:

DOI - . Colorado River Save it ! ! !Yahoo Mail: Search, Organize, Conquer

Letter #: 1780

Date Received: 2/23/2026

Sender Names: 1769: Sarah Weber

Emails: 1769: sarahlweber@gmail.com

Organizations:

Subject: Draft EIS Comment

DOI - . Dear Commissioner and Bureau of Reclamation Staff,I am writing to express strong support for theMaximum Operational Flexibility Alternative in the Draft Environmental Impact Statement for Post-2026 Colorado River operations.As you know, the Colorado River system is facing long-term aridification and deep uncertainty. In this context, an alternative that provides the greatest capacity for adaptive management and system-wide responsiveness is essential. The Maximum Operational Flexibility framework offers the most robust toolkit to respond dynamically to hydrologic variability, protect critical reservoir levels, and encourage early and meaningful conservation actions across the Basin.Importantly, a durable post-2026 framework must ensure that responsibility for stabilizing the system is shared equitably among all Basin states and all categories of water users. It is not sustainable for any one region to shoulder a disproportionate share of reductions while the entire Basin benefits from system reliability. The Maximum Operational Flexibility framework provides the strongest pathway to distribute risk and conservation obligations across the system.That said, the Enhanced Coordination Alternative would also represent a meaningful step toward more integrated reservoir management and shared system protection. If structured to ensure equitable participation in conservation across both the Upper and Lower Basins, it could provide an acceptable path forward.Thank you for your careful consideration of these critical decisions for the future of the Colorado River Basin.Sincerely,Sarah WeberTucson, Arizona

Letter #: 8791

Date Received: 3/3/2026

Sender Names: 8704: Guy Webster

Emails: 8704: utahpumaguy@hotmail.com

Organizations:

Subject: Importance of Lake Powell

DOI - . As a 35 year resident of Green River, Utah and someone who has spent every summer at Lake Powell for over three decades I would like to see any decisions for the future of Lake Powell to be favorable for continuation of the lake. I worked for the Highway Patrol a just recently retired as the Sgt who oversaw the highways from Interstate 70 to Bullfrog and Hite. During the years, I have seen personally the impact on communities with their financial needs of Lake Powell. The town of Hanksville will struggle to even remain a spot on the map if Lake Powell was to be abandoned. Green River would see a significant financial impact as well. As a city council member of Green River, I see first hand the budget of town and the needs of recreation such as Lake Powell with Bullfrog as the destination. The recreation of the area would be greatly compromised with a lack of the lake. I see first hand the amount of people who use Lake Powell as compared to the small fraction of people who utilize the areas of the Green River above Lake Powell. I know personally, I would not have seen any of the attractions of Lake Powell without being able to utilize a powerboat to travel to the destinations on the lake. I would never seen Rainbow Bridge, Cathedral in the Desert, LaGorce Arch, Defiance House Ruins...as most people would be the same and not have those cherished memories. It is a struggle to maintain the lake and water levels and we can hope for better forecasts in the future, but we need to stay focused on doing the best we can now and be prepared to take advantage of wetter patterns when they do come. Guy Webster Green River, Utah

March 2, 2026

Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006
Via email: crbpost2026@usbr.gov

These comments are in reference to *the Draft Environmental Impact Statement on Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead* (DEIS). I have a 50 year career of experience working on the Colorado River system including: (1) working for the Upper Colorado Regional Office on water quality and hydrology studies on the Green and Colorado rivers; (2) responsible for limnology studies on Lake Powell, Flaming Gorge, and the other CRSP reservoirs in the early 1980's; (3) Program Manager for the Glen Canyon Environmental Studies (1983-1996); (4) Involvement in three National Academy of Sciences reviews of the operational impacts of Glen Canyon Dam on the Grand Canyon resources; and, (5) Senior staff for the U.S. House of Representatives, Natural Resources (Water and Power Subcommittee Staff Director) and the Transportation and Infrastructure committees (Senior Staff) assessing and developing policy and legislation for Reclamation programs and liaison with the Administration and the National Academy of Sciences on western water science. Thank you for the opportunity to comment.

Background and Context

The Colorado River Storage Project Act (P.L. 485) was passed by Congress in 1956. (70 Stat. 105.) The project permitted the construction of several reservoirs and dams, including Glen Canyon Dam to store water and generate hydroelectric power. Comprehensive and coordinated water management in the Colorado River Basin was made possible by CRSP. The act's major features included building multiple Upper Colorado River Basin storage facilities and establishing regulations for water distribution.

Glen Canyon Dam forms the largest reservoir in the Upper Colorado River Basin, Lake Powell. The reservoir has historically provided the Upper Colorado River Basin states with a water bank from which they can more easily manage their portion of the legally required releases of Colorado River to the Lower Colorado River Basin. Since initial reservoir filling in 1980 to 2000, Lake Powell water capacity has had sufficient ability to meet all downstream deliveries to satisfy legal requirements. Revenue generated by the sale of electrical energy and capacity from the CRSP unites, dominated by Glen Canyon Dam production, have provided revenue to the **Upper Basin Fund** to pay for the operational, maintenance support and environmental programs throughout the Upper Basin.

Role of the National Environmental Policy Act

The National Environmental Policy Act (NEPA) of 1969 is the U.S. law that requires federal agencies to consider the environmental impacts of their proposed actions and decisions. This act serves as the cornerstone of U.S. environmental policy, promoting informed decision-making and requires public participation in projects that could significantly affect the environment.

The core objectives of NEPA are summarized as follows:

- **Environmental Impact Assessment:** Requires federal agencies to prepare detailed environmental impact statements (EISs) for major federal actions significantly affecting the quality of the human environment.
- **Informed Decision-Making:** Promotes informed decision-making by requiring agencies to consider a range of alternatives and to publicly disclose the environmental effects of proposed actions.
- **Public Involvement:** Encourages public participation in the environmental review process, ensuring that communities have a voice in decisions that may affect them.
- **Mitigation of Environmental Harms:** Seeks to minimize or avoid adverse environmental impacts through mitigation measures incorporated into project designs and implementation.

NEPA doesn't dictate environmental outcomes; rather, it mandates a *process* designed to improve the quality of federal decision-making. It forces agencies to assess before they act, consider alternative options, and explain their decisions in a transparent manner. Reclamation has consistently stated that the *Post 2026 Operational Guidelines EIS* is an "*operational EIS*" and therefore they (BOR) would not consider infrastructure modifications. This same logic was utilized in the development of the initial NEPA process at Glen Canyon Dam, "*Operation of Glen Canyon Dam, FEIS*" (1995). That EIS and Record of Decision, however recognized that the impact of the dam itself was a causative factor of the downstream impacts in the Grand Canyon.

The current narrow interpretation of the Post 2026 effort however comes at a much different time and set of circumstances. During the period of 1980 – 2000 the Upper Basin States and Reclamation were managing an essential full reservoir system, and operations could be adjusted to address impacts through operations. The current hydrologic system (2000 – 2026) is far different than earlier. Now we are facing challenges where the infrastructure itself is potentially limiting the operational options for Reclamation and the Upper Basin states.

Utilizing the past reasoning of the original Operational EIS at Glen Canyon Dam is both administratively expedient and easy, it does not take into consideration the fact that the reason the operations are being considered for Glen Canyon Dam is the fact that it is a federal government infrastructure that provides operational capacity. Infrastructure that was designed and constructed under a separate set of hydrological assumptions and operational considerations. Therefore I suggest that the infrastructure of the dam,

including constraints on the downstream releases to meet 1922 Compact requirements and releases for hydropower are in fact constrained by operational infrastructure limitations (elevation, turbine design limits, and river outlet tube limits) and therefore, it is suggested that infrastructure should be an integral part of the *Post 2026 Operational Guidelines* review.

Can the NEPA Process be Changed?

A draft EIS, final EIS, or supplemental EIS may be supplemented at any time (authors underline). An EIS must be supplemented whenever the Administration determines:

(1) Changes to the proposed action would result in significant environmental impacts not evaluated in the EIS; or

(2) New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.

However, a supplemental EIS will not be necessary where:

(1) The changes to the proposed action, new information, or new circumstances result in a lessening of adverse environmental impacts evaluated in the EIS without causing other reasonably foreseeable environmental impacts that are significant and were not evaluated in the EIS; or

(2) The Administration decides to approve an alternative fully evaluated in an approved final EIS but not identified as the preferred alternative. In such a case, a revised ROD must be prepared and circulated in accordance with § 771.127(b).

It is the suggestion by the author that sufficient new information has been developed since initial publication of the Federal Register Notice (2023-23127 – 88 FR 72535) [October 20, 2023] that set this process in motion that would warrant a change in the stated objective of an operation only focus of the DEIS.

Specific Comments

1. **Hydrology Used in the Analysis. Historic versus current hydrology**

Since 2000 the Colorado River Basin has experienced a significant shift in the runoff to the Green, Colorado, and tributary input rivers. The result was less than historical averages in snowpack and resulting runoff. Increasing elevation of the snow lines in the mountains, increased spring and fall temperatures, drying of the soil, dust on snow events, and other localized conditions have all resulted in less drops of water into the collection system.

The five hydrological categories used to evaluate the alternatives in the DEIS are based on historical 21st Century flow patterns. The DEIS concludes that a 3-year average period for Colorado River flows is "long enough to show impacts from multiple years of moderately challenging hydrology ".

If there is one thing we have learned from the actual Colorado River runoff levels is that the basin has experienced significant hydrologic change, even before the most recent 20 years of increased variability due to reduced snowpack and changed snowpack and snow melt conditions. Climate scientists still employed by the Federal government and academic experts are unanimous in their predictions that this trend in reduced runoff and increased variability will continue to increase. In addition to the variability between years, it is concluded that we are now experiencing a longer-term trend of aridification across the Western United States which may further exacerbate the potential variability.

Therefore, it is suggested that the DEIS should focus on using the Dry and Critically Dry categories as their baseline conditions.

