



# UPPER COLORADO RIVER COMMISSION

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May 22, 2026

Scott J. Cameron  
Acting Commissioner  
U.S. Bureau of Reclamation  
1849 C Street, NW  
Washington, D.C. 20240-0001

VIA ELECTRONIC MAIL

RE: Upper Division States' Input Regarding 2027-2028 Lake Powell and Lake Mead Operations and Response to the Lower Division States' Proposed Operations

Dear Acting Commissioner Cameron:

The Upper Division States of Colorado, New Mexico, Utah, and Wyoming (UDS) appreciate Reclamation's May 7, 2026 presentation on the "preliminary" preferred alternative framework for Post-2026 Colorado River operations. During a May 17, 2026 meeting, you asked for input for 2027 and 2028 operations of Lake Powell and Lake Mead, including a written response to concepts outlined by the Lower Division States of Arizona, California, and Nevada (LDS). The UDS acting through the Upper Colorado River Commission (UCRC) submit the following responses.<sup>1</sup>

## **I. UDS INPUT REGARDING 2027 AND 2028 OPERATIONS**

Reclamation, as part of its preliminary preferred alternative, has identified the need for operational principles which include adopting hydrology-responsive operations by managing the system conservatively during low inflow conditions and transitioning to a recovery posture as conditions improve, to stabilize the system, and to ensure a more resilient, adaptive operating regime. The UDS are sharing concepts for operations upstream of Lee Ferry that will implement Reclamation's primary operational principle, with three caveats. First, the UDS recognize that Interior will make the operating decisions for Lake Powell and Lake Mead. Second, operations will be such that LDS operations will not adversely impact operations upstream of Lee Ferry. Third, that these concepts are for 2027 and 2028 operations only.

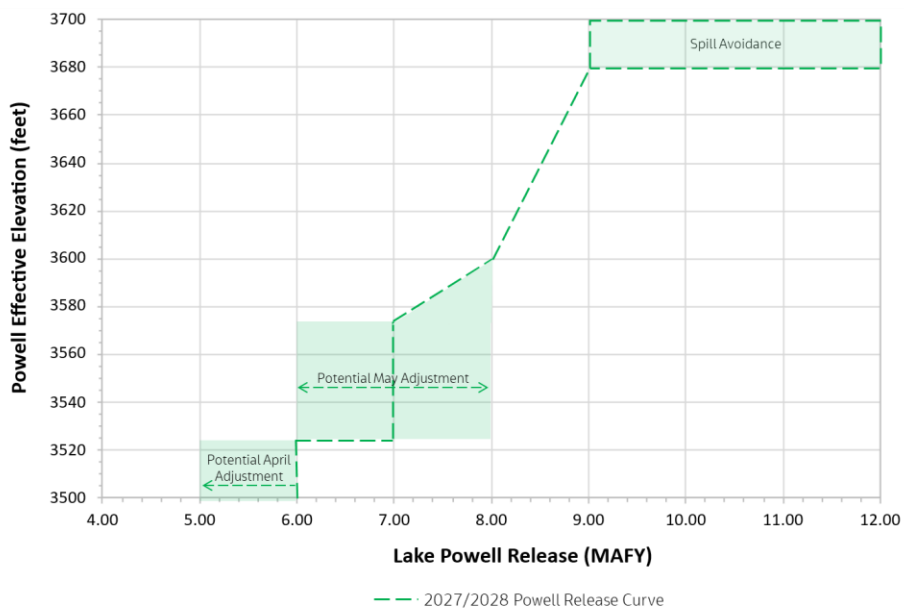
For operations upstream of Lee Ferry, the UDS focus on three components: Lake Powell releases, Upstream Initial Unit (UIU) operations including recovery, and UDS Contributions to Lake Powell and UIUs. The UIU operations and UDS Contribution components are parallel to, but outside of, the Post-2026 Record of Decision for the operation of Lake Powell and Lake Mead (ROD) and must be implemented through separate agreements between the UDS and Reclamation. The UDS provide the following operational concepts upstream of Lee Ferry:

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<sup>1</sup> The UDS have not had sufficient time to model the concepts discussed herein. As such, the UDS reserve the right to amend these concepts once they have completed appropriate modeling.

