

March 2, 2026

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Mark S. Sanchez

Website
www.abcwua.org

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

To Whom It May Concern:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) has completed review of the *Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead Draft Environmental Impact Statement (DEIS)* posted on January 16, 2026. The Water Authority appreciates the work that the U.S. Bureau of Reclamation (USBR) has invested in the DEIS, working to capture a range of alternatives for operating Lake Powell and Lake Mead during continued drought and decreased surface water supply.

As a preliminary matter, the Water Authority understands that USBR is continuing to work with the seven basin states to negotiate a consensus alternative for the operation of Lake Powell and Lake Mead. The Water Authority continues to advocate and support a seven-state solution for Post-2026 Operational Guidelines and prefers that a consensus alternative be analyzed in the Final EIS for selection as the preferred alternative.

With respect to the DEIS, one of the Water Authority's primary observations is that its resource analysis was limited to its geographic scope. While defining the geographic scope as the area below Lake Powell is appropriate, the impact analysis in the DEIS should not be so limited. It should include Upper Basin water service areas as well as Upper Basin reservoirs and tributaries to the Colorado River. Specifically, the DEIS impact analysis should include the Colorado River Storage Project (CRSP) upper initial units. Releases from the CRSP reservoirs are key to three of the five alternatives and by excluding these from the analysis could result in a biased assessment of contributions from these reservoirs. Additionally, the DEIS impact analysis should include the San Juan-Chama Project (SJCP), an important source of water to New Mexico. The Water Authority, along with the other 19 SJCP contractors, rely on the Colorado River to support over 1 million people. Further reductions in water supply for SJCP contractors, beyond the hydrologic shortages experienced year after year, would have an impact that is proportional to those experienced in the Lower Basin. The Water Authority requests that USBR consider a consistent, inclusive scoping of the DEIS analysis to have a balanced understanding of impacts to implementation of the five alternatives. Specifically, the Water Authority is requesting that the SJCP contractor water service areas be included in the resources analysis in the DEIS, along with important areas such as Navajo Reservoir, Heron Reservoir, and the Rio Chama.

Critically, impacts on economic and social conditions due to changes in agriculture and recreation were assessed for the Lower Basin states of California, Arizona, and Nevada but not expanded to include Upper Basin water users, like SJCP. However, agricultural

and recreational interests are also of critical concern for SJCP users. For example, SJCP water delivered to Heron Reservoir supports camping, boating, fishing, and swimming recreational activities, attracting over 150,000 visitors each year. If inflow of SJCP water to Heron Reservoir is reduced beyond what is already being experienced with hydrologic shortages, there will be impact to the recreational industries that rely on this reservoir. Additionally, the Water Authority in coordination with USBR, strategically releases SJCP water to support Rio Chama rafting flows; the ability to continue to support rafting on the Rio Chama is dependent on the quantity of SJCP water available. Expansion of the analysis to include Heron Reservoir and the Rio Chama, will allow the USBR to have a more complete understanding of the impacts of the alternatives.

Additionally, the DEIS analysis of economic matters is solely based on agricultural and recreational interests, and this appears too limited because it fails to address potential economic impacts to municipal and industrial (M&I) water users. The Water Authority requests that the evaluation of economic and social conditions be expanded to consider both agricultural and recreational interests, together with M&I for Upper Basin users such as the Water Authority.

Further, there is an apparent discrepancy between Maximum Operational Flexibility alternative and the other alternatives regarding contributions from the Upper Basin to a conservation pool in Lake Powell. Specifically, the Maximum Operational Flexibility alternative, targets an annual conservation volume of 200,000 acre-feet per year in the Upper Basin to a conservation pool in Lake Powell. To achieve this target volume, each Upper Basin state would need to implement water enforcement actions to satisfy their respective contributions. Effectively, this means that the Upper Basin water users will face shortages that are happening at the state level to meet conservation pool contribution requirements. These shortages will be on top of hydrologic shortages, further limiting available water supplies in regions that consistently have reduced water availability because of drought. Any alternatives that rely on additional, uncompensated reductions for water users in the Upper Basin may create untenable burdens for New Mexico water users. It may not be possible to meet the minimum conservation contributions in years of decreased hydrology, creating additional stress on the Upper Basin states and water users. The Water Authority requests that USBR consider consistent activities above Lake Powell for all alternatives in the DEIS.

The Water Authority understands that continued work is necessary to efficiently manage water resources, and to adapt water management to the reality of decreased supply. The Water Authority has been a leader in the Southwest through the implementation of a progressive water conservation program along with a 100-year water resource management strategy known as *Water 2120*, which has conservation as its cornerstone. The result has been a greater than 50% reduction in total gallons per capita per day (GPCD) – going from 250 in the mid-1990s to 124 in 2025 (Figure 1). This conservation program goes beyond traditional rebates for water efficient indoor appliances. It offers rebates that incentivize customers to increase outdoor water efficiency and to replace turf with desert-friendly landscapes. To date, Water Authority customers have replaced over 5.4 million square-feet of turf, which correlates to over 800 million gallons of water saved every year. Additionally, the Water Authority is a signatory to the 2022 Memorandum of Understanding committing to a 30% reduction in non-functional turf.