2. Short term versus long term (20 Yrs). Small steps to move forward.

The hydrologic challenges currently facing the Colorado River Basin and the lack of Basin states agreement on a long term path forward all point to the need to immediately implement a short term operational agreement with the caveat that several additional actions will be taken to facilitate assessing a longer term set of guidelines while the lawyers and others outline their arguments regarding future options. The cause of this short-term action is the result of many factors but the reality is that we need to step back, take a breath, gather more information, and identify solution pathways. While the current process has moved the dialogue it is not the one that will get the process completed.

It is suggested:

- Hire a facilitation group that will lead the discussions and subsequent proposed development of actions. This should utilize a team who can work across the spectrum of issues and who can do the legwork and direct coordination to keep the states at the negotiating table. The facilitator should be able to engage also with the tribes and with the relevant stakeholder groups to ensure their input is solicited.
- Engage immediately with the National Academy of Sciences or suitable independent science group who will perform an analysis of the existing climate/hydrology predictions to establish a refined and supported assessment of potential short term (5-10 year) and longer term (10-30 year) climate and hydrological futures.
- Provide monthly updates to the federal government including Congress as to the status of the process and where specific actions may be required.
- Engage with the Congressional Colorado River Caucus to ensure Congress is directly involved in the process to ensure that they are concurrently working on any authorizations or appropriations that may be required to implement actions while

ensuring that budget support for the affected agencies is identified through specific appropriations legislation.

3. Upper Basin Water Banks and Financial Incentives to Engage.

Since initial filling of Lake Powell in 1980, the seven basin states have developed a set of protocols and policies to ensure the requirements of the Colorado River Compact and the remainder of the Law of River has been met. Management of the Colorado River from 1965 to 2000 allowed for rapid growth to occur in the Colorado River basin. Increased diversions to agriculture, cities, and industries have resulted in a structural deficit in terms of available water supply and demand in the Lower Colorado River basin. The Upper Basin has also been impacted via trans basin diversions and growth in key agricultural and municipal areas.

This period has witnessed a diminishment of snowpack runoff that required additional measures have been required to manage the movement, storage, and delivery of water. The 2007 Interim Guidelines (*2007 Interim Guidelines for the Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead*) resulted when a series of low runoff years first threatened the Colorado River Basin. While several Miracle Marches and Mays helped to temporarily enhance runoff, the trend was consistently to lower actual runoff to the system. As a result, additional administrative and on the ground actions were taken in attempts to augment water in the system and to protect critical hydropower infrastructure and legal water delivery requirements. Examples of federal, state, tribal and municipal efforts include financing for drought reduction, Intentionally Created Surplus, investments in efficiency and conservation, and many other innovative efforts. Many of these efforts are options for consideration in any long-term agreement. One of the problems with these innovative ideas, however, is that they were not institutionalized as permanent actions.

Assuming Lake Powell water levels continue to diminish, additional efforts could be designed that would provide for reduced less of evaporated water, seepage transport, and evapotranspiration. A potential action could include:

- Administratively and congressionally create a "Pilot Project" for the Upper Basin to create an "*Upper Basin Water Supply Bank*" in Lake Mead. Created by moving water from Lake Powell to Lake Mead. This pilot project would run for 3-5 years with specific metrics identified to evaluate and report on to Congress and the Basin States. This immediate action would reduce evaporation from Lake Powell and increase the water level in Lake Mead.
- Account for that water utilizing existing and new remote sensing technologies including the creation of a transparent portal that allows each upper basin state and stakeholders to "view" their storage in Lake Mead. NASA and the Western Water Application Office could be tasked into using advanced technologies to document water supply levels.

- The DOE could then market and track the additional hydropower created and marketed by the Upper Basin water and credit that revenue back to the Upper Basin Fund.
- During the Pilot Study period the DOI/BOR could do the necessary feasibility and authorization studies on potential infrastructure modifications at Glen Canyon Dam to increase operational flexibility and reduce Compact requirement risks. This should include assessing the potential to put low-head hydroelectric units in any modified River Outlet tubes or bypass tunnels. The engineering community should be tasked to assist the federal government engineers in looking at the options and capacities.
- All litigation would be postponed during the Pilot Project phase.
- Scientific studies should be supported to refine the measurement of evaporation, evapotranspiration, and seepage loss in specific reaches of the Colorado River systems. These studies should be supported by the Federal government to refine the estimated losses.
- Evaluate current structural deficits and develop science-based realistic levels of future water use in each of the seven states.

4. Environmental Quality – Ecosystem Integrity and Investment

The National Environmental Policy Act (NEPA) requires federal agencies to consider the environmental impacts of their proposed actions and decisions. This act serves as the cornerstone of U.S. environmental policy, promoting informed decision-making and public participation in projects that could significantly affect the environment.

The **purpose for the proposed federal action** (Published in the Federal Register on October 10, 2023) is to:

- update and expand management guidelines for Colorado River reservoirs, particularly for Lake Powell and Lake Mead.
- provide Colorado River water users with 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.

Missing from these five bullets is any recognition that the proposed alternatives could impact on the environmental or cultural properties in the subject area. While it may be assumed to be part of the process it should be explicitly stated and recognized. The

current political environment demands that we be explicit in what we do and what expectations we hold.

While recognizing that the BOR wants this to be an "*operational EIS*" it is relevant that mention of the potential impacts on the environmental impacts, including cultural, biological, physical, and social elements may be appropriate.

The federal government and stakeholders, including the power contract holders, the recreation community, tribes, and the public all have invested in addressing the impacts of the development of the Colorado River infrastructure has had on the cultural, physical and ecological integrity of the system. This investment of time, money and legislative support should not be assumed and in fact demands specific identification.

5. The Need for Replumbing Glen Canyon Dam

The reduction of the level of Lake Powell will quite likely in 2026 limit the ability of Reclamation to move water through the 8 generators at Glen Canyon Dam to meet the water delivery requirement of the Law of the River. The River Outlet Tubes can be used to move some water, but these 4–96-inch steel pipes are limited in the volume of water they can move and were not designed for constant use. They were not designed with the same operational engineering rigor of the generators, and the Bureau technical experts have cautioned that the River Outlet Tubes will be compromised by air and sediment caused cavitation if used outside of their operational constraints. This imposes risk into the future management of the Colorado River system.

The BOR has internally completed appraisal level work on an assessment of the River Outlet Tube issue. That report has not been shared publicly so it is difficult to know the specifics, but it is safe to say they have been thinking about this issue and have provided internal guidance. Therefore, it would seem prudent that a more definitive and structured engineering analysis should be initiated. If Reclamation does not have required staff to complete this analysis, the Administration or Congress could direct the ACOE Engineering Research Development Center at Vicksburg to assist.

6. Assessing the Value of a Basin Supported Water Market

The future of water management of the Colorado River system will recognize the importance of state-defined water rights. Additionally federal reserved water rights will also have to be recognized and supported. Developing a more flexible water supply for the Colorado River system should evaluate and assess the value of creating a river basin water marketing system that will provide, on a short-term basis, the ability of water rights holders to lease their water within a defined market place system to other users within the existing defined service areas for the Colorado River basin.

Currently various types of water markets already exist within individual state borders. The challenge has always been to provide protection and control of leased water once it goes

beyond the borders of individual states. Creating a controlled market place for short term water leases could provide financial incentives to agricultural, municipal, and tribal entities to lease a portion of their water rights and gain a revenue stream to continue to support their individual and basin needs.

The Federal government should support, through the National Academy of Sciences or another independent entity, a charge to review the potential of such a basin water market, review other efforts to establish water markets in states and overseas, and to report back to Congress within a 2 year timeframe with options, concerns, legal requirements, and other ancillary issues. This analysis should include tribes, states, appropriate stakeholders, and a supported and rigorous scientific group of experts.

Based on the review a short-term pilot program could be supported through Congress to be implemented and tested with results brought back to the Congress as to effectiveness and the need for any modification. An independent review Commission should be established to provide the governance during the pilot study.

7. In the Void of Leaderships What is Possible?

Given that after over 3 years of discussion between the states and the federal government that no state-driven preferred alternative has been identified, the issue begs the question as to what leadership for action is needed. Good leadership has been seen within individual states. They have a hard time working with the local and statewide constituents in meeting state goals and objectives. Federal leadership has been more challenging. While the current administration has shown the capacity to hold meetings, the lack of any meaningful action or public discourse is troublesome. Equally troublesome is the lack of any serious leadership emerging from Congress. Good water governance and management policies take commitment and leadership. The Congressional Water Caucus could show promise but the lack of consistency and support does not currently provide hope.

It was inevitable that the Upper and Lower Colorado River Basins would have a challenging time agreeing on the new guidelines, and it became even more likely as drought and dry La Nina conditions settled over the Colorado River Basin over the last couple of years. The Federal government from 2020 to 2024 provided incentives to the states and their stakeholders to reduce the water use and diminish low runoff impact and give the states more room to negotiate. However the limited capacity for federal action did not provide the cover the states administrative limits to come to agreement. A change in leadership in Washington DC set the stage for a "deal" to be made, but little interest from the Administration has emerged and Congress seems to be left out of the discussions.

It is suggested that now leadership in Washington should use the short term of a potential "cooling off period" to implement a different approach built around an unbiased structured discussion of the ideas, alternatives and options with the potential impacts clearly articulated and shared with a broader negotiating constituency. This constituency should include the tribes and representatives from key water supply stakeholders. A clear set of

guidelines, timelines and enforcement protocols should be established and implemented with specific reporting requirements identified.

The Udall Center for Environmental Conflict Resolution (or another of equal capacity) should be hired and tasked with facilitating the discussion and presenting back to Congress and Administration a definitive set of next steps within a 6-month period. The other impacted federal agencies should be brought into the discussion and identify what they can bring to the table to facilitate a federal and state approach to addressing the issue of reduced water supply and demand. For example, NASA and their new water mapping and measurement technologies, DOE with low-head hydropower generators, NOAA and physical climate modeling and River Basin Offices, Agriculture with the SNOTEL sites to measure water in the snowpack. Federal expertise is out there and needs to be brought into discussions.

