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February 18, 2026

U.S. Bureau of Reclamation
Lower Colorado Basin Region
Attn: BCOO-1000, Draft EIS
P.O. Box 61470
Boulder City, NV 89006

Dear Bureau of Reclamation,

On behalf of the City Council of the City of Bullhead City, I submit the following comments regarding the Post-2026 Colorado River Operations draft Environmental Impact Statement.

The City is a river-dependent community whose economy, quality of life, and identity are directly tied to stable and predictable Colorado River flows. Any long-term operational changes that reduce river levels or create significant variability in flows will have profound and lasting consequences for our residents, businesses and regional economy.

Recreation on the Colorado River is the foundation of the City's tourism industry and a primary economic driver for the tri-state area including Laughlin, Nevada, and the Fort Mojave Indian Tribe. Lower and inconsistent river flow regimes would significantly impact boating, fishing, and shoreline access, reduce visitation and diminish the recreational experience that attracts residents and visitors alike. Marinas, launch facilities, fishing areas and public riverfront access points could become less usable or unsafe, directly affecting the economic vitality of the community. Reduced recreation translates to fewer overnight stays, lower restaurant and retail activity, and declining revenues for local businesses that rely on river users. More importantly, uncertainty in daily flows leads to potential for fatal accidents on the river when users are not aware of fluctuating river levels.

The City is very aware of the need to conserve Colorado River water. Notably, the City has a model water conservation program and has virtually eliminated most non-functional turf in the community. Water will flow to Mexico and the rest of the Southwest through Davis Dam. However, the EIS does not address the time of day nor manner in which the water flows through Davis Dam. This is a major concern for the City. The City is, and has been, concerned about potential operational changes tied to hydropower and renewable energy management, including solar integration and power system balancing. If future operations prioritize energy production or grid demands in ways that significantly alter river flows, the impacts to downstream communities like the City must be fully evaluated and mitigated. Energy policy should not unintentionally shift environmental, economic and safety burdens onto river-dependent communities. Article IV (b) of the Colorado River documents (Colorado River Compact)

authorizes the impounding and use of water for generation of electric power, subject to the provisions of the compact, but stipulates that such impounding and use shall be “subservient to the use and consumption of such water for agricultural and domestic purposes and shall not interfere with or prevent use for such dominant purposes.”

The draft EIS analyzes river flow changes in the Lower Colorado River reaches, including the segment from Davis Dam to Lake Havasu, under different operational alternatives. The document states flow levels in this reach vary depending on hydrologic conditions and reservoir releases. The document states river flows “mirror trends for releases from Davis Dam” and decline as drought conditions worsen. This confirms Davis Dam operations are part of the modeling and impact analysis affecting the City.

The draft EIS alternatives also raise serious concerns for residents who live along the river corridor. Many homes are dependent on stable shoreline conditions for access, safety and property protection. Fluctuating or reduced flows could lead to erosion, exposed hazards, decreased navigability, and diminished property values. Riverfront neighborhoods represent a significant portion of the community’s housing base and tax structure, and instability in river operations would create both financial and quality-of-life impacts for these residents.

Fishing is another essential component of the City’s recreational economy and cultural identity. Changes in water levels, temperature, and flow patterns could affect fish habitat, spawning conditions, and overall fish health. This would not only impact local anglers and tournaments, but also small businesses such as bait shops, guides, and outfitters that depend on a healthy river ecosystem to remain viable. Small businesses throughout the City would experience ripple effects from reduced river activity. Hospitality, retail, watercraft services, and recreation-based enterprises rely on consistent river access and predictable visitation patterns. Prolonged low-flow conditions or operational variability will result in job losses, reduced investment and long-term economic contraction.

Public safety is also a critical concern. Lower flows and fluctuating releases can create hazardous navigation conditions for boaters, expose underwater obstacles and limit safe emergency response access along the river corridor.

The City’s first responders and public safety personnel depend on predictable river conditions to conduct rescues, patrol waterways and support recreational users. Any operational strategy must prioritize safety and minimize abrupt or extreme flow variations.

The City is directly affected by operational decisions at Davis Dam, as releases from the dam control river flows through the community and along the Lower Colorado River corridor. The draft EIS appropriately recognizes Davis Dam as a critical component of the regional hydropower system; however, the City is concerned that the document primarily evaluates the facility from an infrastructure and energy production perspective and does not fully address the downstream impacts associated with flow variability. Changes in release volumes, timing, or ramping associated with operational or hydropower considerations translate immediately into on-the-ground impacts for City residents, businesses, public safety personnel and visitors.

Flow stability below Davis Dam is essential to maintaining safe and reliable river conditions in the City. Fluctuations in releases can create hazardous boating conditions, expose underwater obstacles, and alter currents and depths in ways that increase risk to residents and visitors. Emergency response, law enforcement patrols, and water rescue operations depend on

predictable river conditions. The City encourages the Bureau of Reclamation to include a downstream flow stability objective that prioritizes gradual operational changes, minimizes rapid ramping, and considers safety impacts on river users and shoreline communities.

Based on visitation estimates of approximately 1.5 million annual visitors and average spending of roughly \$100 per person per trip, river-related tourism generates an estimated \$150 million annually in direct spending in the City. When accounting for secondary and induced economic activity, the total regional economic impact is estimated to range between \$210 million and \$255 million per year. These expenditures support local businesses, employment, and municipal revenues tied to recreation, hospitality, and tourism services dependent on the Colorado River. Because this economic activity is directly tied to river recreation, boating access, fishing and shoreline usability, reductions in river flows or increased variability in releases from Davis Dam would pose significant risks to the local economy. Even modest declines in visitation would translate into measurable losses in business revenue, employment and tax generation within the community.

The City also requests that the Final EIS include a more robust analysis of recreation and tourism impacts associated with Davis Dam operations. The Colorado River is the primary economic engine for the City. Variable flows or prolonged low-flow conditions can reduce access to launch ramps, diminish fishing opportunities, affect marina operations, hurt businesses and discourage visitation. These impacts extend beyond recreation alone and directly influence employment, tax revenue, and long-term economic development in the region.

The City respectfully requests that the Bureau of Reclamation give strong consideration to downstream community impacts when selecting a preferred alternative. Maintaining stable and predictable river flows during day-time hours (7 a.m. – 6 p.m.) must remain a central objective to protect recreation, economic activity, residential stability, environmental health and public safety. The City also requests continued engagement with local governments along the Lower Colorado River as this process advances.

The City has enjoyed a positive long-term relationship with the Bureau with monthly meetings discussing river levels south of Davis Dam. These continued meetings are imperative and must continue especially considering the impacts outlined in the EIS. Davis Dam operations must include explicit flow-stability protections for downstream river communities, including the City, and evaluate the economic, safety and recreational impacts of variable releases associated with hydropower operations.

The Colorado River is not only a water supply system - it is the heart of the City. Decisions made through this process will shape the future of our economy for decades. We appreciate the opportunity to provide input and look forward to continued collaboration.

Sincerely,



Rodney Head
Mayor
City of Bullhead City, Arizona