**For WY 2027/2028 Lake Powell Operations:**

- A. If Lake Powell’s elevation on October 1 is <3525’, release 6.0 MAF,
  - 1. Reclamation retains its ability to adjust monthly releases within the annual volume and withhold releases to address declining elevations at Lake Powell
- B. If April 24-month Study most probable Powell elevation is projected to drop below 3,500’ within the next 12 months:
  - 1. Drought Response Operations Agreement (DROA) release of up to 500 KAF (DROA releases and recovery will be in accordance with a successor to the existing DROA agreement between the UDS and Reclamation)<sup>2</sup>
  - 2. Reduce Powell releases by at least an amount equal to DROA releases, to help protect 3,500’
  - 3. Consultation among the Basin States and Reclamation if the combined actions are insufficient to protect elevation 3500’
- C. If Lake Powell’s elevation on October 1 is between 3525’ and 3575’, release 7.0 MAF and recover previous DROA releases in accordance with DROA agreement
  - 1. If May 24-month Study most probable EOWY Powell elevation is projected above 3600’, adjust releases to 8.0 MAF
  - 2. If May 24-month Study most probable EOWY Powell elevation is projected below 3,525’, adjust releases to 6.0 MAF
- D. If Lake Powell’s elevation on October 1 is between 3575’ and 3600’, release from 7.0 MAF up to 8.0 MAF
  - 1. If May 24-month Study most probable EOWY Powell elevation is projected above 3600’, adjust releases to 8.0 MAF
- E. If Lake Powell’s elevation on October 1 is between 3600’ and 3680’, release from 8.0 MAF up to 9.0 MAF
- F. Lake Mead operations, including Intentionally Created Surplus (ICS) operations, for 2027 and 2028 must not influence operations upstream of Lee Ferry



<sup>2</sup> Any reference to “DROA” in this letter refers to a successor to the existing DROA agreement.

**UIU Operations:**

- A. UIU operations are outside the scope of the ROD
- B. UIU operations will be implemented consistent with each UIU's respective record of decision
- C. UIU operations will be implemented through DROA for the term of the ROD
- D. For DROA Year 2026 through DROA Year 2028, unrecovered DROA releases will not exceed 1.5 MAF, absent additional consultation
- E. Recovery of UIU releases will be pursuant to the terms of DROA

**UDS Contributions:**

- A. UDS contributions creation and accounting will be implemented through an agreement between the UDS and Reclamation which shall be in effect for the term of the ROD
  - 1. Includes credit for appropriate 2025 and 2026 contributions as outlined in the UDS - Reclamation Provisional Accounting MOU
- B. UDS Contribution credits will be operationally neutral for Lake Powell operations
- C. UDS Contribution Agreement will include annual accounting reports and consultation with the LDS
- D. By the end of WY 2028, the UDS have a goal of accruing more than 100,000 AF of Contribution credits, if: (1) sufficient federal funding is available; (2) 2025 and 2026 provisional credits are appropriately included; and (3) hydrologic conditions allow contributions
- E. UDS Contribution account credits will accrue during 2027 and 2028 and will be considered for operations after WY 2028 as appropriate

**II. UDS RESPONSE TO LDS CONCEPTS FOR 2027-2028 OPERATIONS**

You asked for response to the 2027 and 2028 concepts provided jointly by the LDS. The UDS provide the following observations:

- A. The UDS support the LDS's commitment to reduce use by at least 1.25 MAF/yr. The UDS also recognize the LDS effort to agree upon how the reductions are distributed.
- B. LDS proposed operations of Lake Powell do not adequately protect Lake Powell from declining below critical elevations. Further, the proposal risks increasing the frequency and magnitude of UIU releases and delays recovery of the UIU releases. In short, the operations proposed upstream of Lee Ferry unreasonably increases the risk at Lake Powell, Flaming Gorge, Blue Mesa and Navajo reservoirs. As such, the proposed operations are legally and operationally flawed.
- C. The LDS propose additional releases from Lake Powell under certain conditions to recover any "reduced releases." Interior and Reclamation do not have any authority to address "reduced releases" as proposed by the LDS.
- D. The UDS seek more transparency for the proposed operations of Lake Mead. The LDS proposal does not clearly describe releases from Lake Mead, including the effect of current and future ICS.
- E. The UDS support development and implementation of storage pools in Lake Mead to allow for flexible operations below Lee Ferry, so long as those flexibilities do not adversely impact operations upstream of Lee Ferry. The UDS seek assurances that flexibility and the operation of storage pools in Lake Mead will not adversely impact operations upstream of Lee Ferry.

- F. The LDS demand for a plan to address long-term operational and structural risks and associated pilot releases at Glen Canyon Dam, and the LDS proposals associated with studies and operations of UIUs, would constitute new proposed federal actions. Therefore, such actions are outside the scope of the Post-2026 NEPA process for the operation of Lake Powell and Lake Mead.

The operations and concepts described herein do not represent interpretations of existing law by the UDS. The UDS expressly reserve their rights under applicable law, including, but not limited to the Law of the River. Nothing in this submittal is intended, nor shall be construed, to interpret, diminish, or modify the rights of the UDS or the UCRC under federal or state law or administrative rule, regulation, or guideline. This submittal is not intended to be, and shall not be construed in any way as, a waiver of any such rights. Moreover, we reserve the right to provide further comments, consult with the Secretary, take any other necessary steps, and engage with Reclamation as it proceeds with subsequent phases of the Post-2026 NEPA process for the operation of Lake Powell and Lake Mead.

The UDS appreciate Reclamation's efforts to complete the Post-2026 NEPA process for the operation of Lake Powell and Lake Mead. We thank you for considering our input and observations.

Sincerely,

UPPER COLORADO RIVER COMMISSION



Charles R. Cullom  
Executive Director