



Save The Colorado River Campaign, PO Box 1066, Fort Collins, CO 80522

SaveTheColorado.org

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**Date: Dec. 12, 2022**

**TO:** Reclamation 2007 Interim Guidelines SEIS Project Manager, Upper Colorado Basin Region

**Delivered by email to:** [CRinterimops@usbr.gov](mailto:CRinterimops@usbr.gov), cc: [dfwilliams@usbr.gov](mailto:dfwilliams@usbr.gov) and [mbainson@usbr.gov](mailto:mbainson@usbr.gov)

**From:** Save The Colorado, PO Box 1066, Fort Collins, CO 80522; [Gary@SaveTheColorado.org](mailto:Gary@SaveTheColorado.org)

**RE:** 4332-90-P, DEPARTMENT OF THE INTERIOR, Bureau of Reclamation: Notice of Intent to Prepare a Supplemental Environmental Impact Statement for December 2007 Record Of Decision Entitled Colorado River Interim Guidelines For Lower Basin Shortages and Coordinated Operations For Lake Powell and Lake Mead (posted here: [https://www.usbr.gov/main/docs/22-10-28\\_NOI\\_BOR\\_CO\\_River\\_SEIS\\_OES%20Final\\_508.pdf](https://www.usbr.gov/main/docs/22-10-28_NOI_BOR_CO_River_SEIS_OES%20Final_508.pdf) and described here: <https://www.usbr.gov/ColoradoRiverBasin/SEIS.html>)

*“Original sin, the true original sin, is the blind destruction for the sake of greed of this natural paradise which lies all around us—if only we were worthy of it.”*

– Edward Abbey, *Desert Solitaire*

**Dear U.S. Bureau of Reclamation,**

On behalf of Save The Colorado’s board of directors and our thousands of members and supporters throughout the Southwest U.S., we respectfully submit the following comments on your SEIS.

First, as the 2007 Interim Guidelines for management of the Colorado River are replaced, Save The Colorado believes the ecological health of the river must be given a center seat at the table because it is the health of the river that sustains almost all human and non-human life in the Southwest U.S. Further, only by happenstance – quirks of the Endangered Species Act or water rights that force water downstream – has the river’s ecological health played any role in any past management plans or activities. That must change.

Second, we strongly encourage you to consider and adopt solutions that are long-term, equitable, sustainable, and actually solve the problems on the Colorado River rather than kick the can down the road for a few years by simply tweaking the 2007 Interim Guidelines. All climate science indicates that the Colorado River will likely have significantly and consistently lower flows in the future, perhaps mirroring some of the lowest hydrology on record, like 2021. You must prepare and manage for “worst-case scenarios”.

Finally, the Colorado River not only needs to be “fixed,” steps need to be taken – using Nature-Based Solutions – that are also “climate action” to mitigate, and create adaptation to, climate change.

**The guidelines for lower basin shortages and coordinated operations for Powell and Mead Reservoirs shall include:**

1. Stopping all proposed new dams and diversions across the entire basin because they divert more water out of the river, exacerbate ecological harm, and escalate political and management chaos.
2. Decommissioning Glen Canyon Dam and draining what little water is left in Lake Powell down into Lake Mead. This “one reservoir” solution will be dramatically cheaper, hugely environmentally beneficial to Glen and Grand Canyons, and less politically corrosive than trying to quickly dry up a few millions of acres of farms to try and temporarily save Lake Powell. This “Nature-Based Solution” will not only repair the delicate ecology of Glen and Grand Canyons, it will provide a long-term climate solution for the Colorado River as flows decrease over time.
3. Further enacting policies that try to save Lake Mead using drought plans, conservation plans, water allocation plans, reservoir-draining or farm-drying plans, crop switching plans, or augmentation through desalination.
4. Letting an estimated 10% of the total water in the river flow through the Colorado River Delta to the Sea of Cortez every year, which will require a new agreement with Mexico. It’s time to partially return the flora and fauna to the Delta described by Aldo Leopold exactly 100 years ago in 1922 in *The Sand County Almanac*:

*“At each bend we saw egrets standing in the pools ahead, each white statue mashed by its white reflection. Fleets of cormorants drove their black prows in quest of skittering mullets; avocets, willets, and yellow-legs dozed one-legged on the bars; mallards, widgeons, and teal sprang skyward in alarm.”*

By partially restoring the Colorado River Delta, and more fully restoring Glen and Grand Canyons (see #2 above), this “rewilding” of the Colorado River will also serve as significant climate action that increases biodiversity, restores endangered fish, and helps the landscape sequester more carbon in vegetation, wetlands, mangroves, and riparian ecosystems.

5. Distributing Native American water rights settlements from, and subtracting those rights from, currently diverted water users, not by or from new diversions or depletions of water out of the river. Alternatively, if tribes wish, they can be paid to keep their water in the river which would be a less impactful solution to all other users and hugely ecologically beneficial to the river itself.
6. Dividing what water is left in the river, on an average yearly basis, by distributing it out to water users based on percentages, not absolute amounts. The percentages shall be equitably distributed such that current users receive amounts of water equally proportional to their current diversion amounts.

These comments are posted here. Thank you for considering our comments. Please reach out with any questions.



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