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November 16, 1999

Mr. Dennis Underwood
Executive Assistant to the General
Manager, Colorado River Matters
Metropolitan Water District of
Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

RE: Salton Sea

Dear Mr. Underwood:

I spoke to you at the recent Colorado River conference in Keystone. I am particularly curious to know MWD's reaction to the enclosed summary of a proposal I intend to submit in response to the Salton Sea Project draft EIS. If my plan is feasible MWD will be the principal beneficiary.

More to the point of my sending the proposal to MWD for a look, the Bureau, and probably even SSA, are foreclosed from studying the proposal in the EIS process or in any other context because of a rider attached to the Interior Appropriations Bill by Rep. Hansen (R, UT). I have enclosed a copy. So far as I know, the rider survived.

If by some chance my proposal is reviewed, TetraTech and the SSA people informed me a while back that the draft EIS would be "open ended;" that is, there would be no preferred alternative and that further alternatives would be welcomed.

In my view, restoration of the Salton Sea is best approached by taking a fresh look at the whole Colorado River Basin, including the Glen Canyon Dam/Grand Canyon river dilemma, the river delta issue, the Upper Basin's perpetual nervousness about Lower Basin plans, and the truly overarching issue of actually obtaining more water for the Coastal Plain, Arizona, and Nevada.

Other than what is set forth in the proposal, I can think of some additional items that might appeal to both MWD and SDCWA in particular.

(1) Since there will have to be a desalination plant at Lake Cahuilla to keep the lake from reverting over time into another contaminated Salton Sea, perhaps this plant could be used to treat water headed to the Coastal Plain and thereby avoid the need for so much mixing of Colorado River water with supplies from northern California.

(2) The plan will obviate the need to get further into dual systems in the Coastal Plain for potable and non-potable water or other recycling efforts.

(3) Avoidance of a severe Coastal Plain "water diet."

IID will initially object violently to my plan, saying, in effect: "We will not substitute L.A. sewer water for our nice clean river water." Of course, treated effluent would be far cleaner than the water quality currently obtaining at Imperial Dam. But I understand the issue. I do know about absurdly stubborn irrigators. I practiced water law in Colorado for twenty years, including many irrigation to municipal transfers, and I served as a referee in the South Platte River water court. The IID irrigators will eventually come around. After all, they have only to shut off the pipe from the coast if the water quality is not in spec.

Thank you for your attention.

Very truly yours,

Steven M. Hannon

cc: Ms. Maureen Stapleton
Ms. Rita P. Pearson
Ms. Patricia Mulroy
Mr. Thomas J. Kirk, III
Mr. David Hayes
Ms. Mary Nichols
Sen. Dianne Feinstein
Sen. Barbara Boxer
Rep. Mary Bono
Rep. Duncan Hunter
Rep. Ken Calvert

SALTON SEA PROJECT

**Suggested Alternative for Inclusion in the
Environmental Impact Statement**

submitted by

Steven M. Hannon

November 16, 1999

Abstract. Proposals have been made to drain Powell Reservoir and decommission Glen Canyon Dam for active storage. The idea is principally driven by the need to restore and maintain a natural Colorado River ecosystem through Grand Canyon National Park, as such need was concluded in the Operation of Glen Canyon Dam, Final Environmental Impact Statement, March 1995, and as required by the Grand Canyon Protection Act of 1992, P.L. 102-575, and the National Park Service Organic Act, 16 U.S.C. Sec. 1 *et seq*; Sec. 221 *et seq*.

Other federal statutes, including the Endangered Species Act, mandate the restoration of some component of the natural hydrograph in the lower Colorado River and its delta region, including the Salton Sea. The elimination of Powell Reservoir will sufficiently alter the stream flows below Hoover Dam to accomplish these objectives.

The decommissioning of Glen Canyon Dam and the implementation of the suggested Salton Sea restoration and

operation proposal will also result in the following sources of water becoming available to the Lower Basin:

1. At minimum, 0.9 MAF currently lost annually at Powell Reservoir from evaporation and bank storage;
2. The contents of Powell Reservoir, 1.2 MAF to 0.8 MAF annually, as it becomes available during reservoir drawdown over twenty to thirty years.
3. The amount exchanged from Imperial Dam to the Colorado Aqueduct, matching the Coastal Plain return flows to IID.

