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March 2, 2026

Bureau of Reclamation
Attention BC00-1000
P.O. Box 61470
Boulder City, NV 89006

VIA ELECTONIC MAIL
crbpost2026@usbr.gov

RE: Comments on the Draft Environmental Impact Statement for Colorado River Post-2026 Operations

Dear Commissioner Cameron,

As General Manager of the Jordan Valley Water Conservancy District (“JVWCD”), I write to express our gratitude for the extensive effort and expertise expended on developing the Draft Environmental Impact Statement (“DEIS”) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead and for the opportunity to comment on it. Primarily, we state our support for the comment letters submitted by the Colorado River Authority of Utah (“CRAU”), Upper Colorado River Commission (“UCRC”), Provo River Water Users Associations (“PRWUA”), and Central Utah Water Conservancy District (“CUWCD”). We also note our appreciation for the challenging conditions, timeframe, and complexities in creating a DEIS, while stating our displeasure at the tight, forty-five-day window to review and respond to such technically dense and extensive material on an issue of such importance. Consequently, we reserve the right to supplement our comments in the future as needed.

JVWCD provides drinking water to businesses, institutions, and approximately 800,000 residents in some of the most densely populated and fastest growing areas of our state. JVWCD was created in 1951 to provide regional water solutions to cities and improvement districts within Salt Lake County whose growth was exceeding the capacity of local water supplies. To meet growing water demands, JVWCD became the first contract holder on the Central Utah Project (“CUP”) and remains the largest CUP contract holder today. As the Commissioner knows, the CUP is reliant in turn upon the Colorado River as an authorized participating project in the Colorado River Storage Project Act of 1956 (70 Stat. 105). JVWCD is also the operating entity for Bureau of Reclamation’s (“Reclamation”) Jordan Aqueduct System, which relies on the Colorado River water through those CUP contracts to meet Salt Lake County water demands. JVWCD also owns shares in PRWUA, which provides Colorado River water through the Provo River Project (“PRP”). Through the combination of our PRWUA shares and CUP contracts, approximately 70,000 acre-feet per year of the 110,000 acre-feet per year we deliver to our customers is dependent on Colorado River to Great Basin trans basin water. Our commitment and interest in ensuring a sustainable, resilient, transparent, safe, and unifying path forward for Colorado River users throughout the Basin runs deep: it is core to our values and to our future.

We have witnessed CUWCD’s commitment to sustainability as well and appreciate its leadership through the Water Management Improvement Plan and conservation generally. JVWCD voluntarily participates

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in CUWCD's successful June Sucker Program by deferring portions of its CUP contract water to CUWCD at the expense of utilizing other more costly sources. JWCD has also partnered with CUWCD in pioneering efforts of conservation, including extensive incentive programs, development of a Utah specific design approach for water efficient landscapes called [Localscapes](#), promulgation of water efficiency standards, and supporting legislation and local ordinances that codify conservation in a way that ensures our community is an active participant and leader in responsible, water wise efforts. The result is that (1) JWCD has always exceeded the progressive conservation goals CUWCD required in the CUP contracts and is currently conserving more than 12% beyond those requirements, and (2) Salt Lake County's consumptive use rate over the last three years has averaged 109 gallons per capita per day, contrary to much higher usage rates that others with competing interests in Colorado River water have repeatedly stated Utahns use.

That said, JWCD shares the concerns of CUWCD that unspecified actions and conservation in Upper Division States are assumed in the DEIS. We join in the concerns of improper geographic assumptions that the Secretary of the Interior can act in the Upper Division States, despite the absence of authority to compel operational decisions here. Congress must act before any modification to the requirements of the 1922 and 1948 Compacts can be applied to the Upper Division. The DEIS should acknowledge the need for congressional directives and perform the environmental analysis for any alternatives where the Secretary would act under those directives in Upper Division States. Moreover, we share in PRWUA's concerns that some of the alternatives could be interpreted to override the State of Utah's authority to administer any mandated reductions to Utah's apportionment of Colorado River water. Utah Division of Water Rights and CRAU have responded effectively when coordinated actions from Utah water users have been needed within Utah's apportionment, and their authority to do so should not be superseded.

We concur in CUWCD's assessment of Lower Division States' over-use of water, unsustainable drawdown of federal storage, and that the 2003 Quantitative Settlement Agreement was an overdue correction to begin returning toward some semblance of fairness as required by the Compacts. In the absence of a Basin States Agreement, there is greater need for reform from the Lower Division States. That assessment is particularly true when the Secretary's improper interpretation of the 2006 Decree in *Arizona v. California* allows Lower Division States, but not Upper ones, to avoid deductions for evaporation and system losses.

The DEIS fails to adequately acknowledge that the PRP and CUP are serving hardened municipal and industrial demands. Through payments of assessments levied by PRWUA, JWCD has contributed significantly to completing the repayment obligations for the PRP. Similarly, our contract payments to CUWCD are helping satisfy CUP repayment obligations. The cities and improvement districts we serve are meeting these significant financial obligations with the trust that these projects will continue to meet their water demands. For more than three decades, JWCD planned to develop new supply within the Great Basin to decrease dependence on Colorado River water. However, the long-term decline of Great Salt Lake to the point of crisis has made development of any new supply within the Great Basin improbable. JWCD customers are more reliant than ever on CUP and PRP water to continue meeting demands. By

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JORDAN VALLEY WATER
CONSERVANCY DISTRICT

limiting the Utah analysis area to Garfield, Kane, and San Juan counties, the DEIS fails to account for the significant socioeconomic impacts within our service area and that of our neighboring water providers along the Wasatch Front that also rely on CUP and PRP water. Because the Upper Division States have never consumed their full apportionment of Colorado River water and have regularly made cuts to water deliveries as the hydrologic yield of drought cycles have required them, we reiterate CUWCD's assertion that if conservation measures are taken by the Upper Division States, then that water should be saved and reserved for resiliency of the projects that have been developed in those states.

Finally, we see a critical failure of the DEIS in its omission of a preferred alternative, perhaps contributing to the commissioners of the seven states within the Basin not taking the threat of Federal Action seriously to this point, and thus missing negotiating deadlines. The DEIS suggests that a preferred alternative will be identified in a Final Environmental Impact Statement, with the implication that the preferred alternative may be a series of options selected and bundled from various operational elements found throughout the other alternatives in the DEIS. Such an approach would not be fully studied, could have environmental impacts that are not captured by the DEIS, and will require additional rounds of public comment and new analysis by Reclamation in the interests of fairness and due process.

In short, we have grave reservations regarding the current DEIS; echo those well-reasoned and researched concerns articulated by CUWCD, PRWUA, CRAU, and UCRC; and look forward to engaging further in a refined approach from Reclamation with what we hope will be a process allowing greater input and more clarity on the specifics of a federally preferred path forward that respects existing legal limits and addresses inequalities and errors that have crept into the management of the Colorado River over the decades. Our shared goal, with all states and partners along the Colorado River, is a sustainable, resilient system into the future, and to that extent we recognize the work that remains to be done.

Sincerely,

A handwritten signature in blue ink that reads "Jacob C. Young".

Jacob C. Young
General Manager
Jordan Valley Water Conservancy District