



# COALITION OF LOCAL GOVERNMENTS

1689 COUNTY ROAD 263  
FORT BRIDGER, WY 82933

COUNTY COMMISSIONS FOR LINCOLN, SWEETWATER, AND UINTA - WYOMING, AND DAGGETT- UTAH;  
AND CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, STAR VALLEY, SWEETWATER,  
AND UINTA - WYOMING

March 2, 2026

VIA EMAIL: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Carly Jerla  
Post-2026 Program Project Lead  
Bureau of Reclamation  
Attn: BCOO-1000  
P.O. Box 61470  
Boulder City, NV 89006

Re: Comments on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – Draft Environmental Impact Statement

Dear Ms. Jerla,

The Coalition of Local Governments (Coalition) submits the following comments on the Bureau of Reclamation's (BOR) Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead draft environmental impact statement (DEIS). The Upper Green River Basin in southwestern Wyoming contains one of the larger tributaries, the Green River, to the Colorado River. The Green River helps to ensure that sufficient flow exists to meet the Upper Basin States' requirements under the Colorado River Compact. This river system is also essential for agricultural, industrial, municipal, and recreational activities that occur throughout western Wyoming. But as the DEIS recognizes, the Colorado River Basin has experienced one of the worst multi-decade droughts since 2000 and average annual flows and storages in both Lake Powell and Lake Mead have continued to decline. DEIS at 1-2. This year's winter precipitation will not improve conditions with both Colorado and Utah experiencing their lowest snowpack on record. It is imperative that actions are taken to address these drought conditions and that the seven Colorado River Basin States come to an agreement to protect this important water resource, and in doing so protect each state's water rights under the Compact and other legislation.

## **I. Statement of Interest**

The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming and Utah to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§ 11-16-103, 11-16-122, 18-5-201; Utah Code § 17-27a-102(1)(a). Coalition members include Lincoln County, Sweetwater County, Uinta County, Daggett County, Lincoln Conservation District, Sweetwater County Conservation District, Uinta County Conservation

District, Little Snake River Conservation District, and Star Valley Conservation District. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotion and support of habitat improvement, the support and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

The Coalition members have a long history of working alongside both state and federal agencies on proposed projects, plan revisions, and rule revisions impacting state and federal resources and lands. Both the Counties and the Districts have authority to protect the public health and welfare of Wyoming and Utah citizens while promoting and protecting public lands and water resources. Wyo. Stat. §§ 11-16-122, 18-5-208; Utah Code § 17-27a-102(1)(a). The Districts have statutory authority to develop and implement comprehensive resource use and management plans for range improvement and stabilization, conservation of soil, water and vegetative resources, control and prevention of soil erosion, and for flood prevention. Wyo. Stat. § 11-16-122(xvi). The Districts' jurisdiction includes matters pertaining to the acquisition, construction, operation or administration of any land utilization, soil conservation, erosion control, erosion prevention, flood prevention projects, conservation of water, water utilization, disposal of water in watershed areas, and other water projects. Wyo. Stat. § 11-16-122(xix). In carrying out this statutory authority, the Districts are working "to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state." Wyo. Stat. § 11-16-103(b). The Districts also work cooperatively with federal agencies in the development and implementation of federal land use plans to ensure consistency with local land and resource plans. Wyo. Stat. § 11-16-122(viii).

By statute, the Wyoming Counties are "deemed to have special expertise on all subject matters for which it has statutory responsibility, including but not limited to, all subject matters directly or indirectly related to the health, safety, welfare, custom, culture and socio-economic viability of a county." Wyo. Stat. Ann. § 18-5-208. As such, the Counties "may regulate and restrict . . . the use, condition of use or occupancy of lands for residence, recreation, agriculture, industry, commerce, public use and other purposes in the unincorporated area of the county." Wyo. Stat. Ann. § 18-5-201. Daggett County also possesses the general land use authority to protect the tax base, foster the state's agricultural and other industries, facilitate growth, and provide for the health, safety, and welfare of its citizens. Utah Code § 17-27a-102(1)(a)(i)-(ii), (iv), (vi).

## **II. Protection of Upper Basin States' Water Rights**

The Colorado River Compact apportioned to the Lower Basin and Upper Basin states the beneficial consumptive use of 7.5-million-acre feet of water per year. The Upper Basin state apportionments, after deducting up to 50,000 acre-feet per year for Arizona is: 51.75 percent to Colorado, 11.25 percent to New Mexico, 23 percent to Utah, and 14 percent to Wyoming. *See*

Upper Colorado River Basin Compact of 1948. The Upper Basin states, including Wyoming, have not fully developed their apportionments and have consistently used 3-4 million acre feet less than their apportionment under the Compacts. The Upper Basin States adapt their uses every year based on the snowpack, hydrology and overall available supplies. They are used to adjusting to the available water supplies and these past and current efforts should not be ignored in developing the Post-2026 operations for Lake Powell and Lake Mead.