Water Authority customers can also attend free virtual webinars that provide valuable information on outdoor irrigation maintenance and desert-friendly landscaping tips. The webinars build on information available on the Water Authority's conservation website, www.505outside.com, which is the "one stop" website for information on landscape tips, plants, and a comprehensive irrigation guide. Customers can sign up for the monthly 505 Outside newsletter to receive news and tips throughout the year for increased water efficiency and reduced water use. Water Authority staff work closely with local landscape companies to educate and train them in the best practices for outdoor water efficiency and desert-friendly landscaping. These efforts also include identifying major water users in the service area for targeted outreach aimed at reducing water use. In 2025, the Water Authority distributed letters to the top 5% of residential water users in the service area which resulted in total water savings of 158 million gallons of water.

The *Water 2120* strategy also focuses on diversifying the Water Authority's supply portfolio in an effort to meet customer demand into the future. The Water Authority has identified a series of water security projects based on probable supply and demand scenarios developed through modeling a range of climate data, including: expansion of reuse, increased aquifer storage and recovery (ASR), and continued conjunctive management of surface water (SJCP) and groundwater. Based on these efforts, three new ASR wells are in design and when complete, they will increase the quantity of water stored locally by 8,400 acre-feet per year which is equal to roughly 10% of the Water Authority's annual demand. Expansion of ASR is integrated into the utility's Infrastructure Improvement Planning (IIP) as well as overall funding planning, demonstrating the Water Authority's commitment to increasing this supply source into the future.

The Water Authority also has an existing reuse system in the southern portion of its service area, which supplies an average of 2,500 acre-feet of reuse water for the irrigation of parks and golf courses each year. The Water Authority is in design to expand the southern reuse system with the addition of reuse distribution piping and pump stations for delivery of reuse water to a new development in southern Albuquerque. The Water Authority is currently in the design stage for an additional wastewater treatment plant that will provide another source of reuse water on the west side of Albuquerque. This project will expand reuse for turf irrigation across the western service area, allowing the utility to utilize reuse water for the irrigation of parks and golf courses in place of potable water. This will decrease the Water Authority's overall demand for SJCP surface water and groundwater during the summer months when demand is at its highest. These reuse projects are large infrastructure projects that make meaningful progress to increasing the reuse supply source and creating a resilient water supply for the greater Albuquerque Area and Bernalillo County.

The Water Authority, like many water users in the Upper Colorado River Basin, is familiar with the challenges of managing and operating with decreased surface water availability. Over the past 10 years, SJCP contractors received their full allocation of SJCP water a total of only four years (Figure 2). Just last year, the Water Authority and other SJCP contractors received only 39% of the total SJPC allocation because of reduced hydrology in the Upper San Juan River basin. This pattern of decreased SJPC supply because of hydrology represents a real, uncompensated shortage experienced each year and demonstrates that water users in New Mexico have already developed a strong culture of water conservation – learning manage with uncertainty and to meet and

adjust demand in response less water availability. The potential impacts to water users in New Mexico are important and should be incorporated in any decision for the operation of Lake Powell and Lake Mead moving forward. We look forward to continued partnership with USBR as we work together to create a plan for operating the Colorado River and supporting the many people that rely on it.

Sincerely,

A handwritten signature in black ink, appearing to be 'MS', written in a cursive style.

Mark Sanchez
Executive Director
Albuquerque Bernalillo County Water Utility Authority
PO Box 568
Albuquerque, NM 87102
(505) 289-3101

