



February 27, 2026

Ms. Carly Jerla
Senior Water Resources Program Manager
Bureau of Reclamation
Crbpost2026@usbr.gov

Re: Draft Environmental Impact Statement, Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead

Dear Ms. Jerla,

Sonoran Institute is a 36-year-old conservation organization that works to ensure that the Colorado River is managed in a more holistic, inclusive, and adaptive fashion to benefit communities and wildlife in the United States and Mexico.

The Sonoran Institute mission is to connect people and communities with the natural resources that nourish and sustain them. Our vision: A Colorado River Basin where rivers flow, landscapes are healthy, and all communities thrive.

Never in our 36-year history has our mission to connect people and communities with the natural resources that nourish and sustain them been as urgent. The Colorado River winds its way from the Rocky Mountains to the sea, providing a shared source of life for 40 million people. Today the future of our region is uncertain. Our success in managing water and the impacts of climate change--drought, heat, fire, and floods—will define growth and quality of life for the entire Colorado River community. Growing cities and towns as well as agriculture must use water more efficiently, the rivers and streams in the Colorado Basin must be protected and restored because warming temperatures are endangering plants, animals, and our communities now. Our programs provide communities with the tools to manage water and reduce many of the harsh effects of rising temperatures and drought. And we have a proven track record of bringing rivers and landscapes back to life.

We have a long history of facilitating dialogue in the Colorado River Basin with rural landowners, small towns, water districts, cities, Tribal Nations, and government agencies in developing collaborative approaches to management of land, water, and the species they support. Through our Growing Water Smart Program, we provide training and technical assistance to communities in the Colorado River Basin to reduce municipal water demand and increase resilience through water conservation, efficiency, re-use, and integrated water resource management. We also have pioneered river restoration efforts in the Basin, including the Colorado River Delta and Santa Cruz watershed, demonstrating the feasibility and benefits of large-scale restoration and policies that allocate water and funding for such efforts.

We would like to thank the Bureau for acknowledging the seriousness of the problem we all face. As we develop policy that will govern the Colorado River in years to come, it is imperative that we acknowledge that the river has never had the volume originally apportioned under the 1922 Colorado River Compact, that the current volume is declining rapidly, that this year's snowpack is expected to be among the worst, and that we may never return to the flows that we have been accustomed to in previous decades.

We would like to start our comments by noting that none of the alternatives described in the Draft Environmental Impact Statement (DEIS) adequately address on their own the challenges before us and that a preferred alternative will likely have to draw from among best strategies and tools described in the various alternatives.

Additionally, given the lack of preferred alternative in the DEIS, we strongly recommend that the Bureau of Reclamation continue its consultations with federal and state agencies, Tribal Nations, and stakeholders to inform development of a preferred alternative in the Final EIS.

Our comments on the DEIS are as follows:

1. ***Manage the entire river system in an adaptable fashion:*** Recognizing the variability and uncertainty around Colorado River Flows, we recommend tying future annual deliveries from the Upper to Lower Basin to available flows/supply. Deliveries should be based on a rolling three-year average of natural flows at Lee Ferry, while also considering storage capacity in the Colorado River Storage Project's four reservoirs.
2. ***Commit explicitly to rebuilding storage:*** There also needs to be a clear plan to rebuild water storage in Lake Mead and Lake Powell. Cuts in deliveries should be forecast to result in increasing elevations in Lake Mead and Lake Powell in the near term, supported even under the Bureau of Reclamation's "worst case" scenario, where the projected release deficit is more than 1.5M acre-feet, both the Lower and Upper Basin should assume cuts on a percentage-based apportionment, preferably as a negotiated settlement, or as determined by the Bureau of Reclamation. The Secretary of the Interior may on an as-needed basis utilize their authority to make release from upstream federal reservoirs to augment Lake Powell volume.
3. ***Provide flexible tools that incentivize water conservation:*** A "drought" conservation pool In Lake Powell and Lake Mead should be established to which communities, farmers and ranchers, and Tribal nations in both the Lower and Upper Basin and Mexico can contribute. A consistent and dedicated source of federal funding will be needed to underwrite water conservation efforts. Ensure that any water added to the conservation pool includes an allocation that acknowledges the inherent evaporation and transfer loss that may occur prior to the conservation of water in the two reservoirs. Contributions to the conservation pool must be permanent and measurable at the point at which water would otherwise be diverted. The Bureau of Reclamation should identify lands where water-use retirements should be prioritized, with an emphasis on lands with high water use, poor soils, and low economic productivity.

4. ***Ensure that water is allocated for environmental purposes:*** These including flows in the Colorado River Delta’s main channel that helps restore the Delta, water deliveries in support of fish conservation programs in the Upper Basin, the Lower Colorado River Multi-Species Conservation Program, and controlled flows through the Grand Canyon that improve sandbars, ecosystem integrity, and habitat conditions for listed species.
5. ***Recognize that federal funding will be needed to implement the guidelines:*** In addition to funding for water conservation, consistent and dedicated federal funding will be needed to continue to reduce municipal demand through waste water treatment enhancements allowing for direct potable-reuse, reduce agricultural demand through permanent land retirement, crop switching, and use of efficient water delivery systems, infrastructure upgrades to Glen Canyon Dam to improve flexibility to maintain Lower Basin water deliveries and reservoir function, quantification and legal entitlement of Tribal water rights, and financially support Tribal development of infrastructure to ensure delivery and use of water to which they are entitled.
6. ***Create meaningful opportunities for Tribes and stakeholders to provide input on the guidelines’ implementation:*** Given the Bureau of Reclamations’ recognition that implementing the next set of guidelines will occur in a period of “deep uncertainty,” lay out a transparent process to establish a Basin-wide adaptive management advisory body (or bodies) comprised of representatives from Basin states, Tribal Nations, Mexico, agriculture, and non-governmental organizations directed to provide ongoing advice to state, federal, and Tribal decision-makers. Supporting this body should be a transparent process by which data are generated and shared, scenarios are developed, and information made accessible. Specific criteria should be developed and reviewed annually to determine if the actions taken provide the intended results. The Bureau of Reclamation can draw from both the Colorado River Advisory Committee, the Glen Canyon Dam Adaptive Management Work Group, and Minute 323 Binational Work Group as examples to emulate.

We want to thank the Bureau for recognizing the imperative of active and meaningful involvement by all sovereigns, including Mexico and the 30 Colorado River Basin Tribal Nations, as well as stakeholder groups, in developing and implementing river management policy from the outset of the development of the Post-2026 Colorado River operational strategies. Sonoran Institute has staff and programs in Mexico who work daily with people that live in the Delta region. We understand their personal relationship with the lower Colorado River and their desire to ensure the river’s importance remains a key part of their culture and society.

Signed,



Dan Kimball
Chair, Board of Directors
Sonoran Institute



Mike Zellner
Chief Executive Officer
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