Summary

Thank you for your hard work in doing the required compliance. One of my first jobs with the Bureau of Reclamation in the early 1970's was to work with the Upper Colorado Region, Environmental Office, in the development of agency policy on implementing NEPA and ESA. Dr. Wayne Deason was our Headquarters liaison. Those were difficult days when the UC Regional Planning and Operations Divisions in the Regional Office were not supportive of change for the new environmental laws.

I have been involved in writing and running NEPA processes for multiple EIS's for land and water use across the West. In 1989 when faced with the direction by Acting Commissioner Joe Hall to implement the first EIS on the operations of Glen Canyon Dam, it was the first evaluation of a major CRSP dam. That process had many starts, stops, tangents of direction and analytical analysis, all while Congress was looking over our shoulder daily. Someday someone should write that story as you are living the artifacts of it today. You are doing a great job with an impossible task. Thank you.

Sincerely,

David L. Wegner
4632 North Paseo Pitiquito
Tucson, AZ 85750
David.l.wegner@gmail.com

Letter #: 3643

Date Received: 2/26/2026

Sender Names: 3606: Robin Weiler

Emails: 3606: robinlweiler@sbcglobal.net

Organizations:

Subject: Protect the Colorado River

DOI - . Please protect the Colorado River!!!Sent from AT&T Yahoo Mail on Android

Letter #: 8692

Date Received: 3/3/2026

Sender Names: 8610: Joseph Weinstein

Emails: 8610: Joseph.Weinstein@messages.fwwatch.org

Organizations:

Subject: Protect Drinking Water – Save the Colorado River Basin

DOI - . Dear Bureau of Reclamation, The Colorado River is in crisis, yet discussions of future management alternatives do not account for HOW THE WATER IS USED. The Bureau must use its authority to push the Basin states to reach a joint agreement that will embody not only REALISTIC OVERALL LIMITS (and therefore corresponding conservation measures) on water QUANTITY, but also prioritizes the HIGHER-NEED HIGHER-VALUE USES of the available water. Present usage patterns are way off-balance. Projected into the near future, they threaten the essential water usage needs of the Basin and its 40 million people. The vast majority of Colorado river basin water is used primarily for growing alfalfa, as feed for cattle on factory farms. Across all seven Basin states, alfalfa farms consumed an estimated 2.1 trillion gallons of water in 2025, enough to supply the Basin's 40 million people with water for nearly 3 and a half years. This and related agricultural uses are not efficient. Basin states use 2.6 acre feet of water/acre - 70% higher than the US average - for crops ill-suited to arid climates. In addition, water-thirsty data centers are now being deployed with little regulation or regard for impacts on water resources. Every environmental analysis and plan for the future must consider how the Colorado River's resources are being used. Overuse of the Colorado River by agribusiness and prospective data centers- amid already record-low water levels and drought - has serious consequences that threaten accessible water for drinking and other everyday essentials for 40 million people. I urge the Bureau of Reclamation to prioritize sustainability and the needs of the 40 million people relying on the Colorado River for drinking water over corporate profit. Sincerely, Joseph Weinstein 4000 Linden Ave Long Beach, CA

Letter #: 338

Date Received: 2/11/2026

Sender Names: 336: John Weisheit

Emails: 336: john@livingrivers.org

Organizations:

Subject: My comments after participating in the virtual meeting of February 10, 2026 that commenced at 5:30 PM and concluded at 7:30 PM (Mountain Time).

DOI - .John WeisheitLiving Rivers & Colorado RiverkeeperPO Box 466Moab, UT. 845342435-260-2590john@livingrivers.orgDate: February 11, 2026Subject: My comments after participating in the virtual meeting of February 10, 2026 that commenced at 5:30 PM and concluded at 7:30 PM (Mountain Time).Dear ReclamationThank you for all the presentations you provided to the public yesterday afternoon, and thank you for your permission to provide my comments to you today. I think what follows could be stated verbally in three minutes.I want to share what may be missing in the DEIS, which I have yet to read in full. So today, I will behave as a generalist.I am of the opinion that if you put the endangered aquatic animals first and the indigenous nations second, the actions published in the Final Record of Decision will be effective. There is a third pillar to consider as well, and that would be providing strategies that guarantee system resiliency and community sustainability.I do think the alternatives as presented should be blended, rather than picking one over the other. However, I do think necessary components are still missing from the alternatives.I also think whatever the states decide, should be given the lowest priority. The states have had over 120 years to make water doctrines and water infrastructure work correctly. The potential of future instability, uncertainty, and societal collapse belongs to them and they must own this problem.What I would like to share is very similar to what former Deputy Secretary Tanya Trujillo said on August 16, 2022 (DOE Press Release):"Every sector in every state has a responsibility to ensure that water is used with maximum efficiency. In order to avoid a catastrophic collapse of the Colorado River System and a future of uncertainty and conflict, water use in the Basin must be reduced," said Assistant Secretary for Water and Science Tanya Trujillo. "The Interior Department is employing prompt and responsive actions and investments to ensure the entire Colorado River Basin can function and support all who rely on it. We are grateful for the hardworking public servants who have dedicated their lives to this work, and who are passionate about the long-term sustainability of Basin states, Tribes, and communities."However, I hope the words "maximum efficiency" does not mean this potential new water source should be directed to the dominant society (municipal, industrial and agricultural practitioners), but rather to the holders of federal reserve water rights. Some might call this alternative the "policy of beauty"--deliberate actions to ensure that precious ecosystems and cultures are respected and improved.I shall now repeat what I have written in public comments since the start of the 21st Century.* The evaporation losses (the "structural deficit") must be counted as a consumptive loss to the allocations of the Lower Basin States and Mexico.* The Upper Basin Depletion Schedule must be ignored. The Upper Basin sectors must get their house in order, especially towards perfecting their definition of beneficial use, and for accurately measuring and monitoring their water use in real and immediate time.* The Hydrologic Determination for the Upper Basin must be revised to reflect the new 30-year average (9.6 million acre-feet). Keeping close in mind that this number will drop to about 8.8 million acre-feet by 2031.* The water market analysis (Rick Gold, 2007) for stored water in Flaming Gorge Reservoir must be revised. Additionally, all water right extension applications since October 6, 2009 should be denied and these water rights should lapse (USBR, Provo Office).* Confining the hydrologic record of the Colorado River Basin between 1906 to 2019 is not a true stochastic approach, especially for the metric called Decision Making Under Deep Uncertainty (DMUD). For the last 2,000 years, there were catastrophic floods and droughts during episodes of global cooling, neutrality and warming. These considerations were mentioned in nationally published papers by the explorers of the Colorado Plateau and the Basin and Range in the 19th century. Additionally, since the spillway designs at Glen Canyon Dam and Hoover Dam were designed in the first half of the 20th century, these specifications demand a modern analysis for a probable snowmelt between 30 and 45 million acre-feet. This would also be true for a decade (if not two) of natural flow at the Compact Point that averages 8 to 10 million acre-feet (or less) , and especially so if groundwater gains to the river bed diminish. In other words, you have permission from the public to demonstrate the worse case scenarios, and preferably on an X & Y axis graphic.Considerations to

groundwater supplies must be addressed, because this has become the surrogate supply in the arid lands. Especially so since federal hydropower, in many locations, incidentally provides electricity to this activity. I find the papers written by Professors Solomon and Famiglietti to be most disconcerting. This water supply nexus deserves your utmost attention and in both the upper and lower divisions.Lastly, I want the US Fish and Wildlife Service to provide biological opinions for the reaches below Flaming Gorge Dam, Blue Mesa Dam, Navajo Dam, and Hoover Dam. I also desire Lake Powell to be designated as critical habitat, because the Colorado River, the Dirty Devil River, the Escalante River, and the San Juan River are now flowing through Glen Canyon National Recreation Area.Thank you for this opportunity to provide public comments for this very important matter.John WeisheitPS - Please acknowledge that these comments were received in good order. Thank you.

Letter #: 3558

Date Received: 2/27/2026

Sender Names: 3525: Thomas Welander

Emails: 3525: slick@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, Please accept my following input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. I request that the Bureau of Reclamation prioritize the following considerations when determining the preferred Alternative for Post-2026 Operations: * Work directly with the seven basin states and Tribes to enact effective water conservation measures that will support a living river for the long-run. * Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support Grand Canyon High Flow Experiments that transport sediment and nutrients. * Infrastructure updates at Glen Canyon Dam must be prioritized in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. * Conservation measures and delivery of water between the Upper and Lower Basins must balance two objectives: 1) maintaining minimum flows at all times in the Grand Canyon with 2) allowing for flow variability across the annual hydrograph to support both the river ecosystem and river recreation opportunities. * Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities, and seek to provide multiple benefits whenever possible. * Mitigate impacts to river recreation opportunities on the Colorado River and the San Juan River due to changing reservoir levels. * Determine how Post-2026 Operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is chosen, not after. * Respect Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. These comments come from a US citizen who has never floated through the Grand Canyon despite having added my name to the now-defunct permit waitlist more than twenty years ago. I am determined to someday have this incredible experience with my family. That is, unless the resource continues to be degraded by greedy and wasteful water consumption allowed by ineffective management. Thank you. Sincerely, Mr. Thomas Welander 591 Grant St SE Atlanta, GA 30312-3148 slick@twrr.org

Section J: Draining Lake Powell and the Fill Mead First Adaptive Management Program

Draining Lake Powell:

Phase 1: Once Lake Powell drops below 3,500 feet, hydropower will be abandoned since it will become incredibly inefficient, and it will be much more cost-effective to stop generating power. The flow of the river through the dam will become temporarily dependent on the two River Outlet Works (ROWs) penstocks that lead to the 4 jet valves that have been used during HFEs. These were retrofitted with new technology following the 2023 HFE that caused cavitation to the tubes, and will have an extra bit of work done on them before they are used. The tubes can run up to 15,000 cfs of water through them while construction starts on the new bypass tunnels.