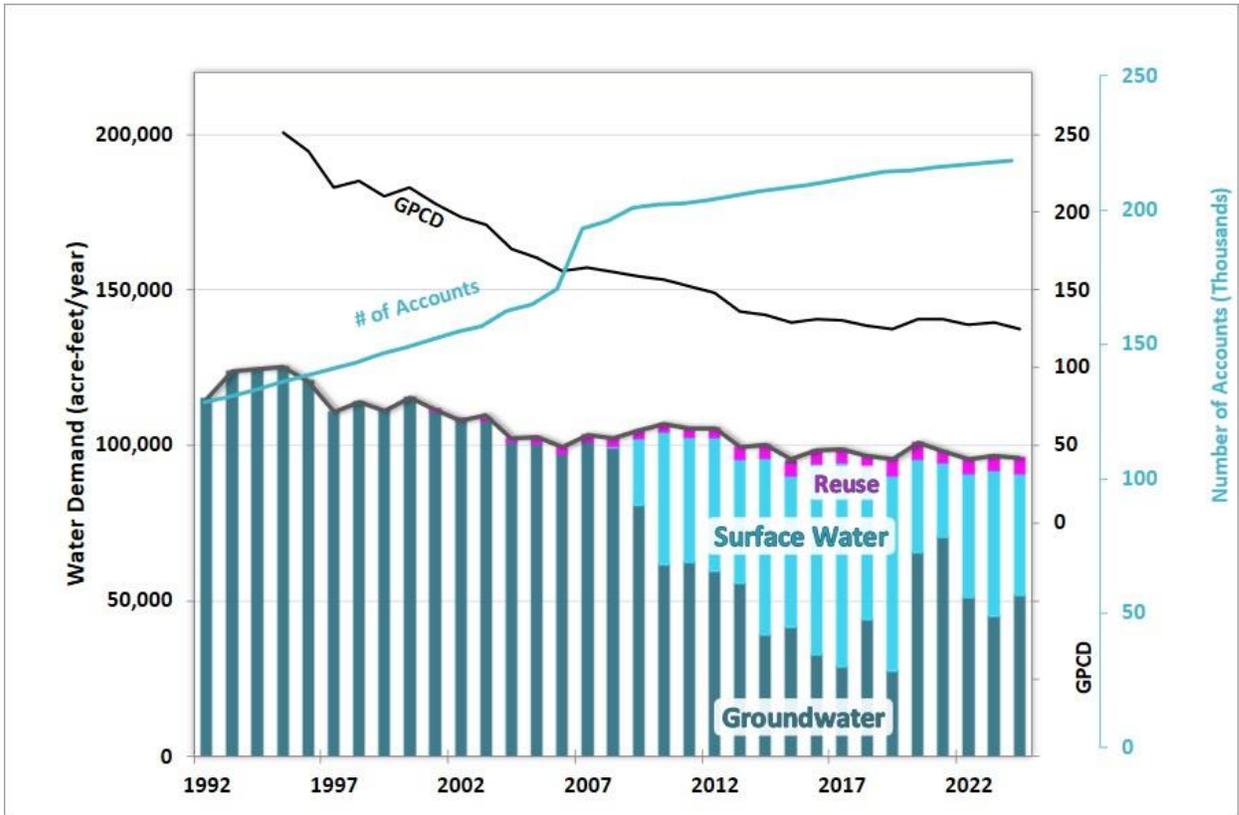


Figure 1 Water Authority Demand Reduction from 1992 to 2024

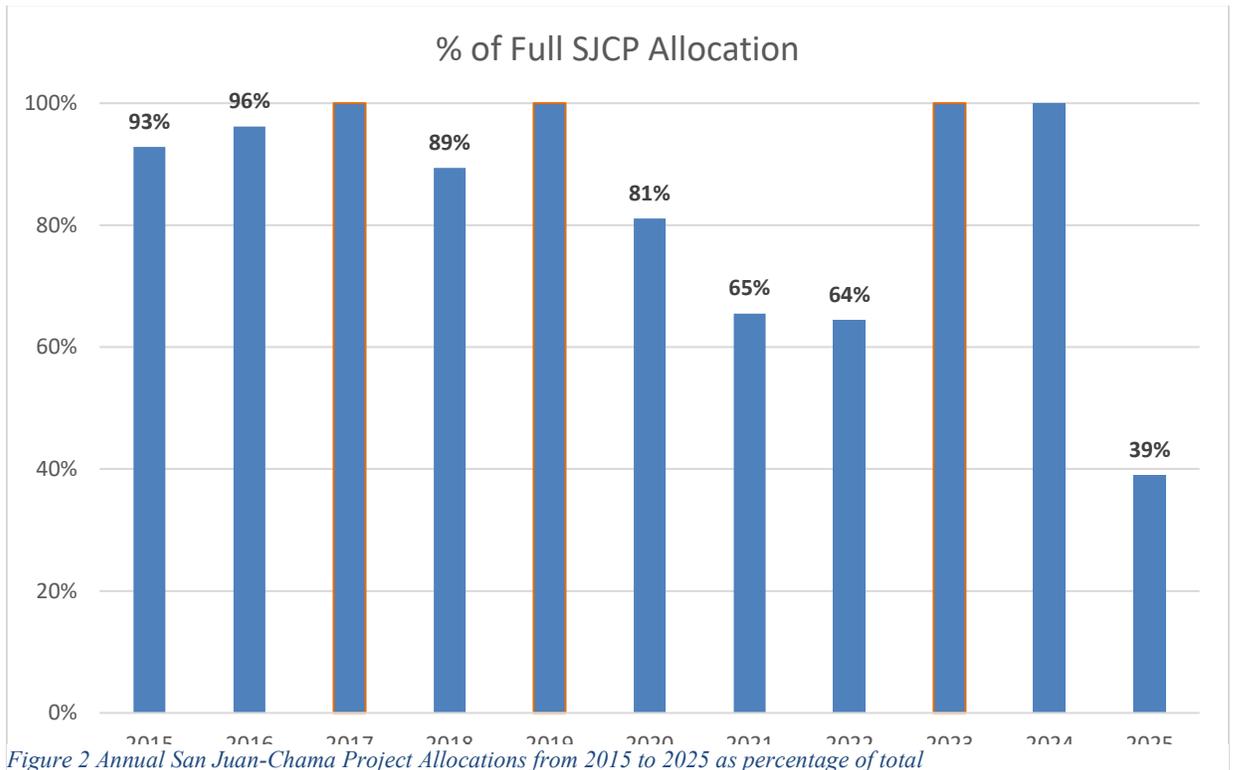


Figure 2 Annual San Juan-Chama Project Allocations from 2015 to 2025 as percentage of total