



March 2, 2026

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

Delivered via email: [crbpost2026@usbr.gov](mailto:crbpost2026@usbr.gov)

Re: Comments on the Notice of Intent to Prepare an Environmental Impact Statement for Post-2026 Operational Guidelines

To Whom It May Concern:

This letter provides formal comments from Imperial Valley agricultural water users regarding the Bureau of Reclamation's Notice of Intent to prepare an Environmental Impact Statement (EIS) on the development of Post-2026 Operational Guidelines. Imperial Valley water users are disappointed in the alternatives currently outlined in the Federal Register notice but are utilizing this opportunity to clearly define our community's Colorado River management priorities essential to protecting the long-term viability of our agricultural region.

### **I. Legal Framework and Priority System**

While we recognize that a long-term solution to Colorado River hydrological deficits requires the constructive participation of all basin states, we must reiterate that Imperial Valley water users receiving water via the Imperial Irrigation District (IID) have no legal obligation for further reductions in their water allocation. While we have been active participants in voluntary, compensated conservation programs to support the Colorado River, these contributions do not constitute a permanent reduction in or modification to our senior water rights. We strongly oppose any attempt to modify or circumvent existing water rights.

Future Colorado River reservoir operating guidelines must respect the established priority system and the Law of the River. As landowners in the Imperial Valley, we view any action that infringes upon our Present Perfected Rights (PPR) as an unconstitutional "taking."

### **II. Recognition of Conservation**

Imperial Valley farmers are leaders in water conservation and efficient agricultural water use practices, utilizing integrated technology and irrigation innovation to grow more food with less water. To fully incentivize these efforts, there must be formal recognition for modern on-farm conservation efforts and water storage opportunities to provide operational flexibility to both water users and the reservoir system. The inclusion of on-farm conservation and deficit irrigation conservation in IID's

recent federal System Conservation Implementation Agreement was a step in the right direction and resulted in the addition of about 800,000 AF of System Conservation Water in Lake Mead, or about 12 feet of elevation. Expanding the types of authorized ICS conservation methods, to include newer and developing on-farm water concepts and programs, will expand potential opportunities for growers to generate new ICS.

To ensure we can continue to be the best stewards of these scarce resources, Imperial Valley water users request the Bureau expand and enhance water storage programs and flexibility to support elevations in Lake Mead.

### **III. Hydrological Modeling and Future Operations**

We urge the Bureau to avoid the use of misleading hydrology projections in the Post-2026 Guidelines. The 2007 Interim Guidelines provided valuable experience in reservoir management; however, future operational decisions must be rooted in specific, accurate water management and forecasting tools that reflect the reality of the river's yield.

As we work with neighboring states and the Federal government on long-term solutions, we remain committed to upholding the law and acting as responsible water users. We are prepared to do our part to keep the river healthy, provided our legal rights and conservation investments are fully respected and protected.

Thank you for consideration of our comments.

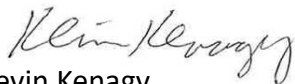
Sincerely,



Paula Pangle  
President, Imperial County Farm Bureau



Steve Benson  
Chairman, Imperial Valley Water (IVH2O)



Kevin Kenagy  
President, Imperial Valley Vegetable Growers Association

Cc: President Karin Eugenio, IID Board of Directors  
Vice President J.B. Hamby, IID Board of Directors  
Director Alex Cardenas, IID Board of Directors  
Director Gina Dockstader, IID Board of Directors  
Director Lewis Pacheco, IID Board of Directors  
Ms. Jamie Asbury, General Manager, IID  
Ms. Tina Shields, Water Department Manager, IID  
Mr. Mike Pacheco, Water Department Manager, IID