



**GREENLATINOS**  
Luchando por la Liberación Ambiental



March 2, 2026

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

To Whom It May Concern:

GreenLatinos appreciates the opportunity to submit comments on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – Draft Environmental Impact Statement (DEIS). The Colorado River Basin is a critical resource for more than 40 million people across the American West and northern Mexico<sup>1</sup> and provides water for approximately 5.5 million acres of irrigated agriculture. Latino communities, however, have historically borne a disproportionate share of the impacts of water scarcity, environmental degradation, and exclusion from water governance. Nationally, one out of every three Latinos in the United States either lives in or relies upon the Colorado River Basin for drinking water, employment, food systems, and cultural continuity.<sup>2</sup>

As a national nonprofit organization of Latino environmental and conservation leaders, GreenLatinos is committed to advancing environmental justice and ensuring that frontline communities have equitable access to water resources for consumption, sanitation, agriculture, and recreation. As climate change accelerates aridification and hydrologic uncertainty within the Basin, it is imperative that Latino voices, labor realities, and cultural water systems are

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<sup>1</sup> Landis, T. (2025, Dec 28). "Corporate interests are driving Colorado River to near collapse." Liberation News. Available at: <https://liberationnews.org/corporate-interests-are-driving-colorado-river-to-near-collapse/>. Accessed 23 Feb 2026.

<sup>2</sup> Ozarski, J. & Romero, J. (2022). "Opinion: People of color must be included in Colorado Water Plan decisions." Opinion, Opinions Columns. *The Colorado Sun*. Accessed 23 Feb 2026.



meaningfully integrated into post-2026 decision-making to ensure water management policies are robust, sustainable, and equitable.

The failure to reach agreement on the February 14th, 2026 deadline marks a definitive shift from years of state-led negotiations to direct federal intervention in the management of the Colorado River. With the seven Basin States unable to resolve longstanding tensions between the Upper Basin (Colorado, Wyoming, Utah, and New Mexico) and the Lower Basin (California, Arizona, and Nevada), the U.S. Bureau of Reclamation is now positioned to finalize a federal mandate by October 1, 2026. This transition carries profound social and economic consequences for the millions of Latinos who live and work in the Basin, a population that represents roughly one-third of all Latinos in the United States.

Federal intervention under the DEIS alternatives could result in disproportionate harms to Latino workers and communities depending on how reductions are allocated. Proportional or priority-based cuts may lead to significant reductions in agricultural production in regions where Latino labor is the backbone of local economies. In Colorado, approximately 75% of agricultural workers are Latino,<sup>3</sup> and reductions that lead to fallowing of farmland would directly threaten employment, increase economic instability, and ripple through rural communities such as the San Luis Valley, where schools, small businesses, and municipal services depend on agricultural tax bases. Similar risks exist across Arizona, California, and Nevada, particularly in highly productive agricultural regions such as the Imperial Valley and the Yuma area, which supply a substantial share of the nation's winter produce and employ hundreds of thousands of Latino workers.

Beyond labor impacts, mandated reductions that prioritize municipal supply over irrigation may exacerbate affordability challenges for low-income Latino households. As cities compete for increasingly scarce water supplies, rising water and food costs are likely to fall most heavily on communities already experiencing

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<sup>3</sup> Lfholm, N. (2021, Jul 25). "How is Colorado's new farmworkers' rights bill being received by migrant farmworkers? With a shrug." News. *The Colorado Sun*. Available at: <https://coloradosun.com/2021/07/25/colorado-migrant-farmworkers-bill-of-rights-onion-stop-labor/>. Accessed 23 Feb 2026.



economic precarity, compounding existing inequities in access to safe and affordable water.

Additionally, the West is seeing an unprecedented increase in the number of AI infrastructure being built throughout the basin. 40% of existing and proposed data centers in the United States are in areas that the World Resources Institute has characterized as experiencing high or extremely high water scarcity; 24 of the largest of centers, as well as 379 smaller ones, are in four states in the Basin.<sup>4</sup> As an example, in Arizona, 150 facilities are in operation or in the planning stage in Phoenix alone; if all these planned centers come online, Phoenix will experience a 32% increase in water stress.<sup>5</sup> These emerging demands within the Basin may further exacerbate water access and affordability issues that Latinos were grappling with prior to the introduction of AI infrastructure to their communities.

Along with these new stressors to the water system, the DEIS must also meaningfully address impacts to traditional and communal water systems, including acequias in southern Colorado and New Mexico. These centuries-old systems are not only vital for subsistence agriculture and domestic water use, but also represent living cultural infrastructure central to Latino land stewardship, governance, and identity. While many acequias hold senior water rights and benefit from state-level recognition and protections, they remain vulnerable under a federal mandate that fails to account for cultural, ecological, and social values beyond consumptive use. Cuts that disregard these systems risk permanent loss of land ownership, cultural practices, and community cohesion.

The alternatives presented in the DEIS range from No Action, which would perpetuate fragmentation and conflict, to Maximum Operational Flexibility, which

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<sup>4</sup> Campbell, D. (2025, Jun 24). "How data centers are deepening the water crisis." Business Insider. Available at: <https://www.businessinsider.com/how-data-centers-are-deepening-the-water-crisis-2025-6>. Accessed 23 Feb 2026.

<sup>5</sup> LaBrecque, S. (2025, Dec 17). "Desert storm: Can data centres slake their insatiable thirst for water?" Reuters. Available at: <https://www.reuters.com/sustainability/climate-energy/desert-storm-can-data-centres-slak-e-their-insatiable-thirst-water--ecmii-2025-12-17/>. Accessed 23 Feb 2026.



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allows for adaptive, coordinated management in response to hydrologic conditions and equity considerations. **GreenLatinos strongly supports the Maximum Operational Flexibility alternative.** This approach provides the best opportunity to promote transparency, incentivize conservation, and ensure coordination among states, indigenous tribes, acequia *mayordomos* (ditch managers) and *comisionados* (commissioners), agricultural producers, municipalities, and frontline communities. Importantly, it also offers the flexibility needed to incorporate environmental justice principles, protect culturally significant water uses, and mitigate disproportionate impacts to Latino workers and low-income households.

The post-2026 management of the Colorado River will shape the social, economic, and cultural future of the Basin for generations. GreenLatinos urges the Bureau of Reclamation to adopt a framework grounded in maximum operational flexibility, meaningful consultation, and environmental justice to ensure that the Basin's water future is both resilient and equitable for all who depend upon it.

Sincerely,

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