



February 12, 2026

Bureau of Reclamation  
Attn: BCOO-1000  
P.O. Box 61470  
Boulder City, NV 89006

**Subject:** Comments on Draft Environmental Impact Statement – Post-2026 Guidelines and Strategies for Lake Powell and Lake Mead

Metropolitan Domestic Water Improvement District (Metro Water District) respectfully submits the following comments on the Draft Environmental Impact Statement (DEIS) for the Post-2026 Guidelines and Strategies for Lake Powell and Lake Mead.

Since 2019, Metro Water District has actively participated in system conservation programs to support the State of Arizona's compliance with mandatory reductions under the Drought Contingency Plan (DCP). Through these efforts, Metro Water District has dedicated 26% of its Central Arizona Project (CAP) allocation from 2019–2022 and 37% from 2023–2026 to system conservation. These actions demonstrate the District's good-faith commitment to stabilizing the Colorado River System and protecting critical reservoir elevations.

Therefore, Metro Water District has significant concerns with the alternatives presented in the DEIS, as outlined below:

- The alternatives evaluated in the DEIS fail to adequately consider the legal framework established by the 1922 Colorado River Compact, including Compact compliance requirements.
- The DEIS alternatives do not address the legal obligations associated with the authorization, construction, and operation of the Upper Initial Unit reservoirs, which were designed in part to meet delivery obligations to the Lower Basin.
- All alternatives, other than No Action and Basic Coordination, require agreement by the Basin States to accept reductions or operational changes. At present, no Basin-wide agreement exists, rendering these alternatives effectively unimplementable.
- Under the 1922 Colorado River Compact and subsequent legal decisions, Arizona and the CAP canal are not a junior priority to the Upper Basin. The proposed alternatives impose disproportionate reductions on Arizona and CAP, contrary to established legal protections.
- The DEIS does not adequately consider or evaluate the social, industrial, and agricultural impacts of the proposed alternatives, particularly on Arizona communities and water users.

- None of the alternatives include measurable and mandatory reductions in water use by the Upper Basin States.
- Under all proposed alternatives, there is a substantial probability that Lake Mead could reach dead pool conditions, resulting in the complete loss of water deliveries to the Lower Basin States.

Metro Water District urges the Bureau of Reclamation to develop a preferred alternative that fully considers the severe and disproportionate impacts to Arizona and Metro Water District resulting from the proposed DEIS alternatives. After contributing to system conservation efforts for more than eight years, it is deeply concerning to see alternatives advanced that could effectively eliminate Colorado River water supplies relied upon by our customers and the region we serve while not imposing even one gallon of mandatory reductions to the Upper Basin states.

Metro Water District is absolutely willing to continue being part of the solution in addressing the ongoing drought and supply/demand imbalance in Colorado River System. As such, we respectfully request that these concerns be addressed in the development of a preferred alternative that is legally sound, equitable, and protective of all Basin States' interests with reduction contributions from both the Upper and Lower Basin States.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph Olsen", with a long horizontal flourish extending to the right.

Joseph Olsen, P.E.  
General Manager