



City of Needles

817 Third Street, Needles, California 92363
(760) 326-2113 • FAX (760) 326-6765
www.cityofneedles.com

Mayor Janet Jernigan
Vice Mayor Ellen Campbell
Councilmember Tona Belt
Councilmember Jamie McCorkle
Councilmember JoAnne Pogue
Councilmember Henry Longbrake
Councilmember Larry Ford
City Manager Patrick Martinez

February 10, 2026

Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006
Email: crbpost2026@usbr.gov

RE: Bureau of Reclamation's Post-2026 Draft EIS Public Comment from the City of Needles

To Whom It May Concern:

On behalf of the City of Needles, we respectfully submit these comments in response to the Bureau of Reclamation's Post-2026 Draft EIS published in the Federal Register on January 16, 2026.

The City of Needles is located in eastern San Bernardino County, California, along the Colorado River. The City holds miscellaneous present perfected rights ("PPRs") with a priority date of 1885 under Contract No. 05-XX-30-W0445 for 1,500 acre-feet of annual diversions, limited to 950 acre-feet on a consumptive use basis. The City also acquired from the Atchison, Topeka and Santa Fe Railway Company certain perfected water rights held by the Santa Fe Railway, with a priority date of 1896, for 1,260 acre-feet of annual diversions, limited to 273 acre-feet on a consumptive use basis. In addition, there are eight (8) other PPR entitlement holders within the City of Needles.

The City's PPR contracts are recognized in the Consolidated Decree of the Supreme Court of the United States in *Arizona v. California*. Under that decree, present perfected rights are treated as the most senior and highest-priority water rights. Protection of these senior rights must remain a foundational principle of any future operating framework.

The Draft EIS analyzes a broad range of reasonable alternatives for the operational elements identified in the proposed federal action post-2026. The City of Needles strongly supports the Maximum Operational Flexibility Alternative, particularly where shortages are distributed in a manner that fully recognizes and protects present perfected rights. In addition, the City recommends continuing current strategies based on existing agreements among the Lower Basin states. We further urge that comparable conservation and shortage management measures be implemented by Upper Basin states to ensure a more equitable, basin-wide approach. The City of Needles has actively participated in existing agreements and has made water conservation a high local priority, despite its relatively small size and limited resources.

Thank you for the opportunity to comment on this important matter. If you have any questions, please contact Rainie Torrance, Utility Manager, at rtorrance@cityofneedles.com or (760) 326-5700 ext. 140.

Janet Jernigan
Mayor, City of Needles