

>>> "Stacey Hamburg" <shambu@myway.com> 04/27/07 11:15AM >>>

Mr. Rick Gold
Regional Director, Bureau of Reclamation Upper Colorado Region
Attn: UC-402
125 South state St
Salt Lake City, Utah 84138-1147

Dear Mr. Gold,

I applaud the Bureau's acknowledgment of the critical water problems for the people of the southwest in the face of continuing long-term drought as well as the efforts to devise a strategy to deal with the problem.

Of the four alternatives listed in the DEIS, Conservation before Shortage provides the best solution for providing for the water and electricity needs of the southwest cities while also protecting the Colorado's riverine ecosystem.

A particularly attractive feature of Conservation Before Shortage that is not included in the Basin States Alternative is that users who give up water in response to a conservation trigger are compensated. The Basin States alternative does not provide such compensation but strictly follows first in time, first in right western water law. This feature of Conservation Before Shortage is attractive for its obvious fairness and is particularly meaningful in that it alters the traditional way of dealing with water shortage in the West.

There are significant potential advantages to the use of voluntary, market-based conservation as an alternative to and as a means of mitigating against involuntary shortages.

In addition, in the Conservation Before Shortage Alternative, Mexico is allowed to participate in the ICS. That is Mexico can create surplus and bank it in Mead. This feature has many beneficial possibilities for the Delta. Initial indications are that all the potential players, including the powers in Mexico, find the potential attractive.

- Based on extensive modeling performed for the Lower Basin states, reductions of 400,000, 500,000 and 600,000 acre-feet at Lake Mead elevations 1075 feet, 1050 feet and 1025 feet, respectively, appear to provide optimal results in preventing larger involuntary shortages that perform better than the 200,000, 400,000, and 600,000 acre-foot reductions proposed in the original CBS proposal.

- It is desirable to protect the elevation of Lake Mead at no less than 1000 feet under any condition to protect Southern Nevada Water Authority's lower intake structures, as well as the new minimum power pool if proposed low-pressure turbines are installed at Hoover Dam.

- It is preferable for Lower Basin water users to voluntarily engage in predictable, small-scale reductions in use – and receive compensation for those reductions – rather than face large-scale, involuntary and uncompensated disruptions in water deliveries that could cut into municipal and agricultural water supplies and create unmitigated economic impacts.
- There is a large volume of Colorado River water which could be temporarily conserved through voluntary, market-based mechanisms such as part-year fallowing or forbearance agreements, dry year options, or other similar arrangements to reduce Lower Basin consumptive use on an occasional, temporary basis as an alternative to involuntary shortages to low-priority users.
- Users of Colorado River water in Mexico may wish to participate in short-term, voluntary and compensated conservation agreements, to reduce the probability of larger, uncompensated future reductions due to a declaration of shortage under the 1944 Treaty with Mexico.

For the reasons listed above, I urge the Bureau to adopt the Conservation before Shortage Alternative as the preferred alternative.

Thank you.

Stacey Hamburg
1550 N Fort Valley #19
Flagstaff, AZ 86001