



March 2, 2026

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

Sent via email to: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

**RE: Comments on the Draft Environmental Impact Statement for Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead**

To the Bureau of Reclamation (“Bureau”):

Los Angeles Waterkeeper (“LA Waterkeeper”)<sup>1</sup> appreciates the opportunity to comment on the Draft Environmental Impact Statement (“DEIS”) for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead (the “Proposed Guidelines”); we urge the Bureau **to select the alternative that best incentivizes demand reductions through conservation and changing water uses in the region, rather than continuing a framework that fosters embrittled disputes over allocations of a shrinking water supply.**

As the DEIS notes, the primary reservoirs for the Colorado River Basin (“Basin”)—Lake Powell and Lake Mead—have fallen to historically low elevations since the onset of the current drought in 2000. As seen with the exceptionally dry start to the 2026 winter season, hydrologic conditions are projected to lead to even more longstanding droughts and more extreme emergency reservoir levels. The Colorado River’s future depends on bold action, not incremental adjustments. We need a management framework that protects clean water, communities, and ecosystems for generations to come. The Bureau has the opportunity to take meaningful action now to address the full reality of climate-driven water scarcity and the urgent need to protect water quality, ecosystems, and Basin communities.

Despite the clear need for urgent action both to address short-term shortages and plan for long-term crises, the DEIS is inconclusive: it does not clearly identify a preferred alternative despite the Bureau being legally required to do. The Bureau must significantly strengthen the DEIS to identify a preferred alternative that proactively addresses climate-driven water scarcity and hydrologic uncertainty, while ensuring the public has an opportunity to comment on the Bureau’s revised proposal and preferred alternative before issuing its final decision.

To this end, the Bureau should issue a Revised Draft EIS (“RDEIS”) with a preferred alternative that best prioritizes long-term water supply sustainability, meaningful Tribal consultation, and equitable reductions in demand for all Basin users to safeguard the ecological health of the Colorado River. The preferred alternative should not simply identify new ways to divide a declining water supply; it should also clearly articulate a long-term planning framework over a 20-year period that seeks to reduce overall water demand through conservation incentives, intentional land use

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<sup>1</sup> LA Waterkeeper is a non-profit organization with almost 30 years of experience serving as Los Angeles’ water watchdog, safeguarding the region’s inland and coastal waters using the law, science, and community action. LA Waterkeeper fights to eliminate pollution, to achieve ecosystem health for our region’s waterways, and to generate sustainable, equitable, and low-carbon local water supplies.

decisions in the region, and development of resilient new local water supplies throughout the region (such as through stormwater capture and reuse, wastewater recycling, and groundwater remediation). The status quo of allocating a shrinking water supply among fixed and/or growing water users is simply unsustainable. Additionally, the Bureau's framework for the Proposed Guidelines should also include a critical, short-term emergency operations protocol, which is inadequate as currently articulated under any of the proposed alternatives. Finally, the RDEIS should clearly articulate in unambiguous terms, in its main sections and appendices, how climate impacts are factored into the analysis of future shortages and emergency scenarios, and what data sets were used, so that all possible scenarios of hydrologic uncertainty (especially including worst-case scenarios) are adequately incorporated and addressed in the Proposed Guidelines.

Our requests are consistent with the petition submitted by LA Waterkeeper and nine other non-profit organizations in May 2025 (**Attachment A**), calling for the Bureau to exercise its regulatory authority under Title 43, Part 417 of the Code of Federal Regulations to evaluate whether water deliveries to Lower Basin users does not surpass what is "reasonably required for beneficial use."<sup>2</sup> The Proposed Guidelines discussed in the DEIS fail to account for the Bureau's authority under Part 417, maintaining significant uncertainty among Basin states as to what allocations are reasonable and continuing the decades of interstate disputes over Basin water allocations. Thus, as part of the Proposed Guidelines, the Bureau should implement its authority under Part 417 by (1) including processes for broad stakeholder input to define the critical phrase "reasonably required for beneficial use," (2) developing a robust publicly-transparent process for the Bureau to make determinations regarding whether any wasteful or unreasonable use of water is occurring, and (3) performing periodic assessments of Lower Basin water users to ensure consistent reasonable use of water over time.

Ultimately, the Colorado River Basin can no longer sustain business-as-usual water management and requires drastic new approaches to circumvent the looming crises. LA Waterkeeper therefore urges the Bureau to address decades of overallocation, accelerating climate impacts, and shrinking water supplies via a new robust management framework that emphasizes conservation and reductions in demand across all Basin states.

We thank the Bureau of Reclamation for the opportunity to comment on the DEIS for the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead. We look forward to collaborating with the Bureau to preserve, enhance, and restore the quality of water resources in the Los Angeles region and the rest of the Colorado River Basin for current and future generations. If you have any questions concerning these comments, please contact Benjamin Harris by email at [ben@lawaterkeeper.org](mailto:ben@lawaterkeeper.org) or by phone at (310) 394-6162 ext. 102.

Sincerely,



Bruce Reznik  
Executive Director  
Los Angeles Waterkeeper



Benjamin Harris  
Senior Staff Attorney  
Los Angeles Waterkeeper

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<sup>2</sup> See 43 C.F.R. §§ 417.2, 417.3.