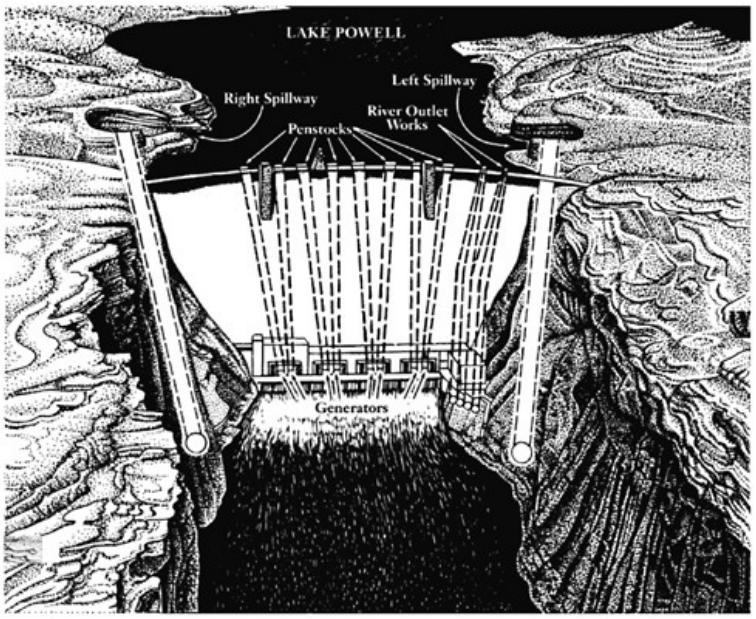


Diagram of Glen Canyon Dam water transportation methods, downstream view

Source: Committee on Grand Canyon Research and Monitoring, 1999

Phase 2: While the ROWs slowly drain Lake Powell from 3,490 feet to 3,370 feet, engineers drill a tunnel that starts from the original diversion tunnels used in the construction of the dam. This new tunnel will be on the south wall of the canyon since the ROW's release valves are on the north side of the canyon, where the water will be flowing. The tunnels will be drilled from

downstream to upstream while going around the concrete plug put in to fill up the reservoir in 1963. The tunnel will be drilled at an elevation of the original riverbed, approximately 3,125 feet, in order to preserve the original gradient of the river. Within the new southern tunnel, a reinforced steel radial gate will be built behind a temporary sandstone rock plug. These will be drilled through the porous and feasibly drillable Navajo Sandstone with the lessons in mind that we have learned from our mistakes with the dam over the past 6 decades. They will be steel-lined, rather than lined with concrete to avoid the problem of cavitation, and the final section of the tunnel will be left as a chunk of rock to allow for a later controlled opening of the tunnel. While this extension of the bypass tunnels is being done, a secondary project will be to lower the intakes of the bypass spillway tunnels that were drilled through the dam in 1983, to stop the reservoir from overflowing, and connected to the diversion tunnels downstream of the concrete plug. Currently, the intakes of the bypass spillway tunnels are at an elevation of 3,648 feet. This secondary project will reroute them to an elevation of 3,200 feet to assist the new southern diversion tunnel in keeping the river flowing as naturally as possible during flooding. They will be built with the same elbow-shaped design and the same ratios of proportions as the original bypass tunnels, with a similar stopping section of sandstone left in place.

Phase 3: A channel will be dug through the sediment behind the dam by a remote submersible, which will clear a 500-foot radius of sediment at the intake of the tunnel. After a controlled internal demolition of the sandstone plug, the water will then be held back by the gate to allow for a controlled and metered release. This will ensure that the 63 years of accumulated sediment are reintroduced to the Grand Canyon in manageable pulses rather than an overwhelming rush. The ROWs will split the load of draining until the river drops below 3,370 feet, the elevation of

the bottom of the ROW penstocks. Once the river is returned to normal levels, it may be possible to rebuild the northern diversion tunnel similarly to keep the Colorado flowing during extreme monsoons.



Glen Canyon Dam in 1963

Source: Arizona Daily Star, 2023

Proposed Solution: A new Fill Mead First Adaptive Management Program should be instituted, where allocations are based on percentages of projected actual snow and real runoff forecasts, rather than simply a number on paper that fluctuates over the years and recently has often not existed. The allocations protect the river itself, as they only add up to 90% of the total water in the basin being used, allowing the system to have some natural surplus water to ensure storage and successful water delivery to Mexico each year. Colorado River Basin states will be allowed to use up to their percentage of allocated water each water year (Oct 1 - Sep 30), and any extra water that they manage to save that year will be certified from the USBR in a certificate stating that the state has that credit that they can use in its entirety or split up to use as extra water to spend in a Water Year of surplus, defined as >12 MAF of projected inflow. This makes sure that the system will not crash if states redeem their water credits all at once, as they can only be redeemed when there is more than enough water to go around. Starting on October 1st, the start of each water year, Upper Basin states will utilize monthly reports from the Colorado Basin

River Forecasting Center (CBRFC) of Snow Water Equivalent (SWE) in the Upper Colorado River Basin to see which side of average the snowpack, and therefore runoff, any given year will be. Also, states will be able to utilize data of the Antecedent Snow Moisture in the Upper Basin from the CBRFC November 15th Soil Moisture Report to calculate projections of inflow, and whether a given state is over- or under-consuming water, throughout the winter. The main predictor that will be utilized when it becomes available is the projected Natural Flow at Lees Ferry, which is updated monthly. This will allow states to gauge the amount of water they can use from Oct 1st until April 1st, when states will be given the finalized apportionment of their percentages of the water until the end of a given water year. The USGS will track how much water Upper Basin states are pulling from the Colorado River and its tributaries before it reaches Lake Mead and the Lower Basin states, and USBR will track downstream deliveries as well as water credits that transfer from water year to water year. In years where there is less than 5 MAF projected to flow through at Lees Ferry in the April 1st forecast, there will be an emergency system preservation operating tier shown in the following tables. Now, there are many historical and political implications to this plan, most prominently the dissolution of the 1922 Colorado River Compact. This will allow us to tear down the great divide that has separated the Upper and Lower Basins for over a century, and treat them like the single hydrological and administrative area that they should be. Furthermore, all Native American Tribal water rights from the Colorado River are going to be separated from the states to prevent discrimination and lack of deliveries from the states. These have been split into their own category that will have its own seat at the table during discussions and negotiations, and will be overseen by the Bureau of Indian Affairs. This federal oversight is in place as a stabilizing mechanism to ensure that distributions of water in the Colorado Basin stay coordinated with the federal government. This

is crucial to keep a system of checks and balances on the USBR, NPS, and GCNRA federal entities to stop any of them from taking advantage of the system. Throughout the history of the Southwest, we have been able to see that the more divisions and breakdowns there are in water management, the more complex things are, and the more squabbles over details lost in communication there are in federal negotiations. Therefore, this plan is keeping things as simple as possible, dispersing water to the countries, states, and sovereign tribal nations of the Southwest, and letting each group manage their own deliveries of allocations and how their senior water rights will work. Another radical part of this plan is changing Mexico's allocation to a percentage rather than a fixed amount. Minute 323 of the 1944 US-Mexico Water Treaty, which apportions 1.5MAF each year to Mexico, allows for lowering of water deliveries based on Lake Mead elevations. However, if this plan is to be carried out, it is highly likely that it will necessitate a new minute being added to the treaty to accommodate the FMFAMP. If we are going to redo the entire system to reflect the actual amount of water available, every single customer of the river needs to be apportioned a percentage rather than a set amount, not just customers in the US. As seen in the tables, even when operating in a normal tier of water flows, there is only 90% of the water in the basin divvied between the customers. This is intentional and meant to provide an environmental buffer so that the system itself has some of its own water to account for seepage and evaporation. This hydrological realism of leaving water in the basin is an exponentially better option than guaranteeing every single drop of projected water to somebody. Not just for the environment, but for the preservation of Southwestern living. The Fill Mead First Adaptive Management Plan, if implemented in its entirety, will allow Southwestern America to adapt to the variability of water years and stably distribute water for many years to come.

FMFAMP Water Allocations Chart

~16.6% decrease ↷ ~13.3% decrease ↷

Entity	Normal Tier (>11MAF)	Drought Tier (7-11MAF)	System Preservation Tier (<7MAF)
Total Basin Use	90%	75%	65%
California	16.5%	13.7%	11.8%
Colorado	15.2%	12.7%	11.0%
Arizona	11.0%	9.2%	8.0%
Utah	7.5%	6.3%	5.5%
Wyoming	5.4%	4.5%	3.9%
New Mexico	4.8%	4.0%	3.5%
Nevada	1.4%	1.2%	1.0%
Mexico	8.2%	6.8%	5.9%
Tribal Nations	20.0%	16.6%	14.4%

To ensure honesty and transparency of water use within the Upper Basin States, the USGS will utilize real-time monitoring at key diversion points that include but are not limited to:

- Wyoming
    - Fontenelle Reservoir Outflow
    - Flaming Gorge at WY/UT state line

- Utah
    - Sylar Tunnel (Strawberry Reservoir)
    - Duchesne Tunnel
    - Flaming Gorge Dam (measuring use of Green River between WY and the dam)
    - Stillwater Tunnel

- Colorado
    - Alva B. Adams Tunnel (Lake Granby)
    - Moffat Tunnel (Fraser River)
    - Adams Tunnel (Grand Lake)
    - Roberts Tunnel
    - Boustead Tunnel (Turquoise Lake)
    - Aspinall Units (Gunnison River)

- New Mexico
    - Azotea Tunnel (San Juan River)
    - Navajo Dam

Letter #: 2096

Date Received: 2/26/2026

Sender Names: 2079: Joel Welsh

Emails: 2079: boxpurple2@everyactioncustom.com

Organizations:

Subject: Grand Canyon water management issue - Time has come to make some decisions...