Salton Sea Restoration Project. The draft EIS for the Salton Sea Restoration Project is expected to suggest as one of its alternatives a deferred, or long term, pump-out/pump-in scheme, involving a pipeline to either the Sea of Cortez or the Pacific Ocean. I offer a modification of the Pacific pipeline alternative to include the following key elements and considerations. No specific engineering details are presented.

1. The new idea. Following removal of the contaminated water from the Salton Sea, rather than the importation of sea water, as will be suggested in the draft EIS, treated wastewater from the MWD and SDCWA service areas will be returned in the pipeline for use by the Imperial Irrigation District. This water will be treated to meet or exceed the water quality now generally obtaining at Imperial Dam which presently contains discharges from dozens of communities and from recreational and agricultural activities throughout the Basin. The infusion of treated Coastal Plain effluent into the IID system will reduce the overall salt loading on the Sea from IID drain water and tail water. The

details of whether the Sea evacuation and refilling will be accomplished at once or incrementally in levied sections, and the availability of further recharge water delivery capacity in the All American Canal and the Colorado River Aqueduct, will be engineered to maximize efficiencies.

2. Initial Cleanup. The diversion of the Salton Sea to the Pacific Ocean will include the transmissible contents of the Sea floor. Whatever can be dislodged from the Sea floor by mechanical agitation will be slurried to the Pacific. The object is to obtain as "clean" a Salton Sea bed as is reasonably possible and to minimize remnant materials that are water soluble.

3. IID and CVWD. Both the Imperial Irrigation District and the Coachella Valley Water District may continue their historic irrigation practices, subject to ongoing conservation efforts and water transfer agreements in place or in the future, and with tail and drain waters continuing to discharge to the Sea. However, all discharges will be collected in a peripheral canal and delivered to a desalination facility adjacent to the Sea. The capacity of this facility will likely be approximately that of the existing Yuma plant.

4. Lake Cahuilla configuration. Following the temporary levying to clean and recharge the Sea, the final configuration will require a permanent dike to isolate the freshwater body from the desalination effluent repository. The dike will have to be constructed to withstand the maximum credible earthquake, in particular recognition of the Salton

Trough's proximity to the San Andreas Fault. The relative sizing of the freshwater Lake Cahuilla and the effluent basin will depend upon the selected lifespan of the facility, specifically the selected maximum salinity of the effluent basin.

5. System operation. Besides gathering return flows from agricultural water, Lake Cahuilla will be brought to its design elevation - its current elevation or some other selected elevation - by augmentation from the Colorado River, transported by available capacity in the Colorado River Aqueduct, with a lateral to the Lake, and the All American and Coachella Canals. I recognize that the IID system, and to some extent the CVWD system, operate in a "steady state" fashion with the All American Canal generally running at capacity year round. However, after the completed system is in operation and irrigators are receiving some portion of their needs through the pipeline from the Coastal Plain, there should be excess capacity in the canals to keep the Lake recharged with River water. The challenge is in engineering the original filling of the Lake without having to build a new canal that will not be needed for long term system operation.

The system will be "circular" in operation, with fully consumed water being continually replaced from the River, IID and CVWD tail water and drain flows, and ground water to maintain Lake Cahuilla at constant elevation. With its approximately 7.5 MAF capacity and covering an area of 380 square miles (less the volume devoted to the effluent basin), and with an average depth of thirty-one feet, constant recharge will be necessary to

maintain consistent wildlife habitat and adjacent property values and to promote recreational uses of the lake.

6. The Delta. A side benefit of the proposed scheme is that the Yuma plant, generally in disfavor because of its cost of operation but mainly because of its discharge to La Cienega de Santa Clara, may be retired. The changed River hydrograph from the drawdown and ultimate elimination of Powell Reservoir will guarantee the intermittent discharges the Delta historically required. In the final phase, some portion of the additional water that will be available in the River annually, as summarized in the Abstract above, may be sent to Mexico through the existing arrangement with the Mohawk-Welton diversions. While it will remain costly to operate (but not through government funding as described herein), perhaps some portion of the Yuma physical plant could be put to use at the Salton Sea.

7. Power. To provide the needed lifting and reverse osmosis pumping energy requirements under this plan, I encourage the construction of a solar energy facility, perhaps in the Chocolate Mountains that now serve as an aerial gunnery range. The Salton Trough region enjoys 350 days of intense annual sunshine.

