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May 1, 2020

Lower Colorado Regional Office
Bureau of Reclamation
PO Box 61470
Boulder City NV 89006-1470
Phone: (702) 293-8000

Re: 7D Review of 2007 Interim Guidelines

Submitted via email to: 7dreview@usbr.gov

Dear water managers of the Colorado River Basin:

Living Rivers and Colorado Riverkeeper present this comment letter for 7D review of 2007 Interim Guidelines (the Guidelines) for the Colorado River Basin (CRB) as explained in Section 7 of *Updated Draft Guidelines of December 10, 2007*.

We want to thank you for providing this opportunity to participate in this important topic and we look forward to working with you in the years ahead as the Guidelines are formally revised by 2026. We understand the purpose of the 7D Review is to take a hard look at the performance of the Guidelines from 2008 to 2020.

For the development of the Environmental Impact Statement (EIS) for the Guidelines by Bureau of Reclamation (Reclamation), Living Rivers completed the following tasks to maintain our position as a stakeholder:

1. 2005, July - attended public scoping meetings and delivered scoping comments.
2. 2005, November - organized 144 citizen groups to sign-on to these comments.
3. 2007, April - provided comments for Draft EIS with Center for Biological Diversity.

Our primary position during those formative years was: Reservoirs Mead and Powell will fall to empty in either the 2020s or the 2030s, with or without remedies to curtail shortage declarations. We provided a water budget analysis and cited appropriate documents from the science community.

By 2014 it became self-evident that hydropower production might cease and conversations to modify the Guidelines did begin and emerged as a process called Drought Contingency Planning, which were formalized in 2019.

We have the following observations to present for your consideration:

1. Studies of the CRB underestimated the science of hydrology and the social science of climate adaptation. The best advice was provided by Scripps Institute in 1983 (*Carbon Dioxide Exchange Between Atmosphere and Ocean and the Question of an Increase of Atmospheric CO₂, during the Past Decades*), National Academy of Sciences in 2007 (*Colorado River Basin Water Management: Evaluating and Adjusting to Hydroclimatic Variability*) and Scripps Institute in 2008 (*When will Lake Mead go dry?*).
2. At the end of Year 2008, it was clear that business-as-usual was at play. The basin expressed too much wishful thinking that positive El Nino cycles would recover the reservoirs. The oscillations of the Pacific and Atlantic Oceans are changing and this bodes increasing variability. The behaviors of cyclones, monsoons and atmospheric rivers are also changing.

We understand that comments may be received after May 1st and we may provide additional comments in the near future. Thank you for your kind attention.

Sincerely yours,

John Weisheit
Co-founder