DOI - . Dear Carly Jerla Bureau of Reclamation, Water management in the lower Colorado Basin has been a patchwork of politically and emotionally derived decisions that have led us all to the current situation. But now is the time to come together and make the correct decisions for all stakeholders and the river itself. It is obvious that the Colorado River, under its current use expectations, cannot sustain two dams. It is time to decommission Lake Powell and the Glen Canyon Dam and let that water flow on in to Lake Mead. Nothing too complicated about that suggestion. Just need some leadership and courage to make it happen. Very similar to the courage that has yielded success on the Klamath River in California and the Elwha River in Washington. Sincerely, Mr. Joel Welsh 857 Red Fox Rd Columbus, NC 28722-6718 boxpurple2@yahoo.com

Letter #: 1790

Date Received: 2/20/2026

Sender Names: 1779: David West

Emails: 1779: David.West.1117348382@advocatesmessage.com

Organizations:

Subject: feedback on the Post-2026 Colorado River Guidelines

DOI - . To the U.S. Bureau of Reclamation,Please take bold action immediately to address the deteriorating conditions on the Colorado River.The existing rules that expire at the end of 2026 are not protecting water levels in Lake Powell and Lake Mead and ensuring water available in the Colorado River to support its people, economies, and ecosystems. As a result, Lake Powell elevations are predicted to reach the critical (minimum power pool) elevation by mid-July of 2026. Reaching critical water levels at Lake Powell not only compromises the ability of the dam to deliver water downstream and generate power but also puts at risk river flows in the Grand Canyon and its cultural and ecological resources.We need to rebalance water uses in the Colorado River Basin. The promises made 100 years ago are not attainable in the 21st century given how significantly climate change has reduced water supplies. Further, the new rules need to ensure that tribes and the environment receive an equitable share of the river for the future.Please build a just and sustainable Colorado River Basin by taking these actions:* Begin a comprehensive study of Glen Canyon Dam infrastructure to ensure that the dam's design does not prevent adequate flows from being released through the dam as critically low water levels become the norm.* Encourage the Secretary of the Interior to direct and fund the Glen Canyon Dam Adaptive Management Program to develop a plan for how to operate Glen Canyon Dam to meet the mandates of the Grand Canyon Protection Act of 1992 when Lake Powell falls below critical elevations (3,525 feet, 3,500 feet, and 3,490 feet).* while the infrastructure and operational studies are in progress and until solutions are implemented, prioritize the following to protect Grand Canyon flows and resources:o adhere to the Grand Canyon Protection Act of 1992, which mandates that releases from Glen Canyon Dam protect and improve the cultural and ecological values of Glen Canyon National Recreation Area and Grand Canyon National Park. This includes protecting the canyon's native fish, beaches, and cultural and archaeological sites.o keep Lake Powell water levels above 3,525 feet to ensure high flow experiments, that protect the ecology of the Grand Canyon, can continue to occur.o Until a physical barrier is built to prevent non-native fish from passing through the dam, prioritize keeping Lake Powell above 3,540 feet to limit non-native fish passage.o formally commit to continue cool water releases beyond 2027 from Glen Canyon Dam's river outlet works to maintain temperatures that discourage nonnative fish reproduction. If cool mix flows cannot be maintained, keep Lake Powell above 3,570 feet.o Make sure that Glen Canyon Dam releases accommodate the need for variable high and low flows in the canyon, but limit steady high-volume releases to avoid eroding too much sediment from Marble and Grand Canyons.Sincerely,David West

Letter #: 433

Date Received: 2/20/2026

Sender Names: 427: Iris Westdyk

Emails: 427: noazchix@yahoo.com

Organizations:

Subject: Colorado River basin Public input February 19, 2026

DOI - . Good eveningWe must declare a building moratorium for the next Five years until we can adequately determine Water availability for future development.Home owners and Businesses should be encouraged to use reclaimed water from their properties., to water shrubs and trees. Water should be legal to collect.Fresh Water should be available to Farmers and Ranchers . America wants to consume food grown in the United States.Keep our lakes full.... And ration water seasonally.The American people should enjoy their lakes and streams..... Making families strong. Thank youIris WestdykSent from Yahoo Mail for iPhone

Letter #: 3628

Date Received: 2/27/2026

Sender Names: 3591: Carole WHITEHEAD

Emails: 3591: carolegwhitehead@gmail.com

Organizations:

Subject: COLORADO RIV

DOI - . PROTECT THE COLORADO RIVER, ON WHICH A HUGE AREA OF THE USA AND MILLIONS OF OUR PEOPLE DEPEND. THERE IS NO LIFE WITHOUT WATER!

Letter #: 6861

Date Received: 3/1/2026

Sender Names: 6829: William Wilkening

Emails: 6829: wfwilkening@gmail.com

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To whom it may concern,I'm writing to comment on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.Considering the continuing reduced snowpack at this date in the Upper Colorado basin and the fact that we have had five of the last six years below the 30-year median, we need to change how we are operating Lake Powell. There is not enough water available to continue to try to maintain it. We need to develop a method of by-passing Glen Canyon Dam and use the water to preserve the viability of Lake Mead.We can no longer accept the 300,000 to 500,000 acre-feet of water lost to evaporation. Especially, when Arizona will have to cut back on it's CAP allotment and cities, such as Tucson will lose over 80,000 acre-ft of their original 144,000 acre-ft.With the current method of trying to maintain both Lake Mead and Lake Powell, we are injecting uncertainty into the economies of all the states along the Colorado. We have enough problems to work on, let's eliminate a pressing one!Thank you for your time and consideration,

William Wilkeningwfwilkening@gmail.comTucson, Arizona

Letter #: 6204

Date Received: 3/1/2026

Sender Names: 6177: Catherine Williams

Emails: 6177: info@greatbasinwater.org

Organizations:

Subject: Catherine Williams Comments on Colorado River

Great Basin Water Network DOI - . The DEIS Avoids A Hard Look At Cumulative ImpactsThe document fails to consider the following:The DEIS ignores the complete geographic scope, and the impacts of that narrowed scope from curtailments, inaction, and limited action in directly affected communities in the Lower Colorado River Basin.Air quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water availability impacts on communities in the Lower Colorado River Basin are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Impacts on Lower Region MSCP (27 species including listed Endangered Species) are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Socioeconomic impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts on Lower Colorado River communities that will result from the alternatives in the DEIS.Impacts on recreation facilities, refugia, park service units, federal infrastructure, and directly connected waterways of the Colorado River System are too narrowly reviewed in the Technical Appendices.If you have any additional questions please contact me.Catherine Williams(c) Great Basin Water Network.
Powered by weForms.

Letter #: 6001

Date Received: 3/1/2026

Sender Names: 5975: Lora M. Williams

Emails: 5975: ladyloramariewilliams@gmail.com

Organizations:

Subject: Protect the Colorado River!

DOI - . Do the right thing & protect this & all essential environmental resources! Voters & citizens are watching!Sincerely, Lora Marie Williams

Letter #: 3876

Date Received: 2/26/2026

Sender Names: 3835: paula williams

Emails: 3835: pswill5068@att.net

Organizations:

Subject: Protect Colorado river

DOI - . Sent from pw iPad

Letter #: 7545

Date Received: 3/2/2026

Sender Names: 7496: Rich Willis

Emails: 7496: rwillis711@gmail.com

Organizations:

Subject: Formal Public Comment: Post-2026 Colorado River Operations Draft EIS – Desalination & Augmentation

DOI - . Dear Bureau of Reclamation Team, As a resident of both Arizona and Colorado, I am writing to provide my formal input on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines. My unique position as a stakeholder in both the Upper and Lower Basins provides me with a firsthand perspective on the critical need for a sustainable, long-term solution to the systemic over-allocation and chronic drought facing the Colorado River System. To move beyond the cycle of temporary "band-aid" cuts, I urge the Bureau to prioritize water augmentation via large-scale ocean desalination. While conservation remains essential, we must introduce new water into the system to alleviate the long-term burden on the river. I propose that the Post-2026 plan include the following pillars: Regional Cost-Sharing: Distributing the capital and operational costs of desalination infrastructure across all basin users, reflecting the shared regional benefit of a stabilized river. Environmental Stewardship: Integrating robust brine management and disposal plans to protect marine ecosystems, ensuring that our search for fresh water does not negatively impact ocean health. Thank you for your commitment to a collaborative and innovative future for the American Southwest. I look forward to seeing bold augmentation strategies and infrastructure-based solutions included in the final Record of Decision. Sincerely, Rich Willis 970-316-0036

Letter #: 3955

Date Received: 2/27/2026

Sender Names: 3912: Fred Wills

Emails: 3912: fredwills@att.net

Organizations:

Subject: Protect the Colorado River

DOI - . The Colorado River was historically, and is still overallocated, and flows are decreasing due to climate change.The Bureau of Reclamation should strengthen the Post-2026 Colorado River Basin Draft EIS to meaningfully address this problem. It must ensure the public can comment on its revised proposal before a final decision is made.The Bureau should make sustainability, demand reduction, and meaningful consultation its primary goals. Simply dividing up a dying river is not enough.Fred Wills, 11322 Two Wells Drive, San Antonio TX 78245

Letter #: 7299

Date Received: 3/2/2026

Sender Names: 7259: Tena M. Wilson

Emails: 7259: Bodyawareness@ymail.com

Organizations:

Subject: Water alternatives

DOI - . Hello, As an Arizona resident I think the Supply driven or the Continued Current Strategies Comparative alternatives are best for our future water supply. With Respect, Tena Marie Wilson

To Reclamation, 2/21/26

Please protect the humpback chub. And the Colorado River.