8. The Powell Reservoir "insurance policy." Approximately one-quarter of the annual flow in the River is lost to evaporation at the Salton Sea, Mead Reservoir, and Powell Reservoir, with an additional significant amount lost to "bank storage" at Powell Reservoir. It is evident, even in advance of the Salton Sea Project EIS, that the Salton Sea must be retained

as a crucial link in the Pacific Flyway. For carry-over storage one of the big reservoirs must be retained. The issue of flood control is discussed in Paragraph 13.

My review of available River accounting data is that Powell Reservoir is unneeded to fully satisfy the requirements of the 1922 Compact except in the most extreme situation of prolonged drought in the River basin, such as occurred in the late Thirteenth Century. Balanced against this very remote circumstance is the very real, annual loss to the River of more than 900,000 AF through evaporation and bank storage in Powell Reservoir. This is a conservative estimate. At a minimum, as acknowledged by the Bureau of Reclamation, six MAF are currently in bank storage at Powell Reservoir. Other authorities postulate a much larger quantity. It is uncertain how much of this water would be recoverable as natural drainage back into Glen Canyon when the pressure of the reservoir is relieved. Nor is the rate of such return known. But whatever the amount or rate of return, it is "surplus" now lost to the system.

I suggest that the freshwater storage capacity in the restored Lake Cahuilla portion of the Salton Sea area, as suggested herein, would be more than adequate to meet the extreme drought contingency in the River basin, over and above the approximately 36 MAF of Basin storage capacity that exists apart from Powell Reservoir. Maintaining and operating a huge dam for active storage and a reservoir the size of Powell for this drought "insurance" is extreme belt-and-suspenders overkill. As was pointed out on numerous occasions at the recent Colorado

River Symposium in Keystone, and as underscored by Mr. David Hayes on behalf of the Secretary of the Interior, all the parties involved in the inevitable, long term, reallocation of this precious resource must accept some risk. It is impossible for everyone to have lawyer-driven, bulletproof protection, as the decades-long efforts to quantify the irrigation allocations under the 1931 Seven Party Agreement and the 1933 Compromise demonstrate.

9. Funding. Existing and imminent agreements for transfer of water from IID to Coastal Plain water users have established a minimum present value of future similar transactions. Accordingly, the minimum present value of the water saved by eliminating Powell Reservoir is at least \$180 million annually. By the same yardstick, the value of the water presently in storage in the reservoir is approximately \$4.8 billion. Certainly the Lower Basin water users should not object to paying for this water; rather they should be thankful that it can be made available, now and in the future, at any price.

In contrast, all the restoration schemes in the Salton Sea Project EIS will rely nearly entirely upon the usual mechanism of looking to the affected state and the federal governments for funding. I believe that the Congress would be more drawn to something like what I propose. Private sector economics and not Upper Basin/Lower Basin posturing and fears should drive the solution of the looming water crisis.

More details on funding. The project will require some time. Twenty to thirty years is likely. The reservoir drawdown, which

will incrementally save some portion of the present annual reservoir losses as well as the reservoir content itself, will largely be driven by the corresponding incremental increase in demand in the Lower Basin. This timing would also seem to match the necessarily slow transition of the Salton Sea to fresh water storage. How the scheme is implemented - the balancing of economics, water needs for both people and the environment, and construction of the necessary physical plant - is a political matter.

But the price for this water could be set at the outset: fixed at a present value with some escalator. With certainty of supply and payment by Lower Basin users, it seems that a long term payback of the initial cost of the pipelines, the desalination plant, the solar facilities, etc., either to government or private lenders, could be arranged.

Property value/tax base. A stable elevation, disease-free, toxin-free, freshwater Lake Cahuilla with its attendant recreation, fishery, and healthy Pacific Flyway components, to be drawn down only in the event of the most extreme drought contingency, will certainly promote an increase in land values and consequent tax revenues in the surrounding area. At the hearings for the Salton Sea Restoration Act, \$5.5 billion in increased value was suggested for only a partially restored Salton Sea.

10. The Boulder Canyon Project Act and Mead Reservoir.

There is nothing in the Act that specifically dedicates Mead Reservoir for the exclusive benefit of the Lower Basin. On the

contrary, the specification of reasons for the dam and reservoir as set for in Section 6 of the Act and the Interior Secretary's discretion in operating this structure - whose title is to "forever remain in the United States" - makes it as available to the Upper Basin as it is to the Lower Basin, excepting the five MAF dedicated to the Lower Basin under Article VIII of the Compact. The physical location of this federally-owned reservoir in the Lower Basin is irrelevant.

