



Via E-Mail and U.S. Postal Service

3/2/2026

United States Bureau of Reclamation  
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Dear Acting Commissioner Cameron:

The Arizona Power Authority (APA), the Arizona Municipal Power Users' Association (AMPUA), the Grand Canyon State Electric Cooperative Association (GCSECA), and the Irrigation and Electric Districts Association of Arizona (IEDA), (collectively, the "Organizations") appreciate the opportunity to submit public comment on the Bureau of Reclamation's (Bureau) Draft Environmental Impact Statement (DEIS) for the *Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead*, as published in Fed. Reg. Vol. 91, No. 11 (January 16, 2026).

### **Introduction**

The APA is a state agency established in 1944 to manage Arizona's allocation of hydroelectric power from Hoover Dam. In Arizona, this power is delivered to 63 electrical districts, irrigation districts, co-ops, tribes, and municipalities that serve irrigation, agricultural, commercial, and residential loads.

AMPUA is an association of Arizona public and consumer-owned power entities, including irrigation districts, electrical districts, electric cooperatives, municipally owned electric systems, the Salt River Project, and the Central Arizona Project.

GCSECA is a membership trade organization comprising six Electric Distribution Cooperatives and the Arizona Generation and Transmission Cooperatives, which collectively serve approximately 500,000 rural residents across 12 counties in Arizona. GCSECA's member cooperatives are rural, not-for-profit utilities owned and governed by their members.

IEDA is an Arizona statewide association of public bodies that have been involved in the delivery of water and electricity to agricultural, municipal, and industrial customers throughout Arizona since 1962.

Together, our organizations represent the majority of public power entities in Arizona, many of which receive federal hydropower resources.

## Comments Regarding the Seven Basin State Negotiations

Despite extensive efforts of leaders in the seven Basin States, the Bureau of Reclamation's deadline for a seven-state negotiated solution passed without reaching a consensus. Concerns regarding water allocations between the Upper and Lower Basins, Compact compliance, and hydrology uncertainty of the Colorado River have impeded negotiations. One major issue has not been discussed at length, however, is the impact that post-2026 operational decisions will have on federal hydropower – which will create challenges for both the Upper and Lower Basin states.

Without a seven-state agreement, the Bureau is expected to advance a new set of operating guidelines as a preferred alternative. That alternative may determine the operational management of water releases in the Colorado River Basin for the foreseeable future. On behalf of Arizona public power entities, we strongly encourage the Bureau to consider the following principles throughout the selection of a preferred alternative:

**Focus on the Near-Term** – Rather than finalizing operating guidelines spanning twenty years, it is critical that the Bureau prioritize operating guidelines for the next five years. A five-year framework would allow the Bureau flexibility to deploy all necessary tools to ensure reliable delivery of water and hydropower to contract holders during this time of hydrologic uncertainty and poor reservoir conditions. Recent history demonstrates that hydrologic conditions on the Colorado can dramatically change within a few years. As a seven-state long-term solution remains unattainable, a short-term solution can allow for negotiations to continue.

**Uphold the Compact** – in the absence of a seven-state agreement addressing Compact Compliance, it is important that any alternative identified by the Bureau must adhere to existing Compact obligations. The Compact currently requires 75-million-acre-feet of water over a ten-year period pass through Lees Ferry for the Lower Basin States, in addition to one-half of Mexico's entitlement. The lack of a new agreement does not invalidate past agreements. Any revisions to the Compact must be achieved between the Upper and Lower Basin States. To that end, the dams and reservoirs above Glen Canyon Dam should be operated to ensure compliance with the 10-year delivery water guarantee at Lees Ferry.

**Think Beyond Allocation Alone** – The negotiations have largely focused on reallocating a diminishing supply of Colorado River water. The outcome has been divisive negotiations that have led to the Upper Basin and Lower Basin accusing each other of not doing enough to protect the future of the River. The economies of each of the Seven Basin states rely on water reliability, and framing negotiations regarding the Colorado River as a fight for each states' future. These stakes make the negotiations of the utmost importance but have the added challenge of creating a false dichotomy where the success of one Basin is contingent on the failure of the other. This is not sustainable. Creative, forward-looking solutions must be considered to break away from this dynamic.

The Basin States are at a critical inflection point. One path leads to continued conflict. The other presents an opportunity to dream big and pursue creative solutions that allow all seven states to flourish. Following adoption of post-2026 guidelines, we strongly encourage discussions between the Basin States and the federal government to explore audacious opportunities like developing new water sources to support economies up and down the Colorado River. This is not an easy task and there are no simple solutions, but if we fail to find ways to make the impossible possible, growth in the West will forever be constrained. We owe it to future generations to continue the precedent setting decisions that lead to Hoover Dam, the 242-mile-long Colorado River Aqueduct, the 336-mile Central Arizona Project canal and other infrastructure investments that have made the West what it is today. Comparable visionary leadership and bold projects is needed today to build the foundation of what the West can become in the future and build a legacy that will last for the next century.

## **Comments on the Draft EIS**

First, in addition to receiving hydropower from the Lower Basin hydropower facilities, Arizona entities hold significant contracts of hydropower from the Upper Basin Colorado River Storage Project. Protecting hydropower generation in the Upper and Lower Basins from unnecessary reductions is critical to our state's interests. As such, we strongly support and concur with the comments filed by the Colorado River Energy Distributors Association regarding the Draft EIS.

The Organizations also raise the following additional concerns regarding the DEIS.

