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January 25, 2026

Scott J. Cameron
Acting Commissioner
United States Bureau of Reclamation
1849 C Street NW
Washington, DC 20240-0001

via email: crbpost2026@usbr.gov

Subject: Colorado River System-Post 2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead-Draft EIS Comments

Dear Commissioner Cameron:

The Tortolita Alliance (TA) is a local (Marana, AZ) non-profit organization that advocates for land conservancy, ensuring protection of open space, wildlife habitat, watershed, and compatible recreational use.

TA has also been active in the area of water education, conservation, and ensuring an adequate water supply for the Tucson region and the entire southwest.

Thirty-six percent (36%) of Arizona's water supply comes from the Colorado River. The Colorado River system is in dire straits, with Lake Mead and Lake Powell at historic low levels.

We offer the following observations:

- Period 1 (1953-1974)[1]- Average Colorado River flow = 13.1 million acre feet per year (mafy)
- Period 2 (2000-2025)[2] - Average Colorado River flow = 12.2 mafy
- Average Colorado River flow for Periods 1 & 2 = 12.7 mafy
- Colorado River Full Allocation = 16.5 mafy
- Historic Allocation Imbalance = 16.5 – 12.7 = 3.8 mafy
- Experts[2] predict Average Colorado River flows to be even lower than 12.7 mafy in the future due to aridification.

[1] How Climate Change Is Impacting The Colorado River, Brad Udall, Senior Scientist/Scholar, Colorado State University, Grand Canyon River Virtual River Guides Training Seminar, March 27, 2022.
[2] Colorado River Insights, 2025-Dancing With Deadpool, Colorado River research Group, Jonathan Overpeck and Bradley Udall.

- In 2012, USBR[3] predicted a future 3.2 mafy imbalance
- Average Historic and Projected Imbalance = 3.5 mafy [(3.2 + 3.8)/2]

Draft EIS Figure ES-5-Key Performance Tradeoffs in Different Hydrologic Conditions (attached) supports the data presented above. USBR must use the worst hydrologic condition because optimistic hydrologic assumptions have not worked so far. Therefore, under Critically Dry conditions, the Maximum Flexibility Option provides the best reservoir conditions, but the shortage is 3.26 mafy. This is very close to the Average Historic and Project Imbalance of 3.5 mafy.

The data is clear---the Colorado River is over-allocated. There is not enough Colorado River water supply to meet existing or future demands, yet much of the southwest depends on it.

The existing and proposed operational strategies are not enough, and the parties cannot come to a consensus or agreement. We can no longer allocate Colorado River water that does not exist. Therefore, it is time for USBR to take drastic action and permanently cut Colorado River allocations in both the Upper and Lower Basins by 20% (3.5/16.5) across the board (Cut 20). This will be the new Law of the River.

Taking this action will protect our public water supply and the Colorado River ecosystem and force water suppliers and users to conserve and implement sustainable water supply planning.

Regards,

Mark L. Johnson
President

cc: Senator Mark Kelly
Senator Ruben Gallego
Congressman Juan Ciscomani
Tom Buschatzke, ADWR Director

[3] Colorado River Basin Water Supply and Demand Study, USBR, December 2012.

Figure ES-5
Key Performance Tradeoffs in Different Hydrologic Conditions