11. Wildlife and the environmental community. Creating a freshwater lake, no longer subject to continual creep back to the present degraded situation at the Salton Sea and not inhabited by exotic fish species prone to similarly exotic diseases, will provide the best overall and long-term habitat for wildlife. The environmental community would have to be pleased with a real fix - for the Salton Sea as well as for the River from Cataract Canyon to Mead Reservoir and from Hoover Dam to tidewater. A real fix will also dramatically curtail the inevitable legal challenges to band-aid proposals.

12. Indian water rights. The senior water rights of the Indian communities on the Lower Colorado must be faced up to. Even with some reallocation of the River's water, these rights are going to continue. The tribes have made it clear that their water is not for sale and will be leased only on short term bases. The Secretary of the Interior will eventually be forced to reduce all Boulder Canyon Project Act contract deliveries in order to meet the Tribes' needs.

13. A comment on flood control. Glen Canyon Dam must be able to contain or pass the maximum probable flood in the Upper Basin. It is worthwhile to note that the hydrological discharge area above Glen Canyon Dam is 108,000 square miles and between Glen and Hoover Dams the area is 59,000 square miles. Although it is often stated in justification for the dam and reservoir, Glen Canyon Dam is not a flood control structure. Since its authorization specified that it was to maximize electrical power, the Bureau has consistently interpreted the statute as requiring Powell to be maintained as full as nature will permit. Although the 1983 flood event somewhat chastened the Bureau's enthusiasm, the reservoir is still maintained at a level that, in my opinion, is dangerous - not just for the structure but for flood plain residents downstream of Hoover Dam.

The Bureau of Reclamation is not in the flood control business. Its job is to maximize power production and water storage. The present Compact-driven hysteria to store as much water as possible and the demands of the Western Area Power Administration place unrelenting pressure on the Bureau to keep the reservoir too full. A glance at the reservoir levels during the past few years of surplus demonstrate the point.

In the original design of the structure and in subsequent confirming reevaluations by the Bureau, the inflow design flood for Glen Canyon Dam, resulting from rainfall on top of snowmelt, is set at 29,060,000 AF over four months, with inflows peaking at 380,000 cfs. The Bureau has determined, in its 1990 Safety of Dams flood routing study (1990-SOD-AA), that this design flood

will be contained and passed without overtopping or otherwise causing damage to the structure. However, this conclusion is entirely dependent upon the river outlet works, the power conduits and, most importantly, the spillways, operating perfectly, at full capacity, for nearly all of the four months. In 1983 the crucial spillways failed in a matter of a few days at flows only a fraction of their design capacities. The Bureau repaired the spillways, made a modification that is claimed to solve the cavitation damage deficiency in the spillway design, and has declared the tunnels capable of operating at full capacity. If it ever turns out that the Bureau is, once again, wrong, the loss of life and the scores of billions in property damage, from Hoover Dam to tidewater, is unthinkable. A small risk? An "acceptable" risk? Acceptable to whom?

It should be fully realized that a tiny handful of engineers and managers at the Bureau's Technical Service Center in Denver are making this determination -- a determination that is, in many respects, entirely subjective. It should also be noted that the Bureau is self regulating. There is no agency that oversees its dam safety conclusions.

The flood events of 1983 and 1984 are minuscule in comparison to Glen's 29 MAF inflow design flood: the "Big One." The only dedicated flood control capacity behind the two big dams on the Colorado is the five MAF in Mead Reservoir. Obviously, the great bulk of the 29 MAF design flood will be "passed," as the Bureau describes the situation -- passed downstream of Hoover. In 1983 the release from Hoover was kept below 40,000 cfs. The

destruction from releases in excess of 300,000 cfs cannot even be imagined.

The draining of the unneeded Powell Reservoir and retention of Glen Canyon Dam to fully and absolutely contain the design flood without resort to questionable spillways and without having to pass flood flows would fully secure the lives and infrastructure in the Lower Basin river corridor, including the substantial investment in - and daily need for - the Lower Basin water users' diversion structures, from Mead Reservoir to Morelos Dam. The only issue that would remain is the ability of Mead Reservoir to contain a large flood occurring in the capture area between Glen and Hoover Dams.