From,

winnie



HUMPBACK CHUB

Letter #: 454

Date Received: 2/22/2026

Sender Names: 445: Sally Wirth

Emails: 445: sawirth7@gmail.com

Organizations:

Subject: Colorado River basin agreement

DOI - . I am a resident of NV which has been working for years on water conservation despite growing.Water is not owned by any one state. All states using a declining resource should work to conserve that resource rather than claim their share and the heck with everyone else.The old agreement certainly shorted NV and yet we have tried and continue trying to find ways to make our share work. CA was allotted larger than fair share mostly from being more developed than their neighbors. So I feel upper as well as lower basin states need to implement water savings initiatives. And I think the % allotments need to be recalculated for a more equitable share now that populations in the states have radically changed since the original compact. Thank you.Sally WirthMoapa, NV

Letter #: 3242

Date Received: 2/27/2026

Sender Names: 3212: Jennie Wiseman

Emails: 3212: wiseman.jennie@gmail.com

Organizations:

Subject: Colorado River

DOI - . Defend this river instead of ruining it. Do your job. Sent from my iPhone

Letter #: 2816

Date Received: 2/26/2026

Sender Names: 2791: Matthew Witting

Emails: 2791: wittingm@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, Thank you for this opportunity to provide input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - Draft Environmental Impact Statement (Post-2026 Operations). I urge you to take immediate action to protect the future of the Colorado River Basin and to recognize the many ecosystem services that the river and its tributaries provide. When determining the preferred Alternative for Post-2026 Operations, I request that the Bureau of Reclamation prioritize the below elements and work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river and American treasure for generations to come. - Storage in Lake Powell and management and infrastructure of the Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. - Prioritize infrastructure updates at Glen Canyon Dam in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. - Please balance conservation measures and delivery of water between the Upper and Lower Basins, maintaining minimum flows at all times in the Grand Canyon with allowing for flow variability across the annual hydrograph to support both the river ecosystem and the river recreation opportunities that have meant so much to so many people. - Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities, and seek to provide benefits to more than one group whenever possible. - Analyze, evaluate, and mitigate impacts to river recreation opportunities on the Colorado River and the San Juan River due to changing reservoir levels. - Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after the fact. Judging from current negotiations, postponing these considerations is equivalent to tabling them forever. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. My two recent trips through the Grand Canyon on the Colorado River have been incredibly meaningful for me and my family. Keeping the river flowing and healthy is integral to protecting the safety and welfare of the people who rely on it. We must work with what nature provides and do so together. All of the Colorado River's water users are going to feel a strain, but we cannot sacrifice these special river canyons and the ecosystem services that they provide. Sincerely, Mr. Matthew Witting 3411 14th St S Arlington, VA 22204-5009 wittingm@gmail.com

Letter #: 3435

Date Received: 2/26/2026

Sender Names: 3404: Carol wolkow-price

Emails: 3404: cwolkowprice@gmail.com

Organizations:

Subject: protect the colorado river

DOI - . don't steal water from communitiesthe Bureau of Reclamation can strengthen the Draft EIS by:Centering climate science and realistic supply projectionsProtecting water quality and reducing pollution impacts as flows declinePreventing further ecological collapse in the Colorado River Delta and Basin tributariesRespecting Tribal water rights and ensuring meaningful Tribal consultationPrioritizing demand reduction and conservation over unsustainable allocations

Letter #: 3355

Date Received: 2/26/2026

Sender Names: 3324: Margaret Woll

Emails: 3324: marjean23@aol.com

Organizations:

Subject: Colorado River

DOI - . Sent from my iPhone

Letter #: 3801

Date Received: 2/26/2026

Sender Names: 3762: MARGARET WOLL

Emails: 3762: mhildeb408@aol.com

Organizations:

Subject: Colorado River

DOI - . Sent from my iPhone

Letter #: 1518

Date Received: 2/25/2026

Sender Names: 1507: Bill Wolverton

Emails: 1507: spx6432w111572@outlook.com

Organizations:

Subject: Post-2026 Draft EIS Public Comment

DOI - . To: US Bureau of Reclamation,Herewith my comments on the Draft Environmental Impact Statement (EIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. This Draft fails to meet its stated purpose and need, as it ignores options that would provide operational flexibility and environmental benefits.Specifically, the new Colorado River guidelines must:- Analyze river-level bypass of Glen Canyon Dam to ensure naturalized flows through the Grand Canyon, continue Glen Canyon's ecological restoration, and provide maximum operational flexibility in the system. The dam has become a liability preventing water from flowing downstream. Failing to study river-level bypass needlessly limits options for the river, its users, and its ecosystems.- Study a "Fill Mead First" option, prioritizing water storage in Lake Mead before Powell. Today's hydrology does not support filling both Lake Mead and Lake Powell. Given this reality, it doesn't make sense to continue needlessly drowning the national park-caliber canyons in Glen. Analyzing different variations of a one-reservoir option would benefit the ecosystems and management of the entire Basin.- Acknowledge the extensive emerging resources in Glen Canyon. In the years since Lake Powell reservoir has declined, there has been an amazing reemergence of wonders like Cathedral in the Desert and Gregory Natural Bridge, as well as vital riparian ecosystems, cultural sites, and new recreation opportunities. These resources must be given equal value to other resources across the Basin.- Require curtailment plans from each state, and prohibit new non-Tribal diversions. Federal agencies must take the supply and demand crisis seriously, imploring each state to produce plans to reduce demand. These agencies should also put a moratorium on new water diversions, with the exception of Tribes with senior water rights.I have been hiking the canyons of the Escalante River and Glen Canyon since 1979, 47 years now. I witnessed the tragic loss of the confluence of Coyote Gulch and the Escalante when the reservoir reached full pool for the first time in 1980, and the even worse disaster in 1983 when it was overfilled in order to prevent destruction of the spillways of the dam. It was heartbreaking. This was the only place in Glen Canyon that I had the good fortune to see before being drowned.I moved to Escalante in 1986 because I had fallen so hopelessly in love with the canyons that I couldn't get enough. In the years since then I have watched with joy as the reservoir has fallen, making it possible to see places that had long been drowned - Willow Gulch, 50 Mile Gulch and Gregory Bridge, Davis Gulch, the lower Escalante River, Cathedral in the Desert, Cataract Canyon, lower Dark Canyon, Lake Canyon, the lower San Juan River, North Gulch and Moqui Canyon, Smith Fork, Twilight Canyon, Cottonwood/Reflection Canyons, Llewellyn Gulch, West Canyon, Kaibito Creek/Choal Canyon, Seven Mile Canyon, Bishop Canyon. The recovery that I have witnessed in these canyons has been astounding. First the amazing flushing out of the staggering amount of sediment that had accumulated in all of them, and then the recovery of the riparian areas with mostly native species.Since being drowned in 1980 the lower end of Coyote Gulch has recovered almost completely. Anyone going there for the first time will be hard put to see any signs of the inundation - only a few small remnants of sediment clinging to ledges out of reach of any floods. Several years ago I measured the height of the sediment above the streambed and found it to be about 17 to 18 feet, all deposited from 1980 to 1983, all of it gone now.The reservoir in Glen Canyon, AKA "Lake" Powell, cannot endure. As long as water flows into it the sediment will continue to accumulate, until it fills it in up to the level of whatever the lowest outlet of the dam may be. How long that will take I don't think anyone really knows, but it will happen. The only thing that can delay that day is a river level outlet in the dam. It's time to start planning for it.Glen Canyon never should have been drowned. Now that it is coming back from the grave it must not be drowned again.Thank you for your consideration.,Bill WolvertonEscalante, Utah

Letter #: 8704

Date Received: 3/3/2026

Sender Names: 8621: Cody Woods

Emails: 8621: mcodyw@gmail.com

Organizations:

Subject: Public comments regarding Lake Powell

DOI - . Public Comment to the U.S. Bureau of Reclamation Regarding Lake Powell Operations To Whom It May Concern: My name is Cody Woods, and I am a resident of Page, Arizona. I am writing to provide public comment regarding ongoing and future operational decisions for Lake Powell. These decisions directly affect the stability, safety, and economic well-being of my community. Page is uniquely tied to Lake Powell--our water supply, our local economy, and the livelihoods of thousands of residents depend on the lake's continued viability. First and foremost, Lake Powell is the primary municipal water source for Page and surrounding communities. Maintaining sufficient lake elevation is essential to ensure reliable intake operations and to avoid costly or disruptive emergency modifications. Any operational plan that allows the lake to fall to critically low levels places our community's basic water security at risk. In addition to water supply, Page relies heavily on tourism associated with Lake Powell. The lake supports local businesses, hospitality workers, outfitters, guides, and countless secondary industries. Tourism is not a peripheral benefit--it is the economic backbone of our region. For this reason, maintaining lake elevations at 3,588 feet or higher is critical. At or above this level, marinas, launch ramps, and recreational infrastructure can function safely and predictably. When the lake drops below this threshold, access becomes limited or impossible, resulting in immediate and severe economic impacts for our community. The consequences of low lake levels are not theoretical. In recent years, Page has experienced firsthand the closures of boat ramps, reduced visitation, and the financial strain placed on local families and businesses. These impacts ripple through every part of our community--from small business owners to seasonal workers to long-term residents who depend on a stable local economy. As the Bureau evaluates operational strategies for the Colorado River system, I respectfully urge you to prioritize: * Protecting municipal water intake reliability for Page and surrounding communities. * Maintaining Lake Powell at or above 3,588 feet, the elevation at which tourism infrastructure can operate effectively. * Recognizing the economic dependence of Page on a functional and accessible Lake Powell. * Ensuring that any long-term management plan includes provisions for community stability, not just hydrologic modeling. Page is not simply adjacent to Lake Powell, rather we exist because of it. Decisions made now will determine whether our community remains viable in the years ahead. I ask that the Bureau of Reclamation adopt management strategies that safeguard both the water security and economic sustainability of Page, Arizona. Thank you for considering these comments and for your continued work on behalf of the communities that depend on the Colorado River. Respectfully, Cody Woods Page, Arizona

March 2, 2026

To the U.S. Bureau of Reclamation:

I write to comment on the Draft Environmental Impact Statement (EIS) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. As written, the Draft EIS fails to adequately analyze impacts to vegetation and associated wildlife resources in Glen Canyon National Recreation Area (GCNRA), particularly within the extensive landscape exposed by long-term reservoir recession.