The Upper Basin States have also released water from their reservoirs, including the Flaming Gorge Reservoir, in response to recent drought years and to keep the surface of Lake Powell above 3,525 feet. Congressional Research Service, *Management of the Colorado River: Water Allocations, Drought, and the Federal Role*, at 12, 22 (Nov. 19, 2025); see DEIS at 1-30. It is likely that another significant drawdown from the Flaming Gorge Reservoir will occur this spring due to the intense snow drought that has occurred this winter across much of the seven-state basin region. While Wyoming's current snowpack in the Upper Green River Basin is near normal levels, Utah and Colorado are experiencing their lowest snowpack on record in the Colorado River headwaters. Additional releases are almost guaranteed to ensure operational water levels at Lake Powell are maintained.

The State of Wyoming has also been involved in key initiatives to implement water efficiency and conservation projects, including agricultural infrastructure upgrades and voluntary, compensated water reductions. This includes the System Conservation Pilot Program that helps develop, fund, and implement new water conservation, recycling, and water efficiency projects; the Wyoming Upper Colorado River Basin Efficiency and Conservation projects that help implement practices such as converting open canals to pipe, improving diversions, or lining conveyances on a wide scale to improve efficiency and provide drought resiliency; and enhancing water infrastructure and monitoring to provide valuable data to assist in improving water use accountability and planning. Finally, proposed legislation in Senate File 84 would provide for a statutory water conservation strategy in Wyoming that would allow water users to voluntarily use less water without losing their appropriation rights.

Wyoming has long been proactive at managing its water resources consistent with the hydrology and available supplies. The State has consistently used less water than appropriated to it under the Compacts. The Coalition, therefore, objects to any alternative that would place mandatory reductions for Wyoming and other Upper Basin States. The Coalition is also concerned with those alternatives that presume annual conservation contributions from the Upper Basin States between 200,000 acre-feet and 350,000 acre-feet. DEIS at ES-12 – ES-2-23, 2-29 – 2-30, 2-35. It is unclear whether this level of conservation is even achievable by the Upper Basin and it is not clear whether the Bureau of Reclamation is going to require mandatory conservation efforts to reach these volumes. The Coalition continues to emphasize the importance of voluntary conservation and responding to actual hydrology.

### **III. DEIS Should Address the Proposed Alternatives' Potential Impact to Upper Basin States**

The DEIS proposed alternatives include activities that would occur above Lake Powell in the Upper Basin States, including releases from Colorado River Storage Project (“CRSP”) Upper Initial Units, like the Flaming Gorge Reservoir, and Upper Basin conservation efforts that would contribute to the Lake Powell conservation pool. DEIS at ES-11 – ES-14. However, the DEIS does not address any potential impacts to Upper Basin States as a result of releases from their reservoirs and/or conservation within their respective states. *See* DEIS at ES-6 – ES-7, 3-2. The Coalition questions whether exclusion of any discussion of potential impacts to Upper Basin States is appropriate. While the Coalition can appreciate limiting the geographical scope of the analysis, there are actions considered under the alternatives that would impact the available water in the Upper Basin States.

The DEIS mentions the Records of Decision associated with the operations of the CRSP Upper Initial Units. *See* DEIS at 3-2. At the very least, the DEIS should tier to these previous environmental assessments and incorporate the past analysis when discussing the impacts from proposed alternatives that rely upon releases from the CRSP Upper Initial Units, including the Flaming Gorge Reservoir. *See* 516 DM 1, Section 3.2 (Feb. 2026). When additional releases are made from the Flaming Gorge Reservoir, then this brings the Reservoir water levels down and can impact the surrounding ecosystem, recreational activities, the power plant, and other uses. The Flaming Gorge Reservoir has historically been able to recover after emergency releases, but there is still a concern that if/when releases become more frequent due to drought the Reservoir would not have the ability to recover. It is for this reason that the Coalition encourages the BOR to address potential impacts from the proposed releases from the CRSP Upper Initial Units in this DEIS or, at the least, incorporate previous environmental analysis.

In addition, the BOR should provide some discussion about how annual conservation of water in the Upper Basin States at levels ranging from 200,000 acre-feet to 350,000 acre-feet will impact resources and uses in the Upper Basin States. While specific impacts may not be known at this time, the DEIS could at least provide general discussion about how conservation at these levels may impact the river ecosystems and the agriculture, municipalities, and industries in Upper Basin States that rely upon the Colorado River Basin and its tributaries. The BOR must also clarify under the proposed alternatives whether it is assuming mandatory conservation efforts that reach the specifically stated acre-feet level in the Upper Basin States or whether it is assuming that voluntary conservation efforts will reach these levels.

The Coalition appreciates the opportunity to comment on the DEIS for the Post-2026 Colorado River Basin operations of Lake Powell and Lake Mead. The continued coordination and collaboration among all seven Basin States, BOR, the Tribes, water users, and other stakeholders is essential for any of the proposed alternatives to be successful and ensure that all existing water rights on the Colorado River Basin system are protected.

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Sincerely,

A handwritten signature in cursive script that reads "Eric South".

Eric South, Chairman  
Coalition of Local Governments