In flood-control-only mode, the power plant at Glen Canyon would have to be removed and gated conduits would have to be installed in the base of the dam to pass normal river flows.

14. Comments on other issues associated with draining Powell Reservoir. These are entirely political issues: balancing the unquestioned need for more water in the Lower Basin against the concomitant losses and readjustments in other resources and economic benefits that will be unavoidable with the elimination of Powell Reservoir. But the balancing of gaining additional water supplies against losing power production and recreational value is not simply a matter of economics. Now and for the foreseeable future, fresh water availability in the Lower Basin is finite and irreplaceable. The competing resources are not.

(a) *Minimum power pool requirements.* Implementation of the suggested plan will result in reduced power pools at reservoirs

in the Upper Basin during times of extreme drought. Increased coal-fired power production and conservation will have to make up the difference. Energy "waste" is probably more of an issue right now than is water "waste." The need to light up the Las Vegas Strip so that it is visible from the moon and the need to pump hundreds of thousands of acre feet of water over several Sonoran Desert mountain ranges in order to grow cotton in the desert must be reviewed. The states of Nevada and Arizona are going to have to take a hard look at their priorities.

Viewed solely economically, the dollar value of the water presently lost at Powell Reservoir exceeds by many fold the value of the power that will be lost at Glen Canyon Dam and at the remaining Basin reservoirs during times of extreme drought.

(b) *Accelerated siltation of Mead Reservoir.* Whether Mead Reservoir silts in over 600 years or 300 years is a matter of purely academic concern. In 300 years we will certainly not be producing power with mechanical turbines; nor will there be any need to transport sweet water over long distances from natural sources to users in coastal areas. Again, this issue must be balanced against the real-and-now task, starting now and extending an unknown time into the next 300 years, of finding additional wet water for the Lower Basin.

(c) *Recreation value of Powell Reservoir.* It is reported that perhaps three million people visit the reservoir annually. But the number of individual visitors who actually recreationally use the reservoir, with repeat visits during a year, is a much smaller number. Opponents of draining the reservoir argue that

the resulting 180 miles of river through Glen Canyon would support a much decreased recreation volume. There is currently no study available on this subject, but the experience of the past nineteen years at Mount St. Helens is instructive. Since the most beautiful area in the Pacific Northwest was reduced to, and remains, a moonscape, visitation has remained multiples of what it was before the eruption. There has been a similar if lesser experience at Yellowstone NP since the fire. Unquestionably, Nature on the mend is a powerful draw. Glen Canyon was, and is, known world wide.

Across the western United States there are many reservoirs to boat and fish on, but there is only one Grand Canyon and its ecologically-connected neighbor, Glen Canyon. River rafting through the park is now at maximum capacity - a situation driven by the steadily diminishing camp sites because of the eroding beaches - yet demand continues to grow, dramatically. Private boating parties now must wait nine or ten years for a permit during high season. Glen Canyon would provide hugely more rafting opportunity than does the Grand Canyon because of its vastly increased riverine camping environments. Additionally, hundreds of miles of side canyons would be available.

A freshwater Lake Cahuilla (300+ square miles) would make up for much of the boating and fishing lost at Powell (252 square miles) and it would be available to the Coastal Plain population that is increasingly deprived of quality outdoor experience close at hand. As with the other peripheral issues, this recreational

adjustment will have to be balanced against the overarching need for water.

15. Amending the Compact. Long term, beyond the twenty to thirty year reservoir drawdown transition period, the Lower Basin will receive an infusion of at least 900,000 AF of real water annually, provided at fair market value. During the twenty to thirty year transition phase the Lower Basin will also be getting the water presently in the reservoir, with the drawdown engineered to meet the actual needs downstream, human and environmental, as well as accommodating the dam modification mechanics and accumulated silt management.

The Upper Basin must get something in return.

The Upper Basin states will view the water in Powell Reservoir as their property just as the Lower Basin states similarly see the water in Mead Reservoir. These provincial views, with no clear provisions or judicial rulings in the "Law of the River" to support them, will have to be abandoned to achieve a Basin-wide solution to the looming crisis. With Powell Reservoir gone, the Upper Basin will not get any additional real water and it will not get any money, but it must receive something at least as important as more water and infinitely more important than money: legal protection of its real share of the annual water supply in the Upper Basin and where it is available for use by the Upper Basin.

