



Arizona Farm Bureau Federation

325 S. Higley Rd, Suite 210
Gilbert, AZ 85296

March 2, 2026

Bureau of Reclamation
Attn: BCOO-100
PO Box 61470
Boulder City, NV 89006

Submitted electronically via crbpost2026@usbr.gov

RE: Draft Environmental Impact Statement for Post-2026 Colorado River Operations

To Whom It May Concern:

The Arizona Farm Bureau Federation represents farmers and ranchers statewide who contribute \$31 billion annually to Arizona's economy. Water is the lifeblood of our agricultural community. Today, a prolonged Western drought threatens one of the most productive and diverse agricultural regions in the world. As water levels in Lake Powell and Lake Mead continue to decline, farming communities across Arizona that rely on the Colorado River will face significant impacts. In this context, it is important to recognize that agriculture in both the Lower and Upper Basins, by not fully utilizing annual water rights, has played a critical role in helping sustain the river system during the current drought.

Given the critical importance of water to agriculture, we appreciate the opportunity to submit comments in response to the Bureau of Reclamation's Draft Environmental Impact Statement (EIS) for Post-2026 Colorado River Operations.

A fundamental concern with the Draft EIS is that it does not present any alternative that adheres to the Colorado River Compact. Federal law is clear: Section 601 of the Colorado River Basin Project Act requires the United States to implement the Compact. However, each of the five proposed alternatives (No Action, Basic Coordination, Enhanced Coordination, Maximum Operational Flexibility, and Supply-Driven) assumes that Upper Basin states have no obligation to meet delivery requirements and would not make meaningful reductions in water use. This approach places the burden of shortages almost entirely on the Lower Basin and conflicts with established rights under the Compact and the broader Law of the River.

This imbalance is already evident. As drought conditions have persisted, Arizona has borne a disproportionate share of reductions. Under Tier 1 shortage conditions alone, Arizona's allocation has been reduced by approximately 18% (512,000 acre-feet), with significant impacts to

agriculture, municipalities, and long-term water planning. Yet the Draft EIS continues to rely on assumptions that shift future shortages primarily onto the Lower Basin.

The disparity between the Upper and Lower Basins further underscores this concern. While the Upper Basin uses less water overall, the Lower Basin supports far more irrigated acreage, approximately 5 million acres compared to 1.5 million acres in the Upper Basin, and produces significantly higher agricultural economic output per acre-foot.¹ Lower Basin states and Mexico fully utilize their 7.5 million acre-feet annual allocation, supporting approximately 40 million people, or roughly 75% of those who depend on the Colorado River system. In contrast, the Upper Basin has not historically used its full allocation but is assumed in the Draft EIS to increase its use without corresponding reductions.²

The Draft EIS also fails to adequately analyze the economic and national security consequences of the proposed actions. Each of the five alternatives would result in severe shortages to Arizona's Colorado River supply, affecting both municipal and agricultural users. Millions of Arizonans rely on water delivered through the Central Arizona Project (CAP), which provides approximately 36–40% of the state's total water supply. CAP alone delivers about 1.5 million acre-feet annually, over half of Arizona's Colorado River allocation, supporting municipalities, agriculture, tribal communities, and groundwater recharge. The Draft EIS does not sufficiently evaluate the socioeconomic impacts of significant reductions to this system.

Agriculture is particularly at risk. Arizona plays a critical role in national food production, with the Yuma region supplying approximately 90% of the nation's winter leafy greens. Furthermore, the southwest region of the U.S. produces large volumes of alfalfa, dairy products, melons, seed crops, durum wheat, and other valuable agricultural products, all of which are grown with Colorado River water. Central Arizona agriculture has already experienced substantial Colorado River cutbacks, reducing food and fiber production. Additional reductions, as contemplated under the Draft EIS, would further strain these operations and could disrupt domestic food supply chains. Food security is directly tied to national security, and reductions of this magnitude risk weakening the reliability and resilience of the nation's domestic food system. In this context, placing a disproportionate share of future reductions on agriculture in either the Lower or Upper Basin raises significant concerns

The Draft EIS also raises broader policy concerns about reallocating scarce water resources. The Lower Basin represents some of the most productive and economically valuable uses of Colorado River water. Shifting water away from these established uses to support undeveloped or future demands in the Upper Basin raises serious questions about efficiency and economic impact. Losing an existing water supply is often more harmful than never having developed it in the first place.

¹ USBR. May 2015. Moving Forward Effort: Phase 1 Report. Available online at:

<https://www.usbr.gov/lc/region/programs/crbstudy/MovingForward>

² USGS. 2019: Colorado River Basin Focus Area Study: Water Use. Available online at:

https://www.usgs.gov/mission-areas/water-resources/science/colorado-river-basin-focus-area-study-water-use?utm_source=chatgpt.com

While the five alternatives evaluated in the Draft EIS each attempt to address the challenges facing the Colorado River system, none provide a balanced framework that ensures shared responsibility across both basins. Arizona has demonstrated a willingness to take difficult and meaningful steps to address drought conditions. Moving forward, it is essential that all basin stakeholders do the same. We respectfully urge that any final EIS and subsequent operational decisions:

- Require equitable reductions across both basins in compliance with the Colorado River Compact and federal law
- Protect existing municipal and agricultural uses while fully addressing economic and national security impacts
- Avoid assumptions of increased Upper Basin use without corresponding obligations.

A durable solution to the challenges facing the Colorado River must be equitable, legally sound, and economically responsible. The current Draft EIS does not yet meet that standard.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Boelts". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Boelts".

John Boelts, President
Arizona Farm Bureau Federation