



March 2, 2026

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

Via email: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Re: Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead draft EIS

Dear Reclamation:

Thank you for the opportunity to comment on [the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead draft EIS](#) (DEIS). The Pacific Institute has been actively engaged in the development of Colorado River policies and strategies for almost 30 years, participated in the development of alternative surplus and shortage guidelines for the river and the 2012 Basin Study, and has published many reports and articles on the sustainable use of Colorado River water. We submitted pre-scoping comments on the post-2026 guidelines on September 1, 2022 and scoping comments (with NRDC) on the supplemental environmental impact statement (SEIS) on December 20, 2022, which we incorporate here by reference.

We commend Reclamation staff for their extensive outreach and engagement efforts around the post-2026 guidelines, including the Integrated Technical Education Workgroup sessions and the on-going 2024 SEIS ROD Section 6(E) monthly meetings. We appreciate the tremendous amount of time and effort Reclamation staff put into the DEIS. Unfortunately, as we noted in our scoping comments, the magnitude of the on-going hydrologic crisis in the Colorado River basin requires a much more expansive range of alternative management options than the DEIS reviewed. This missed opportunity undermines the value of the DEIS and means that Reclamation will need to rescope the process and expand its analysis.

The DEIS notes that *“the 2007 Interim Guidelines have not sufficiently reduced risk.”* Yet the DEIS shows that none of the alternatives satisfies the *“preferred minimum performance”* objective to protect minimum pool at the major dams. Even the *“maximum flexibility”* alternative – imposing almost 2.43 million acre-feet of annual average reductions under roughly current runoff conditions – still leaves Lake Powell below elevation 3,500’ about 13% of the time and Lake Mead below elevation 975’ more than 20% of the time over the next twenty years, even assuming dramatically better initial reservoir elevations than are currently projected. Under *“critically dry”* conditions, none of the alternatives protects the system or its users. As we noted in our scoping comments, Reclamation should have taken a much more expansive approach to developing alternatives. To paraphrase the DEIS, *“the post-2026 DEIS alternatives do not sufficiently reduce risk.”*

Nor does the DEIS characterize risk appropriately. Appendix A of the DEIS notes that “monthly releases can be constrained due to physical limitations at Glen Canyon Dam.” Reclamation’s model assumes that “three out of four river outlet works are assumed to be available for use at any given time,” based on a recent Reclamation [Technical Decision Memo](#). Yet this memo also recommends

that Reclamation not rely on the river outlet works as the sole means for releasing water from Glen Canyon Dam as would be required at reservoir levels below the minimum power pool, elevation 3,490 ft. (p. 9, and summarized on p. 3-25 of the DEIS).

Appendix G shows that the Reclamation model’s “low” projected elevation of Lake Powell at the end of this year would be 3,511’. Yet the most recent CRMMS projection puts Powell’s “most probable” December elevation at 3,488’ and the “minimum probable” elevation at 3,469’ – 23 to 42 feet *below* the “low” projected initial condition contemplated in the DEIS. This year’s abysmal snowpack means that, unless Reclamation takes extraordinary actions to protect elevation 3,500’ and deplete storage at the Colorado River Storage Project (CRSP) Upper Initial Units, Glen Canyon Dam will dramatically reduce releases (risking Compact compliance challenges) or be forced to “*rely on the river outlet works as the sole means for releasing water.*” If aridification continues as projected, storage at the CRSP units will not be available in coming years to help project Glen Canyon Dam infrastructure. Unless Reclamation takes a more expansive view of protecting the Colorado River system as a whole, Reclamation will be forced to choose between protecting Glen Canyon Dam infrastructure and protecting Hoover Dam infrastructure.

Our scoping comments cautioned that limiting the scope to protecting Reclamation’s existing infrastructure would lead to a set of deficient alternatives incapable of addressing the significant challenges facing the system. The DEIS corroborates this. Even assuming better than actual conditions and ignoring Reclamation’s own recommendations about relying on Glen Canyon Dam’s river outlet works, none of the current alternatives will sufficiently reduce risk to the stability and sustainability of the Colorado River.

Reclamation will need to adopt a more holistic approach to Colorado River water management that focuses on the long-term sustainability of both the Basin’s population and natural environment, minimizes system vulnerability, and increases system resiliency. Reclamation will need to prioritize long-term sustainability over narrowly-defined operating strategies for Lake Powell and Lake Mead. The DEIS clearly shows that protecting routine operations of Glen Canyon and Hoover dams is not feasible given the continued decline in snowpack and runoff.

The failure of the existing alternatives to satisfy the purpose and need are a fatal flaw that suggests no need for additional comments. Yet the Institute’s long history of Salton Sea advocacy obliges us to note several errors in the DEIS’ inadequate discussion of Salton Sea impacts. The DEIS incorrectly relies on an ongoing Army Corps of Engineers NEPA process with unknown outcome and on the California Salton Sea Management Program’s “long-range plan,” which in fact is a set of “concepts” and not a project-specific plan. It is misleading to reference either of these processes as sufficient coverage for reasonably foreseeable adverse impacts resulting from significant inflow

reductions to the Salton Sea. Under the System Conservation Implementation Agreement, California's agricultural contractors are reducing their Colorado River use by more than 700,000 acre-feet over four years; it is not appropriate for the DEIS to ignore the potential impacts of such reasonably foreseeable future reductions. The DEIS should also note that the federal government owns more than 100,000 acres of Salton Sea lakebed; Reclamation itself owns more than 80,000 acres of such lakebed and may be directly liable for air pollution arising from such lakebed as it becomes exposed, especially as a result of Reclamation's reductions of deliveries to contractors in the watershed.

We acknowledge the urgency of implementing new guidelines for post-2026 river management. The DEIS may offer temporary coverage but will not resolve the river's challenges. Moving forward, Reclamation will need to analyze a broader and more responsive set of alternatives, including ones that recover the roughly 5.6 MAF of water stored in Lake Powell below 3490', as described in this blog post: <https://www.inkstain.net/2025/12/colorado-river-deadlines-incentives/>.

Despite the DEIS' generous modeling assumptions, none of the alternatives analyzed in the DEIS sufficiently reduces risk to the system or its water users. We encourage Reclamation to re-initiate the process so that a durable and resilient set of alternatives can be analyzed and one can be selected for WY2028 and beyond.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Cohen', with a stylized flourish at the end.

Michael Cohen

Senior Fellow  
Pacific Institute