The 1922 Colorado River Compact contains a universally recognized fiction and a wholesale absurdity. Respectively, they are (1) the River does not produce 15 MAF annually, and (2) the Upper Basin having to guarantee any amount of water, much less the erroneous 7.5 MAF annually or 75 MAF in a ten-year running aggregate, to downstream desert communities is nothing less than ludicrous. I suggest that in consideration of the wet water windfall that draining Powell Reservoir will provide to the Lower Basin, the Compact should be amended so that the River basins simply share whatever Nature decides to put into the River. The Lower Basin gets its needed water and the Upper Basin gets off the Compact hook: no "calls" on the Upper Basin. This is just another way of looking at the "sharing of the risk" realization that is dawning on all River users, particularly those in the Lower Basin. Much has been made of the unavoidable "reallocation" of the River: to protect the environment, to recognize the unrelenting demand of the Lower Basin populations for more water, and to provide for the Indian tribes' senior water rights. To deal with the water demand reality that the Compact commissioners could not have remotely anticipated, the document will have to be amended.

Article 1 of the Compact provides, in part:

"To these ends, the Colorado River Basin is divided into two Basins, and an apportionment of the use of part of the water of the Colorado River System is made to each of them with the provision that *further equitable apportionment may be made.*" (emphasis added).

16. A note about water "need." In the event of a prolonged severe drought, it seems that there should be a more

rational priority for water use other than the draconian priority system. As for private use of strictly private water, probably nothing can (or should) be done. But for water provided under contract with the federal government it is worthwhile to mention the following.

From the headwaters of the Green River in Wyoming and the Colorado River in its namesake state, to the Mexicali Valley, 75% of the "beneficially" used water in the Colorado River Basin is used to grow some variety of grass to feed cattle. While agricultural water users in Colorado, Wyoming, and Utah may justifiably argue that grass is about the only thing they can use water for, the argument should not obtain in the Imperial Valley. The entire diversion through the Colorado River Aqueduct for the benefit of the Metropolitan Water District's sixteen or so million customers in the Coastal Plain, even including the current supra-Compact surplus diversions, is far more than eclipsed by that diverted through the All American Canal to grow cow food by less than 600 growers in the Imperial Valley. And the growers receive the ultimate subsidy: there is no fee at all for the water they are now selling for \$200+ per acre foot.

Fodder farmers and cattle ranchers have long maintained that most urban water is wasted. From a strictly economic standpoint, I would like to see a comparison of the net benefit conferred, in property valuation, by means of urban landscape irrigation and swimming pool filling, to the product value conferred by spreading water across a desert to raise cow food. So water-inefficient is western cattle fodder production that more beef

cattle are raised in western Iowa than on all the several hundreds of millions of acres of public lands in the eleven western states (ref. USDA Agricultural Statistics Service). The world's rainfall does not uniformly bless the "right" to raise cow food.

We do need cattle fodder. But with a drought in the River basin it seems inappropriate to federally subsidize highly consumptive alfalfa farming while urban users are forced to do without. At least with respect to contract water in the Lower Basin, it should be recognized that the right to farm as one pleases has to be balanced against the reality of where the farming occurs and where the water comes from.

Conclusion. It is past time for some "further equitable apportionment" in the Compact. The suggested small change in the Compact is just one of the components of the necessary reallocation to make the most efficient use of the Southwest's lifeline for both its people and its wildlife.

Hand-wringing lawyers will find countless reasons to say "no." Saying "yes" to anything always involves some risk and generally some effort. It is infinitely easier and safer to say "no" and avoid having to do anything. Similarly, a number of western politicians will say that what I propose is not possible, it is "radical" and therefore bad, and that nothing should ever be done about outdated water law that is demonstrably based upon errors. Even the remotest questioning of Nineteenth Century western irrigation practices, and their accompanying "traditions" and "ways of life," will be looked upon as unthinkable.

My state's Senator Ben Nighthorse Campbell announced that draining Powell Reservoir "is the stupidest idea I have ever heard of." Senator Campbell does not have to plan for the water needs of scores of millions of people, people who do not individually own hundreds or even thousands of acres of federally subsidized irrigated farmland.

Such is the fear of any change that a statute was enacted this year that prohibits any federal agency from even studying the proposal to decommission Glen Canyon dam for active storage - no matter the reason for the decommissioning.

Please try to rise above these easy avoidance mechanisms, these archaic water use assumptions, and these wholly uninformed, knee-jerk political actions.

Respectfully submitted,

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