



Date: August 7, 2023

TO: U.S. Bureau of Reclamation, Post 2026 Colorado River Public Scoping

Delivered by email to: crbpost2026@usbr.gov

From: Save The Colorado, PO Box 1066, Fort Collins, CO 80522; Gary@SaveTheColorado.org

RE: 88 FR 39455, DEPARTMENT OF THE INTERIOR, Bureau of Reclamation: Notice of Intent To Prepare an Environmental Impact Statement and Notice To Solicit Comments and Hold Public Scoping Meetings on the Development of Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead^{1,2}

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 the Post 2026 Colorado River Public Scoping. These comments add to, and build on, our pre-scoping comments that we sent you and appeared in your pre-scoping report³.

1. Generally:

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.

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. 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 allow adaptation to, climate change.

We watched the USBR webinar video to guide our comments and understand the process⁴. We point out that in the video, USBR Commissioner Touton said the 2026 Guidelines and Strategies would be a “*science-based decision-making process*” reflecting “*continued drought conditions*”. Our comments are 100% science-based reflecting continued drought conditions. We also point out that in the webinar video, it was stated by USBR staff that part of the intent of the Guidelines and Strategies is to provide “*long term sustainability of the environment*” and that “*alternative paradigms should be explored*”.

In the Notice of Intent⁵, USBR states, “*Alternative paradigms, e.g., basing reservoir operations on combined reservoir or system storage, should be explored.*” The Notice also states that post 2026 Guidelines and Strategies should “*be capable of both withstanding a broad range of future hydrologic and operating conditions and minimizing system vulnerability...*” and that management should focus on “*long-term sustainability of both the Basin’s population [sic⁶] and natural environment...*”

Further, the Notice also says, the Guidelines and Strategies should, “*provide additional mechanisms for the storage and delivery of water supplies in Lake Mead to increase the flexibility of meeting water use needs from Lake Mead, particularly under drought and low reservoir conditions.*”

We bring your attention to this story in the *Los Angeles Times*⁷ dated July 30, 2023, and its reference to the UCLA study⁸ in it. The study points out that temperatures across the Colorado River basin have already risen an average of 2.7 degrees F, and “*The scientists estimated that for each additional 1.8 degrees Fahrenheit of warming, the river’s flow could shrink by about 7%.*”

In the *LATimes* article, Jonathan Overpeck, a renowned climate scientist says, “*Half of the flow of the Colorado River may be lost due to climate change by mid-century. I think that would be a more prudent way to look at it. Because it’s well within the scientific understanding at this point, and you don’t want to assume that you have more water than you really do.*”

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.

We believe that the post 2026 Guidelines and Strategies must prepare for up to a 50% reduction in flow of water in the Colorado River by the year 2050, a mere 25 years in the future.

2. Specifically:

First, we bring to your attention a recent scientific paper published in April 2023 by Schmidt et al., titled, “The Colorado River water crisis: Its origin and the future”⁹. The paper supports the general thesis that climate-induced warming will further deplete flows in the Colorado River. In

addition, the paper's central point is that reduced flows will necessitate a rethinking of reservoir operations, and the authors propose a 'one reservoir solution' stating, *"Future policy debate about reservoir operations will inevitably concern whether most, or all, reservoir storage should be in Lake Mead or in Lake Powell. The choice of one or the other will result in significantly different environmental and recreational outcomes for Glen Canyon and Grand Canyon."*

We believe that the post 2026 Guidelines and Strategies must include an alternative that bypasses and decommissions Glen Canyon Dam, and drains what 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 drying up a ~million of acres of farms to try and temporarily save Lake Powell. This alternative is also a "Nature-Based Solution" that will not only repair the delicate ecology of Glen and Grand Canyons, but will provide a long-term climate solution for the Colorado River as flows decrease over time.

Further, we call this alternative the **"Grand Canyon Restoration Alternative"** because of its profound impacts on restoring the ecology of one of America's most renowned National Parks as well as one of the Seven Natural Wonders of the World.

Second, because of the currently depleted flows and predictions for future depletions of up to 50% of the entire river, USBR must stop all proposed new dams and diversions across the entire basin because they will divert more water out of the river, exacerbate ecological harm, and escalate political and management chaos.

Third, USBR must enact 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.

Fourth, USBR must negotiate with Mexico to let an estimated 10% of the total water in the river flow through the Colorado River Delta to the Sea of Cortez every year. It's time to partially return the flora and fauna to the Delta described by Aldo Leopold over 100 years ago in 1922 in *The Sand County Almanac*:

"At each bend we saw egrets standing in the pools ahead, each white statue matched 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."

Further, the Schmidt et al. paper¹⁰ states, *"Rehabilitation of dewatered ecosystems in the Colorado River Delta and in some Upper Basin tributaries will require continued commitment among users to protect existing environmental flows and to acquire additional water for the environment of an overallocated system."*

By partially restoring the Colorado River Delta, and more fully restoring Glen and Grand Canyons, 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.

Fifth, USBR must distribute Native American water rights settlements from, and subtract 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.

Sixth and finally, USBR must divide the water 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](#)¹¹. Thank you for considering our comments. Please reach out with any questions.



Gary Wockner, Director, Save The Colorado
970-218-8310
Gary@SaveTheColorado.org

Endnotes:

¹ <https://www.federalregister.gov/documents/2023/06/16/2023-12923/notice-of-intent-to-prepare-an-environmental-impact-statement-and-notice-to-solicit-comments-and>

² <https://www.usbr.gov/ColoradoRiverBasin/post2026/scoping/index.html>

³ See our comment letter in your pre-scoping report:
https://www.usbr.gov/ColoradoRiverBasin/post2026/documents/Post-2026_Pre-Scoping%20Comment%20Summary%20Final_Updated1.30.2023_508.pdf

⁴ The video we watched: <https://www.youtube-nocookie.com/embed/sNh7S9HOKE8>

⁵ Ibid, i.

⁶ We assume by “population” you mean “human population” as opposed to populations of non-human species.

⁷ <https://www.latimes.com/environment/story/2023-07-30/study-shows-how-warming-climate-is-sapping-the-colorado-river>

⁸ <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2022WR033454>

⁹

<http://www.riversimulator.org/Resources/ClimateDocs/TheColoradoRiverWaterCrisisItsOriginAndTheFuture2023Schmidt.pdf>

¹⁰ Ibid, ix.

¹¹ <http://savethecolorado.org/wp-content/uploads/2023/08/STC-CORIVER-DEIS-Scoping-Comments.pdf>