Section 3.9.1 references approximately 59,000 acres of exposed land since 2011. However, the elevation–area–capacity relationships used by the agency demonstrate that at the current reservoir elevation (~3,531 feet), approximately 100,000 acres of formerly submerged landscape are exposed overall, relative to full pool (Root and Jones 2022). Exclusively framing the scale of the recovering landscape relative to 2011 reservoir levels substantially misrepresents the environmental footprint currently subject to ecological succession and operational influence. The difference between the acre figures represents an area larger than Zion National Park, and thereby materially affects the scope of vegetation and habitat analysis undertaken in the Draft EIS.

Although Section 3.14.1 acknowledges the emergence of this broader landscape in the recreation context, Section 3.9 does not proportionately evaluate the vegetation and habitat resources within that same footprint. The absence of comprehensive vegetation baseline data across a landscape of this magnitude is not justification for limited analysis. Under NEPA, incomplete or unavailable information relevant to reasonably foreseeable significant impacts must be disclosed and addressed, not used to narrow the scope of review.

Importantly, the draft EIS states that native riparian shrubs outcompete invasive shrubs in Lake Powell's reservoir bed in areas exposed for more than three years (Arens, 2023). At the current reservoir level, this recovering landscape includes nearly 300 miles of riparian corridors and spring-dependent systems. This linear extent exceeds the length of Grand Canyon National Park's mainstem corridor, an environment which receives substantial consideration relative to the ecosystem upstream of the Glen Canyon Dam. The exposed reservoir bed, however, is not marginal habitat: the landscape exists within one of North America's most biodiverse provinces (e.g. Rickets et al. 1999; Kartesz and Farstad, 1999), and a coincides with a sub-region of the province known to support exceptionally high levels of plant endemism (Krause et al. 2015). In particular, spring-dependent habitats occurring here are considered keystone ecosystems and are known to support high concentrations of endemic and imperiled species (e.g. Stevens and Meretsky, 2008). Observations in GCNRA indicate that some spring systems re-establish within a few years of reservoir recession (Arens 2023). These habitats are highly sensitive to disturbance and invasive species pressure (Perla and Stevens, 2008), yet the Draft EIS does not meaningfully evaluate how fluctuating reservoir elevations under different operational alternatives may influence their stability, persistence, or vulnerability.

Additionally, this recovery is occurring in a region in which riparian areas are known to support disproportionate biodiversity relative to their areal extent, including approximately one-third of regional vascular plant species (McLaughlin 2004) and markedly higher avian diversity than adjacent uplands (Strong & Bock, 1990). Given the Draft EIS's acknowledgment that native riparian shrubs establish rapidly following dewatering (Arens 2023), and that substantial reaches of newly exposed corridor have remained above water for years to decades, the potential ecological value of these recovering riparian systems warrants analysis commensurate with their scale. However, the Draft EIS does not meaningfully evaluate how differences among operational alternatives may influence the duration, continuity, or stability of these riparian corridors as they continue to establish.

Because vegetation forms the structural foundation of wildlife habitat and ecosystem function, insufficient vegetation analysis necessarily cascades into insufficient wildlife analysis. This is particularly concerning in the context of the southwestern willow flycatcher (*Empidonax traillii extimus*), a federally endangered species with designated critical habitat in the San Juan River, a direct tributary to Lake Powell. The recovering riparian corridors along the San Juan arm and other tributaries fall within the northern extent of the species' known range. The Draft EIS itself acknowledges that "newly established riparian vegetation can be used as breeding habitat by southwestern willow flycatchers within 3 years of establishment." Given that substantial portions of the exposed riparian landscape have remained above water for decades, and that the EIS acknowledges both rapid native shrub establishment (Arens, 2023) and limited baseline vegetation monitoring, it is reasonably foreseeable that portions of the recovering San Juan reach and adjacent tributaries may already provide suitable breeding or dispersal habitat for the species.

The potential expansion or contraction of suitable habitat under different operational alternatives — particularly those affecting duration of exposure, frequency of re-inundation, and shoreline fluctuation amplitude — warrants explicit analysis. Yet the Draft EIS does not meaningfully evaluate whether fluctuating reservoir elevations may enhance, destabilize, or eliminate potential habitat for southwestern willow flycatcher or other riparian-dependent species. In the absence of comprehensive vegetation data across nearly 300 miles of re-emerged riparian corridor, proceeding without a rigorous assessment of endangered species habitat suitability is inconsistent with NEPA's requirement to take a 'hard look' at reasonably foreseeable ecological consequences.

In short, the absence of long-term data at this scale should prompt more explicit uncertainty analysis under 40 CFR §1502.22, not a narrowing of scope. Lake Powell's recession has led to one of the largest ecological restoration events in the American Southwest. This recovering area is potentially highly ecologically significant, but its future will be directly influenced by federal operational decisions. To ensure effective consideration of this landscape, the Draft EIS must be amended to:

1. Correctly characterize the total scale of exposed landscape.
2. More rigorously evaluate vegetation impacts across operational alternatives.
3. Explicitly analyze uncertainty and cumulative effects in recovering riparian, spring-dependent, and upland habitats.

4. Reassess assumptions about terrestrial wildlife species which have been given impact consideration.

Without these revisions, the vegetation and wildlife analyses risk falling short of NEPA's requirement to fully inform decision-makers and the public of the environmental consequences of federal action.

I have participated in long-term ecological monitoring and invasive species treatment evaluation within the recovering reservoir bed of Lake Powell, including work referenced in Arens (2023). Thank you for consideration of these concerns.

Respectfully,

Katie Woodward
Master of Environmental Management
M.S. Ecology Candidate
Restoration Director, Grand Staircase Escalante Partners
(submitted in personal capacity)

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Letter #: 7563

Date Received: 3/2/2026

Sender Names: 7514: joel wooten

Emails: 7514: joeltotopmountain@gmail.com

Organizations:

Subject: Clean water

DOI - . Clean water is a moral issue? Joel Wooten

Letter #: 8603

Date Received: 3/2/2026

Sender Names: 8525: Jeff Y

Emails: 8525: yakijy@gmail.com

Organizations:

Subject: AZ water supply ideas

DOI - . Hi, I have a couple of ideas I wanted to send. 1. If the Feds will determine the water allocation, does it have a formula to take into account what companies vital to US interests that Phoenix has, compared to the other states? 2. Can AZ determine if water wells on state property can be used to supplement the Colorado river? 3. Can Phx build de-salination plants to supply CA with water, and use those credits towards the Colorado river? 4. Do other states have access to inland bodies of water that they can use instead of Colorado river, and allow AZ to 'purchase' some of the river rights? Thanks, Jeff

Letter #: 8402

Date Received: 3/2/2026

Sender Names: 8316: Jennifer Yachnin

Emails: 8316: jyachnin@eenews.net

Organizations:

Subject: List of comments

DOI - . Hi - I didn't see a docket listing for the CRB Post 2026 plans, is it possible to get a list of commenters after the deadline closes today? Thank you - Jennifer ---------- Jennifer Yachnin E&E News / POLITICO Denver office (303) 355-2979 Mobile (202) 907-9649 Signal: jyachnin.35, or mobile

Letter #: 3589

Date Received: 2/26/2026

Sender Names: 3555: Yahoo

Emails: 3555: ackerperson@yahoo.com

Organizations:

Subject: Protect

DOI - . the Coloradoriver. :

Letter #: 2105

Date Received: 2/26/2026

Sender Names: 2088: Emily Yuratovac

Emails: 2088: Emily.yuratovac@everyactioncustom.com

Organizations:

Subject: Public Comment on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead DEIS

DOI - . Dear Carly Jerla Bureau of Reclamation, The Grand Canyon river Basin is truly my favorite place in the whole world. It is a soul healing, community building, good human developing kind of place and allowing Americans to continue to use this space for recreation in the decades to come is the only right choice. I know this can be done with consideration to drinking water, irrigation, and energy needs. We have seen examples where this has been done well all over the world and we can do this too. Please be on the right side of history and not on the side with the individuals who are the reason no one gets to experience the magic of Glen Canyon. Also, if you have never been down a Grand Canyon river trip, it is probably the most amazing and soul healing thing you could do for yourself and your family. Thank you for your time. Thank you for this opportunity to provide input on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead - Draft Environmental Impact Statement (Post-2026 Operations). I urge you to take immediate action to protect the future of the Colorado River Basin and to recognize the many ecosystem services that the river and its tributaries provide. When determining the preferred Alternative for Post-2026 Operations, I request that the Bureau of Reclamation prioritize the below elements and work directly with the seven basin states and Tribes to ensure that water conservation measures are effective and capable of supporting a living river for generations to come. - Storage in Lake Powell and management and infrastructure of Glen Canyon Dam must support opportunities for High Flow Experiments in the Grand Canyon for the purposes of sediment and nutrient transport. - Infrastructure updates at Glen Canyon Dam must be prioritized in the short-term to ensure that the dam is capable of passing variable flows downstream as reservoir levels become lower and less predictable. - Conservation measures and delivery of water between the Upper and Lower Basins must balance maintaining minimum flows at all times in the Grand Canyon with allowing for flow variability across the annual hydrograph to support both the river ecosystem and river recreation opportunities. - Water delivery measures that implicate Blue Mesa and Flaming Gorge Reservoirs must consider immediate and downstream impacts to river ecosystems and recreation opportunities, and seek to provide multiple benefits whenever possible. - Impacts to river recreation opportunities on the Colorado River and the San Juan River due to changing reservoir levels must be analyzed and mitigated. - Post-2026 Operations must analyze and consider how operations will affect daily flows in the Grand Canyon and upstream river segments before a final decision is determined, not after. - Operations and agreements must provide for Tribal water rights and respect Tribal sovereignty throughout the Colorado River Basin. Best, Emily Yuratovac Sincerely, Ms. Emily Yuratovac 318 SW Maricopa Dr Bend, OR 97702-1144 Emily.yuratovac@gmail.com

Letter #: 5221

Date Received: 2/28/2026

Sender Names: 5185: Sandra Zelasko

Emails: 5185: info@greatbasinwater.org

Organizations:

