Dolores Water Conservancy District

60 S. Cactus St. P.O. Box 1150 Cortez, CO 81321
Phone: 970-565-7562 Fax: 970-565-0870
Email: dwcd@doloreswater.com

March 2, 2026

United States Department of the Interior
Bureau of Reclamation
Upper and Lower Colorado Regions
Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006
Email: crbpost2026@usbr.gov

Re: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

I applaud Reclamation's extensive efforts producing the draft EIS analyzing such a complicated and impactful system. Twenty-five years of persistent drought have left us all between the proverbial rock and a hard place. Given today's conditions I offer the following comments on the Draft EIS for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

Upper Basin (UB) Hydrologic Shortage: The aforementioned drought has primarily affected the Upper Basin states until the 2022 Lower Basin (LB) shortage declaration under the 2007 Interim Guidelines. The UB annual consumptive use variability demonstrates water use cuts on a regular basis primarily affecting agriculture and leaving many acres fallowed. Here in southwest Colorado the Dolores Project has experienced nine shortage years since 2000, the worst providing less than a 10% project supply at 1.7 inches per allocated acre. Many of those fallowed acres remain idled as a full water supply only returned in 2023 for two years before dropping once again into shortage again in 2025, with 2026 projecting more water cuts. As negotiated and allowed the LB continued to draw down Powell to stave off their own cuts. Now there is no buffer left to protect the LB from living within the supply available from the Colorado River. Though drawing down Powell towards power pool is expected, at that point releases must remain within the production of the river. Past additional Powell releases have not met the expected LROC 602(a) pool requirements.

Structural Deficit: System losses (evaporation, seepage and unused orders) in the LB have historically been covered by additional releases from Powell. The Colorado River does not currently provide such excess. Here in the UB actual system losses directly affect water available for use and are accounted for as actual use. When UB rivers and reservoirs run low, there is no way to release additional supply from the depleted snowpack.

Upper Basin Conservation Contributions: Several proposed alternatives from the Draft EIS use 200,000 – 500,000 AF infusions from UB water conservation. Given past experience running UB SCPP projects for several years, there is nowhere near those projected water savings available to produce the projected conservation targets. There is also no current legal basis to prohibit legal diversions beyond what mother nature has imposed on all UB pre & post 1929 compact rights. More realistic UB water conservation ranges should be analyzed.

UB Impacts Analysis: The Draft EIS analyzes the operations of Powell & Mead showing substantial impacts to the Lower Basin. The Draft EIS points to operations of UB CRSP units without any review of the likely impacts. This lack of potential impact analysis likewise extends to any additional UB water conservation contributions.

Uses By Basin: LB recent use exceeds the natural supply and lessening LB uses provide the necessary means for safely operating Powell and Mead. UB variable annual consumptive uses are subject to natural supplies versus the uniform UB depletion schedules used in the Draft EIS. Likewise, there are different authorities, with Interior acting as the water master for the LB while UB pre and post compact legal diversions remain subject to physical water supply availability under individual state prior appropriation.

Summary: Given concerns around long-term Powell releases through the lower elevation river outlet works, it would be prudent to revert Powell operations to run of the river until such natural supplies from the snowpack and resulting spring runoff return sufficient inflow to once again target LROC objective releases of 8.23 MAF. Given your analysis in Appendix J on 602(a) storage, we have surpassed the lower limits that can provide certainty to releases supplying Lake Mead.

This should lead to utilizing protective actions for Powell from the Enhanced Coordination and Maximum Operational Flexibility alternatives. These alternatives place significant cuts on LB uses with corresponding impacts. Though understandably tough decisions, they provide the only way to successfully operate Powell and Mead to fulfill the Draft EIS Purpose and Need.

Reclamation should keep operations short term with the ability to adjust to current conditions on an annual basis protective of the necessary 602(a) pool.

Sincerely,

Kenneth W. Curtis III
DWCD General Manager