### **1. Inability to Assess Hydropower Impacts Due to Excessive Uncertainty**

**As drafted, the DEIS alternatives will make it almost impossible to project actual impacts to hydropower generation, because of the wide ranges of hydrology, water releases, and uncertainty with lake elevations.**

The Decision Making under Deep Uncertainty (DMDU) analysis framework is a new decision-making framework that may effectively capture the wide-ranging possibilities for future conditions on the Colorado River. The framework uses three lake elevation levels and 400 hydrology traces, resulting in 1,200 possible future scenarios.<sup>1</sup> The framework was used to develop the proposed alternatives, with each alternative including its own range of possible water releases. As an example, one alternative includes a water release range at Glen Canyon Dam as low as 4.7 MAF per year and as high as 12 MAF.

While we recognize that such a framework may be helpful in complying with National Environmental Policy Act requirements, significant uncertainty remains regarding the actual impacts of the alternatives and in selecting the preferred alternative. A 7.3 MAF range casts doubt on the validity of the analysis and creates significant uncertainty about the impact of the alternative on hydropower generation, given that the amount of water flowing through a turbine is directly correlated with the amount of hydropower generated.<sup>2</sup> As the DEIS itself states, stakeholders are effectively left to our "individual judgment" to assess the "likelihood of specific impacts."<sup>3</sup> This level of uncertainty materially limits the usefulness of the analysis for decision-makers and the public.

### **2. Absence of Rate and Market Impact Analyses**

**The DEIS does not include a rate impact analysis for the Lower Basin hydropower resources, nor does it provide market analysis for the Upper and Lower Basin hydropower resources, leaving the DEIS incomplete.**

While we recognize that the development of the DEIS has been a significant undertaking, not including a rate impact analysis for the Lower Basin hydropower resources or market analysis for Upper or Lower Basin hydropower resources renders the DEIS incomplete.<sup>4</sup> Consequently, without this analysis, it is difficult for those with an interest in hydropower to provide meaningful, informed comments.

In order for the administrative record to be complete, the DEIS should be supplemented with a comprehensive rate impact and market analysis. Ideally, the analyses should also include recommendations for rate mitigation tools and strategies to help maintain the affordability of the hydropower resource. Once the record has been supplemented, stakeholders should be afforded adequate time to review and provide comment.

### **3. Failure to Account for Infrastructure Constraints Prior to Minimum Power Pool**

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<sup>1</sup> Draft Environmental Impact Statement on the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead , Chapter 3 - Affected Environment and Environmental Consequences , Page 3-11.

<sup>2</sup> Page 3-161.

<sup>3</sup> Page 3-11.

<sup>4</sup> Page 3-169.

**The DEIS compared the alternatives to minimum power pool levels at Hoover and provided insufficient analysis of the known infrastructure constraints that would eliminate most of the value and output of the hydropower resource well before reaching minimum power pool.**

The Bureau used the minimum power pool lake elevation to evaluate a number of resources, which ranged from cultural sites to hydropower output. Such an undertaking was likely acceptable for all resources except for power generation, found in Section 3.15.<sup>5</sup> Hydropower is a core statutory purpose included in the enabling legislation to build the Lower and Upper Basin dams. The impacts to hydropower are not tangential, associated, or ancillary; they must be fundamental to making a decision about a preferred alternative. The analysis underlying Section 3.15 at Hoover is tied to a minimum power pool elevation of 950’.

In January 2025, hydropower customers learned at an Engineering and Operation Committee meeting that the remaining original turbines at Hoover Dam contained a design defect that prevented them from being operated when the lake elevation dropped below 1035’. Since then, considerable work has been undertaken to find a solution to the problem. Unfortunately, Hoover’s generation capacity is severely impaired once those turbines are no longer operable because of lake elevation. At elevations just above 1035’, the generation capacity is approximately 1304 MW. Once the lake elevation reaches 1035’, the generation capacity drops to approximately 382 MW, an over 70% reduction from the already diminished generation capacity. This would result in just 18% of the Hoover Dam’s generation capacity being available.

In addition to the power issues, there may be issues related to how and when water is passed through the dam, implicating a host of other concerns. This drop in generation capacity would be catastrophic for current contractors and would render the resource unaffordable. The DEIS attempts to describe this problem in Technical Appendix 15. However, the realities of this problem are not addressed in the impact analysis on the proposed alternatives in the DEIS. In addition to supplementing the hydropower rate and market analysis, more should have been done to evaluate the function equivalent to a new minimum power pool.

### **Conclusion**

In addition to the concerns raised regarding the Draft Environmental Impact Statement (DEIS), immediate action is needed to protect the infrastructure and the contractual obligations associated with hydropower resources, which may soon become scarce or prohibitively expensive. The prolonged drought has underscored the urgent need for targeted infrastructure investments to preserve and maximize power generation capabilities, maintain the affordability of hydropower, and ensure the continued operation of the reservoirs along the Colorado River.

The Bureau has received substantial financial resources to address the impacts of drought within the Colorado River Basin. So far, most of these funds have been allocated to water conservation efforts. However, the affordability of hydropower is emerging as a pressing issue. Hydropower customers bear the majority of the costs for constructing, maintaining, and operating the critical infrastructure needed to store and transport water along the Colorado River.

As this process advances and the Bureau approaches the issuance of a Record of Decision, there will be opportunities to strategically invest in this system to help maintain its viability. We urge the Bureau to take action and make informed decisions. Where necessary, we encourage collaboration with Congress to secure additional resources or authorities to ensure the long-term sustainability of the Colorado River system.

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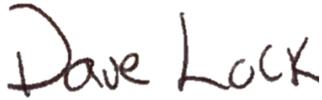
<sup>5</sup> Page 3-160.



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