Subject: Sandra Zelasko Comments on Colorado River

Great Basin Water Network DOI - . The document fails to consider the following:The DEIS ignores the complete geographic scope, and the impacts of that narrowed scope from curtailments, inaction, and limited action in directly affected communities in the Lower Colorado River Basin.Air quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water quality impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Water availability impacts on communities in the Lower Colorado River Basin are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Impacts on Lower Region MSCP (27 species including listed Endangered Species) are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts that will result from the alternatives in the DEIS.Socioeconomic impacts on communities are too narrowly reviewed in the Technical Appendices. The DEIS avoids addressing those direct impacts on Lower Colorado River communities that will result from the alternatives in the DEIS.Impacts on recreation facilities, refugia, park service units, federal infrastructure, and directly connected waterways of the Colorado River System are too narrowly reviewed in the Technical Appendices.Three Alternatives Do Not Likely Comply With The Law Of The River. Programmatic Review Is Necessary And So Is Congressional ActionIn Appendix C, the DEIS implies that modeling justifying three of the proposals "may not be implementable" because potential non-compliance with "laws, contracts, agreements, and other authorities that are part of the Colorado River legal and contractual framework referred to as Law of the River." That is a reference to the Enhanced Coordination, Maximum Operational Flexibility, and Supply Driven Alternative. Without any deal in place among the states or congressional action, a Record of Decision supporting those alternatives poses legal challenges that may be insurmountable.Therefore, according to the DEIS, the No Action Alternative and Basic Coordination Alternative are among the only options that could avoid a legal challenge after a Record of Decision.Those options pose some of the worst outcomes for Lakes Powell and Mead. We believe that no course of action as put forth in the DEIS is a sufficient means of stabilizing the system under the current Law of the River framework. This is troubling considering Reclamation is predicting some of the most dire reservoir elevations ever in the coming two years.Reclamation should undertake a programmatic review as the states continue negotiating. This year's low flows will inevitably get people back to the negotiating table in a meaningful way. Congress will act when the reservoirs are in crisis. We have seen congressional, bi-partisan action multiple times in the past seven years. When Congress is ready, enlist the National Academy of Sciences to undertake a programmatic review in partnership with the Department of Interior, Reclamation and other cooperating agencies. This document is not the beginning of the end. We believe it is merely the end of the beginning.The DEIS Fails To Consider Impacts On Irretrievable Resources By Sanctioning The Repurposing Of Water ResourcesThe DEIS offers multiple alternatives that impose varying levels of cuts in the Lower Basin and no meaningful cuts in the Upper Basin. Some alternatives mention the possibility of Upper Basin "conservation" but those offerings do not describe who, what, where and when. There is nothing steadfast for cuts in the Upper Basin.The DEIS also showcases a modified version of the 2016 Upper Basin Depletion Schedule that still assumes considerable new uses of water in the Upper Basin in the coming decades. Because of the limited resources available, there's no doubting that cuts imposed on the Lower Basin will be repurposed by the Upper Basin. That repurposing defeats the intent of this analysis. Once that water is re-appropriated by Upper Basin regulators, waters with established beneficial uses will not return to where those uses were first proven in the Lower Basin. This is highly suspect.Furthermore, we question how Reclamation can execute its recognized authority to force a curtailment in one basin but not even questioning how development of new appropriations in another part of the basin will impact the whole system and those who had to undertake curtailment. Upper Basin reservoirs are subject to the "apportionments" among

the two basins, seven states and Mexico (See Colorado River Storage Project Act, Pub. L. No. 84-485, SS 4, 70 Stat. 107 (1956)). Reclamation has a great deal of say in how certain rights are managed in the system. But how can regulators sequester the differences between the starting and end points of a highly connected system where some users have established decades worth of use? This gray area is at the heart of the ongoing conflict among the seven states, and we request more information on this in the FEIS.We fear that it is an unacceptable practice to allow the Upper Basin to repurpose water from Lower Basin in the name of state-led permitting efforts in Colorado, New Mexico, Utah and Wyoming. Further declines in the system will challenge Reclamation's mission to protect infrastructure, ecosystems, and communities. It means less water making its way through the southernly reaches of the system in the majority of years if current trends continue. Every state needs a curtailment plan on the Colorado River. This DEIS fails to compel the Upper Basin States to meaningfully consider how they will act to protect federal assets and resources.Finally, this could also bring about conflict over tribal water rights in the Upper and Lower Basins -- especially where settlements have been established. There must be consideration of reducing, at a 1-for-1 rate, junior non-tribal use for those senior tribal rights that have not yet been put to use. How Reclamation would undertake this matter in the Upper and Lower Basin must included in any FEIS. Also, there must be consideration of how Reclamation would prevent new Upper Basin appropriations put forth by non-native water users from using, in a de facto sense, settled and adjudicated rights of Lower Basin tribes.DEIS Ignores Glen Canyon Dam's Antique PlumbingThe analysis in the DEIS fails to consider bypass, decommissioning, and other meaningful resolutions available at Glen Canyon Dam, which poses considerable concerns for water delivery and endangered species protections. We understand and respect the legal arguments for not including the One-Dam Alternative. But it is a mistake to not undertake comprehensive analysis on this matter. Keeping Lake Powell's elevations above 3550', 3525, and 3490' are not realistic scenarios for the long-term. Failure to include greater analysis on Glen Canyon Dam's river outlet works will ultimately cost us all -- imposing direct impacts on Lake Mead, Hoover Dam, other federal infrastructure, metropolitan areas, agricultural hubs, tribal resources, sensitive species, National Park Service units, U.S. Fish and Wildlife units, and other conservation areas in the Lower Basin.The DEIS' Purpose-And-Need Is Too Narrow And Segments Requisite ReviewsReclamation, admittedly so in its Purpose and Need statement, recognizes the grave uncertainties we face if conditions do not improve on the river system. Reclamation also recognizes the direct connections the DEIS makes with upstream infrastructure associated with the Colorado River Storage Project units and in Lower Basin units at Parker Dam, Davis Dam, Imperial Dam, and Palo Verde. The DEIS would benefit from greater analyses in the technical appendices dealing with directly related impacts at the dams during low-flow periods. The same can be said for analyzing impacts at all Colorado River Storage Project facilities in low-flow periods too. They will be essential for propping up Lakes Powell and Mead. What will operations look like if CRSP and Lower Basin Infrastructure are only operating collectively at 10-20 percent of normal? What can we expect? To say that management at Mead and Powell are not directly connected to that management is implausible.If you have any additional questions please contact me.Sandra
Zelasko(c) Great Basin Water Network. Powered by weForms.

Letter #: 631

Date Received: 2/24/2026

Sender Names: 621: Sandy Zelasko

Emails: 621: slzphoto@sbcglobal.net

Organizations:

Subject: Please support a smarter future for the Colorado River, and all who depend on it!

DOI - . Dear Bureau of Land Mangement I love the Colorado River! I have either rafted or canoed most of it and am outraged at the state of things. My main concern is the wildlife that call this ecosystem its home. WE MUST RESPECT THE COLORADO RIVER and do what is best for it. I am writing to encourage the Bureau of Reclamation to combine elements from the proposed alternatives in the draft Environmental Impact Statement (DEIS) to ensure a sustainable future for the Colorado River with new, long-term guidelines that: - Provide clarity and predictability: continued crisis management puts everything and everyone in the basin at risk. New guidelines must promote conservation and respond to conditions on the ground - Incorporate flexible, adaptive tools for conserving, storing, and managing water: new guidelines must allow for more flexibility in how water is stored and moved to protect and stabilize the system - Embed environmental stewardship: the Colorado River is more than a plumbing system. New guidelines must account for the river itself and the bounty of life it sustains. - Provides for meaningful and voluntary Tribal participation grounded in sovereignty and self-determination: the 30 federally recognized Tribes in the Basin must be included in decision-making. - And preserve pathways for advancing in-basin mitigation and continued binational cooperation with Mexico Sincerely, Sandy Zelasko 15864 Severino Ln Valley Center, CA 920827635 slzphoto@sbcglobal.net

Letter #: 7674

Date Received: 3/2/2026

Sender Names: 7622: Jonathan Zirkle

Emails: 7622: jonathan.zirkle@gmail.com

Organizations:

Subject: Colorado River Water

DOI - . Some land usages are more economically viable than others. Some land usages put more strain on resources than others. Some land uses that don't make a lot of money, require a fair amount of water, and are critical to the quality of life of average Americans. 1. Large City development is probably the most economically viable activity and should have the least subsidy of water. 2. Fracking, other industrial uses like chip fabs, data centers, mining, etc. are similar and should have no subsidy of water. 3. Small town and rural development, especially farming is far less economically important on a per acre basis, and needs first right to water usage. 4. Natural state and recreational usage is probably the least economically important and also needs first right to water usage. Both Rural development, recreational usage, and natural state are critically important to quality of life of average americans. With that in mind, allocate only excess water to city and industrial uses. Excess being defined as any water left over after maximal rural, recreational and natural state water is used. City and industrial users can and should obtain their water through desalination. Los Angeles, Pheonix, and Las Vegas are capable of building desalination facilities. The necessary canals are no more difficult to produce than the canals that carry freshwater today. This is good use for renewable energy, as a cloudy day or windless day won't matter. Nuclear is also an option as it is now capable of being produced safely. I would say any community with a population over about 20,000 should plan on getting their water from desalination if they are within 350 miles of a body of saltwater or if there is already an existing network of canals that can be used. Really, are you going to ruin the west for Los Angeles and Phoenix sprawl, and Las Vegas decadence? Do not prioritize the users that are best able to fend for themselves over users who are least able to obtain water. The West is a marvelous place made better by water. Don't steal it. Jonathan Zirkle

Letter #: 8106

Date Received: 3/2/2026

Sender Names: 8037: zwillick

Emails: 8037: zwillick@aol.com

Organizations:

Subject: Arizona's water future

DOI - . Please keep fighting for us! Our future in this state depends on water! Bonn'e Judge