

From: PENELOPE PURDY [p2purdy@msn.com]
Sent: Thursday, April 26, 2007 7:56 AM
To: strategies@lc.usbr.gov
Subject: Colorado River Draft EIS public comments

Attachments: Colorado River draft EIS comments 4.6.07.doc

Dear Dr. Fulp and Mr. Peterson,

Please include our group's remarks as part of the public comments on the Colorado River Draft EIS. Our comments are attached as a Microsoft Word file. Thank you.

Sincerely,

Penelope Purdy
Director, Clean Energy Programs
Western Business Coalition for New Energy Technologies
1625 Broadway Suite 950
Denver CO 80202
303-592-4066 (office)

Colorado River Draft EIS
Comments from the Western Business Council for New Energy Technologies

Penelope Purdy
Director, Clean Energy Programs
WBCNET
1625 Broadway Suite 950
Denver CO 80202
(303) 592-4066 (office)

Introduction

The U.S. Department of Interior and its bureaus and agencies deserve applause for tackling the very difficult issue of how the Colorado River Basin states should share the pain of future droughts. Government officials at the federal and state levels displayed the political courage by trying to resolve the potential resource conflicts before the next crisis arrives.

The Western Business Council for New Energy Technologies believes that economic prosperity and environmental protection go hand in hand. Our members work in Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming, which also are six of the seven Colorado River Interstate Compact states. For the American West, the proper use of water is fundamental to the concept of sustainable, environmentally responsible business.

In this regard, we are concerned that there are significant omissions in the U.S. Bureau of Reclamation's draft environmental impact statement of February 2007, dealing with the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lakes Powell and Mead.

Our overarching criticism is that the document is not forward-looking, but instead shows that the Bureau assumes climate conditions will remain more or less similar to ones found in the historical climate records. However, new scientific data prove the Bureau's assumption to be a risky one that could render the EIS' conclusions invalid, undermining the proposed alternative plans.

We are further concerned that the Bureau and the Western Area Power Administration have not considered the interplay of water supply and energy resources. Specifically, many states in the Colorado River drainage, including the lower basin states, continue to rely on, and are considering additional construction of, conventional coal-fired power plants, whose water demands are both large and inflexible. The increased energy demands for water from the Colorado River and other regional sources could reduce the region's ability to respond to changing water use patterns and climate conditions.

The Bureau itself has noted that doing nothing is unrealistic, as outlined in the No Action Alternative in Section 2.2. The Water Supply Alternative, detailed in Section 2.5, is similarly unacceptable because it only delays the inevitable need for the Bureau and the Basin states to make tough decisions.

Ultimately, we believe that a final record of decision should be based on the Conservation Before Shortage Alternative, as shown in Section 2.4. This alternative could be blended with the Basin States Alternative described in Section 2.3, which also acknowledges the need for better conservation of resources. Indeed, with the prospect of looming shortages, efficient water use is simply prudent business.

Climate change

The EIS fundamentally errs by not adequately considering how changing climate conditions will affect water supply and water use in the Colorado River basin. In Chapter 1, covering the EIS' Purpose and Need, the Bureau says that there will be no effect on climate change. In Chapter 3, the EIS also says that there will be no cumulative impacts. Both statements are wrong.

Only in Appendix N does the EIS discuss climate change in any depth. Even then, the document only considers data produced from tree rings and other past climate research. It does not discuss the numerous studies showing that future climate conditions may be much drier and hotter in the Southwest than they have been anytime in the past.

The dearth of discussion is surprising in an organization such as the Bureau, which prides itself on sound engineering and scientific principles.

The omission is especially puzzling because credible climate change studies are readily available in the public domain, such as *the U.S. Climate Change Research Program of 2002*. In spring 2007 the respected journal *Science* (Jian Lu & Seeger 2007) warned that future droughts associated with climate change will be unlike anything the region has previously experienced. Instead, droughts could become a near-permanent fixture in the Southwest. "It will be like a permanent 1930s or 1950s drought." (Seeger, quoted by reporter Katy Human, *the Denver Post*, April 6, 2007 p. 2B)

Arrayed against such warnings, it is inexcusable for the most important EIS on water shortages in our region to ignore the climate change issue.

Energy use

Energy policy is the proverbial elephant in the room regarding Western water supplies. Basin states have some of the fastest-growing populations in the country, with Nevada and Arizona among the top two. As the states' populations grow so will their demands for water and energy resources. Moreover, if the Southwest does, as predicted, enter into chronic drought conditions then demand for electricity likely will increase as more residents and businesses turn up their air conditioners.

Realistically, water policy cannot be separated from energy use. The Bureau, cooperating federal agencies such as WAPA and the governments of the Basin states clearly have a responsibility for determining energy resources and use patterns, so the EIS should analyze how their decisions on water use relate to their similarly important decisions regarding energy production and consumption.

We applaud efforts by some basin states to embrace alternative energy sources: Arizona has stepped up its use of solar and Colorado has boosted its commitment to wind power, for example. These projects will enable states to meet their energy needs without consuming large quantities of the arid region's limited water supplies.

By contrast, water devoted to coal-fired power plants will make it harder for water managers at the federal, state or local levels to also meet the demands of other industries

such as tourism, agriculture, light manufacturing and housing developments. Unlike tourism, agriculture and municipal use, water use by coal-fired power plants is inflexible unless the plants reduce their power output. Water use by coal plants thus represents a hard demand that is at odds with the need for flexibility in water supply from the Colorado River and non-system sources, as described in the Basin States and the Conservation before Shortage alternatives. The EIS should analyze whether the construction of new conventional coal-fired power plants in the Basin states will reduce the sought-after flexibility in water supplies.

There are many ways to make electricity: wind, solar, biomass and hydro, as the Bureau and WAPA have done for years. But in our arid region, there are only a limited number of places to find water for uses other than energy production, and even those supplies may be at risk as the climate changes. The EIS needs to reflect these realities.