

# SUBLETTE COUNTY COMMISSIONERS



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February 17, 2026

Bureau of Reclamation  
Attn: BCOO-1000  
PO Box 61470  
Boulder City, NV 89006

Re: Draft Environmental Impact Statement – Post-2026 Colorado River Operations  
Submitted via email to: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

To Whom It May Concern,

On behalf of the Sublette County Board of County Commissioners, we appreciate the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for Post-2026 Colorado River Operations.

Sublette County sits at the headwaters of the Green River, a principal tributary of the Colorado River. Our snowpack, streams, ranches, and reservoirs are part of the foundation of the Upper Colorado River Basin. Decisions made in this process will directly affect our agricultural producers, small communities, and working landscapes.

As negotiations move toward a post-2026 operational framework, we strongly support approaches that are grounded in current hydrologic reality. The river system today does not reflect the hydrology assumed at the time of the Colorado River Compact. Over the past two decades, the Basin has experienced persistent drought and aridification. In the Upper Basin, shortages are not theoretical — they occur automatically when snowpack is low and runoff declines. Our irrigators and water users absorb those reductions in real time, without compensation and without the operational flexibility available in the Lower Basin.

For that reason, Sublette County supports alternatives that:

- 1. Are supply-driven and based on actual hydrology.**  
Post-2026 operations must reflect what the river produces, not historical averages that no longer exist. A framework tied to actual system storage and forecasted inflows provides greater long-term stability than one anchored to fixed release assumptions.
- 2. Recognize the physical and legal realities of the Upper Basin.**  
The Upper Basin cannot deliver water that nature does not provide. Hydrologic shortages already occur upstream. Any new operational guidelines must acknowledge that reality and avoid imposing obligations that exceed available supply.
- 3. Distribute risk proportionally across the Basin.**  
The burden of adapting to reduced flows must be shared equitably. Upper Basin water

users, including those in Sublette County, have already experienced deep reductions during dry years. Long-term system stability requires shared responsibility among all Basin states.

4. **Protect rural and agricultural communities.**

Sublette County's economy is rooted in agriculture, natural resources, and small businesses. Operational decisions that increase uncertainty or shift disproportionate risk upstream threaten the viability of multigenerational ranching operations and the communities they sustain.

5. **Stabilize the system while minimizing litigation and conflict.**

We encourage continued negotiation among the Basin States and the Bureau of Reclamation to achieve a durable, consensus-based solution. A workable agreement grounded in hydrology is far preferable to prolonged legal disputes that do not create additional water.

Sublette County recognizes the importance of protecting critical reservoir elevations, hydropower generation, and downstream municipal supplies. At the same time, long-term sustainability will only be achieved if operations are aligned with the river's actual supply. Conflict will not change hydrology; adaptive management and shared responsibility will.

We appreciate the Bureau's effort to evaluate alternatives that respond to today's conditions rather than the assumptions of a century ago. We encourage selection of a post-2026 operational framework that is realistic, balanced, and sustainable for all Basin communities, including those of us at the headwaters.

Thank you for the opportunity to comment.

Sincerely,  


Lynn Bernard  
Chairman, Sublette County Commission