

March 2, 2026



Sent via electronic mail: crbpost2026@usbr.gov

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

RE: Draft EIS Comments regarding Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Dear Acting Commissioner Cameron:

Please accept the comments of the Northwest Colorado Council of Governments Water Quality/Quantity Committee (QQ) in response to Reclamation's Draft Environmental Impact Statement (DEIS) for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead.

QQ comprises 47 Colorado local governments located in the headwaters of the Colorado River and its tributaries. The QQ Region is united by its iconic landscapes and the growing importance of its recreation and tourism economy, all of which depends on the Region's water resources. Recreation activities with a water nexus include fishing, boating, skiing, and hunting. Fishing alone employs almost 2,200 people and has a direct economic impact of over \$1 million in Colorado's headwaters counties.¹ Rafting and kayaking contribute over \$9 million annually to headwaters economies.² It is therefore essential that any environmental impact analysis of operations within the Colorado River Basin considers cumulative impacts to the Upper Basin including streamflow, water temperature, riparian conditions, and water quality, and in turn what these impacts mean for local communities. We support and agree with the Colorado River Water Conservation District's comments and specific recommendations – particularly regarding the need to explicitly disclose Upper Basin shortages – and ask that you further analyze impacts to the Upper Basin during the development of the Final EIS.

¹ The Northwest Colorado Council of Governments Foundation, Inc. *Water and its Relationship to the Economies of the Headwaters Counties*. Prepared by Coley/Forest, Inc. (2012). https://www.nwccog.org/wp-content/uploads/2015/03/QQStudy_Report_Jan-2012.pdf.

² Id.



The DEIS repeatedly quantifies Lower Basin shortages in the main body of the document while relegating Upper Basin shortages to Appendix I. Upper Basin shortages should be included in the main document of the DEIS. The alternatives' sensitivity to Upper Basin demands is a crucial component of their overall effectiveness, including for assessing cumulative impacts from Lake Powell operations on upstream communities.

Operating regimes based solely on comparative reservoir elevations have failed to protect storage at Lake Powell. If water levels in Powell continue to drop, Colorado will further depend on high-elevation storage for meeting its compact obligations – storage which draws water from the QQ Region.

In conclusion, Upper Basin communities bear hydrologic variability at the source of the Colorado River system, especially in the in the headwaters where communities are the furthest upstream and often lack any reservoir storage for water supplies. Our economies depend on legally consistent and hydrologically realistic operations, and future operational guidelines and strategies for Lakes Powell and Mead must take impacts to the Colorado headwater communities into account.

We respectfully urge Reclamation to revise the DEIS to restore structural supply-demand balance, fully analyze Upper Basin conservation impacts, and include alternatives that perform under critically dry hydrology. Upper Basin impact analysis should include impacts on recreation tourism economies in the headwaters region and the environment to sustain these economies.

Thank you for your full and fair consideration of these comments.

Respectfully submitted this 2nd day of March, 2026.



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