



Sent via electronic mail: crbpost2026@usbr.gov

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

RE: Draft EIS Comments regarding Post-2026 Operational Guidelines and Strategies for
Lake Powell and Lake Mead
March 2, 2026

Dear Acting Commissioner Cameron:

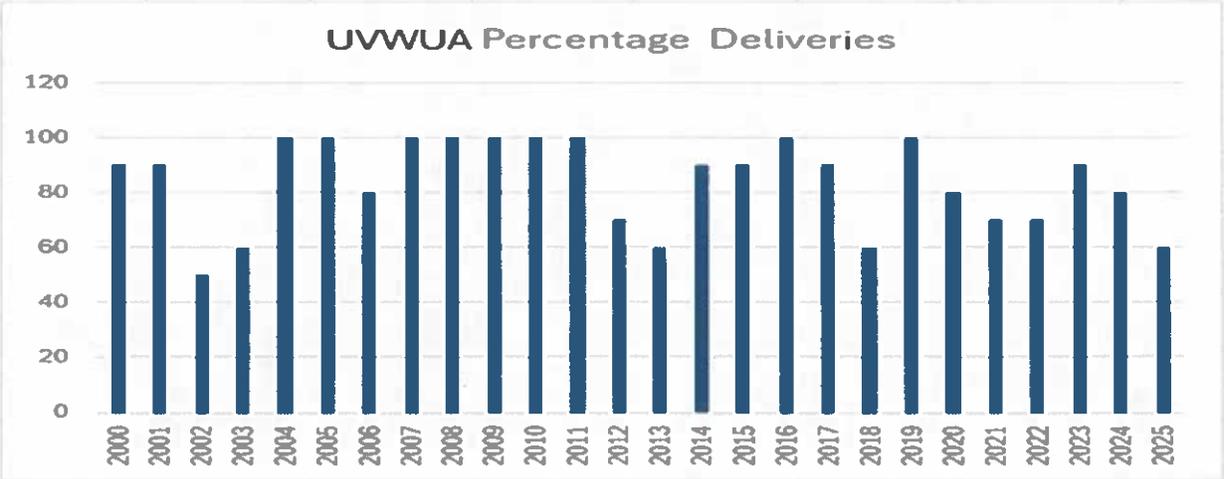
Please accept the comments from the Uncompahgre Valley Water Users Association (UVWUA). This historical and innovative irrigation system was the first major project approved by the Office of Reclamation Services, now the Bureau of Reclamation. The Uncompahgre Project, Gunnison Tunnel and Taylor Park Reservoir operations are critically intertwined with the Upper Gunnison and Uncompahgre Valley watersheds and the Aspinall unit. This system utilizes over 720 miles of infrastructure to deliver irrigation water to approximately 84,000 acres in the Uncompahgre Valley. In addition, our system serves as the primary raw water supply for 6 municipalities totaling approximately 35,000 residents. UVWUA has further developed the system with investments in 6 hydro power generating facilities. Our deliveries for irrigation enhance existing stream flows allowing for increased recreational opportunities as well as improved aquatic habitat on the Uncompahgre River. Further investments in our system provided increased water conservation through the piping of laterals that also greatly reduced the salt and selenium loads and improved water quality in critically identified areas.

We mention this brief overview of this project to establish our 120+ year history and strong nexus to Reclamation. Having operated the project since 1927 we have dealt with a wide range of diversity, but our greatest challenge is variable hydrology.

From this perspective we offer the following comments on Reclamation’s Draft Environmental Impact Statement (EIS) for the Post 2026 Operational Guidelines for Lakes Powell and Mead. We believe that Reclamation must institute significant changes that remain consistent with the 1922 Colorado River Compact, the 1944 binational treaty with Mexico, the 1948 Upper Basin Compact, and other foundational elements of the Law of the River. For 120 years these documents have served the west well.

The UVWUA has lived within hydrologic reality for over a century. The Draft EIS seems to change operational priority from reality to ‘predictability’. The Lower Basin states have benefited from steady, predicable reservoir releases divorced from snowpack and supplies from mother nature. In many years the UVWUA must require all stakeholders to reduce their water use purely because there is no available water. We have experienced this in 17 of the last 26 years. It seems this is our new normal all while our Lower Basin neighbors overuse has created the situation we are now facing. Predictably, there is a loss of balance between supply and demand across the basin.

This graph displays the percentage cuts applied across our stakeholders- with no compensation – and one can see that cuts deepen as the shortages deepen. Like adjustments are not made in Lower Basin states. Given the extremely low snowpack across the western slope of Colorado this year we fully anticipate that we will face additional percentage allocations possibly as low as 50% in 2026.



UVWUA cooperates regularly and in detail with both Colorado River Commissioner Becky Mitchell, and also works closely with the Colorado River District (CRD). UVWUA has been very clear with both entities that these Post 2026 operation guidelines are of critical importance to the viability of the UVWUA system and our local economies.

UVWUA fully supports comments made by Commissioner Mitchell and those submitted by the CRD.

The following comments are UVWUA concerns specific to facts found within the EIS.

- 1) The assumed water conservation alternatives from lower basin states range from zero to 500,000 feet annually. Our experience would indicate that hydrology would indicate that these conservative values are inadequate to meet the hydrologic reality. Any suggestion that upper division states can fill the gap leads to significant and potentially permanent adverse consequences specifically for a system such as UVWUA! These shortages need to be explicitly analyzed and disclosed. Lacking EIS analysis of effects to any change in upper division water management is a critical flaw for this effort.

- 2) CRSP Upper Initial Units. Any operational changes to the Aspinall unit for the benefit of Lake Powell must also consider the impacts on local water rights administration as they could impact on the administration of UVWUA's senior diversions through the Gunnison Tunnel and must remain within the scope of the existing ROD's

In conclusion, the EIS as written raised concerns about UVWUA long term viability. The CRD comments provide deeper analysis and many of Commissioner Mitchell's comments reflect the concern about how UVWUA could identify any immediate water savings when there is no water to give (see cuts by year above). We continue to encourage on-going negotiations toward a seven-state solution and hope that consensus can be formed to establish a sustainably secure system rather than continue in long term crisis management.

Thanks for your efforts and consideration...

Sincerely,



Steve A Pope
General Manager, U.V.W.U.A.