



MEMBERS: City of Aztec* City of Bloomfield* City of Farmington* San Juan County* S.J. County Rural Water Users Association

March 2, 2026

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

Via E-mail to: crbpost2026@usbr.gov

Re: San Juan Water Commission's Comments on the Draft EIS on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Dear Sirs:

Pursuant to the Bureau of Reclamation's ("Reclamation") Notice in the Federal Register published on January 16, 2026, of a public comment period for the Draft EIS on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead ("EIS"), I hereby provide the following comments on behalf of the San Juan Water Commission. These comments are based on our review of Reclamation's public review draft of the EIS. The San Juan Water Commission appreciates the opportunity provided by Reclamation to comment on the EIS.

The SJWC's Interest

The San Juan Water Commission ("SJWC") is a political subdivision of the State of New Mexico created through a Joint Powers Agreement signed on March 5, 1986. The New Mexico Joint Powers Agreements Act, NMSA 1978, Sections 11-1-1 through -7, allows two or more public entities to jointly exercise common powers. The SJWC's five member entities are: the County of San Juan, the Cities of Aztec, Bloomfield and Farmington, and the San Juan Rural Water Users Association.^[1]

The SJWC's mission is to acquire, protect and allocate raw water supplies for municipal, industrial and domestic use among its member entities, which comprise all of the major municipal water entities in San Juan County. San Juan County has a population of approximately 122,000 residents. To fulfill its mission, SJWC is a participant in the Animas-

[1] The San Juan Rural Water Users Association is comprised of eight community water users associations, each of which is a nonprofit mutual domestic association organized under the Sanitary Projects Act, NMSA 1978, Sections 3-29-1 through -21, and recognized as a political subdivision of the State of New Mexico.

La Plata Project (“ALP Project”) and has a repayment contract with Reclamation. SJWC also is a member of the Animas-La Plata Operation, Maintenance and Replacement Association (the “ALP OM&R Association”), the entity operating the transferred works for the ALP Project. Currently, the SJWC holds permits for water diversions totaling more than 30,800 acre feet per year from the San Juan River Basin (not including the separate water rights of its individual member entities), with more than two-thirds of those rights associated with the ALP Project. Thus, the SJWC has a significant interest in Reclamation’s Post-2026 Operational Guidelines and Strategies for the Colorado River System, as an ALP Project contractor, as a member of the ALP Project’s transferred works operating entity, and as a user of the Colorado River System to provide drinking water to San Juan County.

Substantive Comments

Chapter 2, Description of Alternatives

1. 2.6.3.1, Lake Powell Mechanism. Do these paragraphs imply that conservation water from the Upper Basin can only be used in the Upper Basin? Once conservation water is converted to system water, is it allocated to all the states with all system water under all alternatives, or is conservation water system water reserved to Upper or Lower Basin?
2. 2.7.2.1, Primary Operations. Do the flows described include conservation water that has been converted to system water?
3. 2.8.4.3, Additional Modeling Alternatives. Under any of the alternatives, will Upper Basin States be required to provide water to supply gap water? If so, this concept should be removed.

Appendix B, Modeling Assumptions

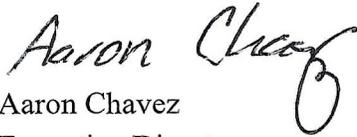
4. B.2.1, Lake Powell Mechanism. The last bullet in this section says credits can exceed total storage in Lake Powell. Can you explain how credits can exceed total storage?
5. B.6.1.2, Creation. How does storing unused water in Lake Powell increase the water supply for the system?
6. Assessments. Are the one-time assessment percentages, 7% (B.6.1.1) or 10% (B.7.1.2), converted to system water that can be used in the Lower Basin?
7. General question: Is the amount of conservation water based on the depletion amount of the water conserved or the diversion amount of the water conserved?

TA-3, Hydrologic Resource

8. At what point in the EIS process will a preferred alternative be presented? Further, will stakeholders have an opportunity to comment on it?

Thank you for the opportunity to comment on Reclamation's Draft EIS on Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. The SJWC reserves the right to supplement these comments, and to comment on any additional Reclamation recommendations concerning Post-2026 Operational Guidelines and Strategies.

Sincerely,

A handwritten signature in black ink that reads "Aaron Chavez". The signature is written in a cursive style with a large, looping flourish at the end.

Aaron Chavez
Executive Director,
San Juan Water Commission