

**Letter #:** 420  
**Date Received:** 12/21/2022  
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**Subject:** Proposed SEIS Guidelines

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Dear Project Manager:

We've essentially drained the nation's two largest reservoirs because, despite all our Band-Aids, use remains far greater than what the Colorado River can now produce. We can finally do what it takes to keep the lakes functional, or we can lessen the pain, for now, and obliterate what little storage we have left.

No matter which future plays out, we must use less water.

I am not writing to just submit a cry for help. I offer some solutions:

The key is to get Lower Basin overuse under control. We must account for the structural losses - evaporation, attrition, waste, etc.

Then, we need to rewrite the rules governing releases from Glen Canyon Dam to protect Lake Powell from reaching critically low levels that, by forcing the use of the dam's lower outlet works, might threaten the structural integrity of the dam. We do this by setting a maximum release from Powell based on the current year inflow.

We need rules to cut far more deeply into Lower Basin water use, NOW - far deeper than current rules. They're just not sufficient. We have to include evaporation and system losses as part of each Lower Basin state's allocation.

I also would encourage the Bureau of Reclamation and National Park Service to consider the recreation interests of Lake Mead and Lake Powell. I support the BlueRibbon Coalition's Path to 3588' Plan as it will address low water levels in Lake Powell and Lake Mead. I hope BOR and NPS will include analysis of the economic importance of recreation in addition to feedback on power generation and water deliveries. Because there are so many variables affecting the lake's elevation such as precipitation, snowpack, runoff, release volumes, and other reservoir elevations the Bureau needs to consider changing the "target" elevation.

Section 6C and 6D of the 2007 Interim Guidelines is the critical first step.

This is where the current rules lay out how much water is to be released each year from Glen Canyon Dam. Note the quaintly anachronistic "Lake Powell Active Storage" column on the right, with "dead pool" - zero active storage - at elevation 3,370.

Start by adjusting this number to infrastructure. "Active storage" doesn't start until elevation 3,490, the level of the power plant intakes. Make 3,490 is the new dead pool.

That would mean that at elevation 3,525, rather than having 5.93 million acre feet of "active storage" - the amount of water above "dead pool" - we've really got less than 2 million acre feet of really actually usable, releasable water in Powell. The whole notion of "balancing" active storage in Mead and Powell, so central to

the '07 Guidelines, now has to look completely different.

When you get close to dead pool, you've got a "run of the river" system, which means that the only water that leaves a reservoir is the amount that comes in. Given that we're apparently redefining that for Powell on the fly, the new versions of 6C and 6D somehow have to restrict releases from Powell to not much more than comes in.

A simple approach to the new rule here might be rewrite the release rules when you're in the "Mid-Elevation Release Tier" (below 3,575) and the "Lower Elevation Release Tier" (below 3,525) to cap releases to inflow minus evaporation. That would set a sort ratchet that would prevent a further decline in Lake Powell below its current dangerously low levels.

We can cap Powell releases at the 24-month study's "minimum probable" unregulated Powell inflow level, with the option of raising the release an April review based on the "most probable" unregulated inflow. Minus evaporation. You have to subtract evaporation from that.

Cuts in section 2D of the Interim Guidelines would have to be rewritten, with Arizona, Nevada, and California taking a proportional share of system losses right off the top.

You can do this some really complicated ways, based on the distance downstream of each user's intake - so Imperial and Yuma would take a bigger system losses hit, and Las Vegas (pulling straight out of Lake Mead) would only suffer evaporative loss. Notably, this gets us to the 2 million acre of cuts needed.

This obviously doesn't touch the Upper Basin. The process Interior is using for this round of crisis management - a straight up revision to the '07 Guidelines - doesn't seem to offer a clear path to force the Upper Basin to come up with contributions of their own. Since the '07 Guidelines were signed, the Upper Basin has delivered more than 10 million acre feet of water above the required 8.25 million acre foot annual requirement. The key here is clearly to get Lower Basin overuse under control. We all have to contribute. A scheme for Upper Basin contributions involves the next wet year -forego some of the Upper Basin storage and get that water into Lake Powell instead.

Sincerely,

Jenny Pelt

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