



**Michael J. Garcia, Mayor**

**Date:** February 25, 2026

**To:** Bureau of Reclamation (BOR), Attn: BCOO-1000, P.O. Box 61470, Boulder City, NV 89006

**Via Email:** [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

**Subject:** Comments on the Draft EIS for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (DEIS)

Dear BOR DEIS Program Managers,

On behalf of the City of Santa Fe, New Mexico (City), I respectfully submit these comments on the above referenced Draft EIS (DEIS) for Post-2026 Operational Guidelines for Lake Powell and Lake Mead. The City is a contractor with the BOR managed San Juan Chama (SJC) Project, which was authorized by Public Law 87-483. The SJC project consists of 3 diversion structures and tunnels on tributaries of the San Juan River within Colorado, that deliver water to Heron Reservoir in the Rio Grande Basin in New Mexico. The City is directly impacted by reduced flows on the Colorado River, as the SJC Project has experienced 7 years of reduced deliveries in the past 11 years, with an average overall reduction of 15% during that time. The City has partnered with BOR on the Santa Fe Basin Study (2015), Santa Fe Reuse Feasibility Study (2017) and is collaborating on a Title XVI funded Santa Fe SJC Reuse Project (2020-2026), all designed to manage a dwindling water supply in face of climate change.

The City is aggressively pursuing water reuse and conservation measures, as evident by a GPCD below 90. The City is appreciative of BOR's efforts to develop a new Post-2026 Colorado River operations framework and offers the following comments on the DEIS. The DEIS will inform strategies that directly affect our community as the City currently utilizes Colorado River for more than half of our water supply.

## City Council

**Alma G. Castro, District 1**  
**Patricia Feghali, District 1**

**Elizabeth "Liz" Barrett, District 2**  
**Paul C. Bustamante, District 2**

**Lee Garcia, Mayor Pro Tem, District 3**  
**Pilar F.H. Faulkner, District 3**

**Jamie Cassutt, District 4**  
**Amanda Chavez, District 4**

## **Hydrologic Variability and Climate Change Require a Flexible Framework**

- Santa Fe and other New Mexico water users (e.g. San Juan Chama Project, Navajo Nation, San Juan River irrigators) are frequently experiencing immediate and uncompensated reductions in supply during dry years. The Upper Basin does not have the benefit of 2 large main stem reservoirs, and its available water supply is vulnerable to low flow river conditions. Alternatives need to incorporate flexible, natural hydrology-based flow regimes and reservoir operations that factor in climate change conditions, continued aridification, and naturally occurring reduced inflows to Lake Powell.
- The DEIS should address uncertainty and incorporate sensitivity analyses showing how the alternatives perform under a range of hydrologic futures, with emphasis on using the drier hydrologic conditions that are trending towards minimum probable.

## **System-Wide Accounting for Losses:**

- The City appreciates the DEIS alternatives recognize the evaporation and transit losses below Lees Ferry, which are estimated to be up to 1.5 million acre-feet annually. Rectifying the structural deficit is paramount for striking an operational balance under drier conditions

## **Lake Powell Operations**

- Alternatives that incorporate operational flexibility and permit the Upper Basin to refill Lake Powell during wet years need to be evaluated to ensure storage levels do not decline to the point where hydropower generation and dam safety are undermined. Independent operation at Powell, instead of equalization operations of both Powell and Mead provide the most operational flexibility and benefit.

Thank you for the opportunity to comment on the DEIS. Santa Fe is committed to working with all the Colorado River stakeholders and is hopeful that a 7-state consensus can be reached. In the absence of an agreement, Reclamation should select an alternative that equitably distributes risks without penalizing the Upper Basin for climate-driven shortages.

Sincerely Yours,

Brian Moya

*BRIAN MOYA*

Interim City Manager, [bjmoya@santafenm.gov](mailto:bjmoya@santafenm.gov), 505-955-6848