

DROA Plan Framework

Comments received by <u>droa@usbr.gov</u> during public review period (Jan. 28-Feb. 17, 2022)

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One PDF Letter from BlueRibbon Coalition / Sharetrails

A PDF letter was received from BlueRibbon Coalition / Sharetrails with the content shown below. Dear Mr. Henrie,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Upper Colorado Basin Drought Response Plan. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use byworking collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, boats, horses, mountain bikes, and hiking to enjoy federally managed lands and waters throughout the United States, including those of the Lake Powell area. Many of our members and supporters live in the Upper Basin area or travel across the country to visit these states and recreate on these lands and waters. BRC members visit Lake Powell for recreation, sightseeing, bouldering, photography, rockhounding, fishing, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. We would like to add our support to any comment submitted by any individuals or organizations that advocate for continued use. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future. We support any comments made by our members.

Plan Specific Feedback

The economic benefits of Lake Powell and other reservoirs should be taken into serious consideration. According to Boating and Marine Industry Statistics, in 2019 alone, the sales of boats and marine products is about \$42 billion¹. This does not include lodging, maintenance, food and travel expenses. The marine recreation industry is a powerful force that sustains many local economies such as Page, AZ and Hanksville, UT. The National Park Service estimated that Glen Canyon provided a staggering economic benefit of \$525 million to the surrounding communities in 2019.²

¹ https://www.nmma.org/statistics

² https://www.nps.gov/glca/learn/news/06242020.htm

Comparatively, the economic value of power generation by the dam is estimated at \$153 million. Clearly the recreation value of the Lake has eclipsed the economic value of the other

uses, and this economic impact should play a stronger role in informing target elevation levels. The Upper Basin Drought Response Plan needs to account for the damage to economic income due to the current "target" elevation. The target elevation of 3,525 is still too low for several boat launches and marinas to function normally therefore causing major impact to these communities.

BlueRibbon Coalition recommends increasing the "target" elevation to 3,588 ft. As this will still allow forthe generation of hydroelectric power but also allow for recreational use and not devastate local economies. In times of drought and uncertainty when the water levels are getting close to "target" elevation "experimental releases" should be postponed as they are not necessary to the primary purposes of Lake Powell to provide domestic and agricultural water.

The 2016 Long-Term Experimental and Management Plan describes Alternative D that was selected as the most "environmentally" friendly and includes many new downstream experiments. It is irresponsible conduct such experiments and increase water releases in years of extreme drought as we have seen from 2012-2020. In the Draft, line 276 states, "LTEMP expressly provides for modifications for Glen Canyon Dam monthly releases to respond to low reservoir conditions as a result of drought in the Colorado River Basin". Monthly releases need to be re-evaluated as we are nearing dead pool. Not only would reaching an elevation of 3,490 be harmful to the recreation community but would be catastrophic for the hydroelectric power.

Conclusion

We would like to close by saying we support "shared use". As long as overall visitation numbers are appropriate for the affected resources, users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, recreation use often overlaps with activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Ben Burr BlueRibbon Coalition Sincerely,

B P

Ben Burr Executive Director BlueRibbon Coalition

Jue Gob

Simone Griffin Policy Director BlueRibbon Coalition

Three Emails – Statements that DROA is not sufficient

Hi Robert,

I would like to share my thoughts on the recently released Colorado River Drought Operations Contingency Plan as a native Utahn, a state and federal taxpayer and a Colorado River user. I read through the document and, to be honest, was surprised at what I did not find.

I was looking for some critical insights or a couple of constructive suggestions that would help address the long term aridification that is impacting and will continue to impact the Colorado River Basin well into the future.

The best insight that I saw in the draft plan was Section 5.3 on Effectiveness; specifically the comment that the whole plan may be futile:

452. "If dry conditions persist or worsen, available storage volumes for potential adjustments or releases may be insufficient to protect the

453. Target Elevation at Lake Powell. As such, Drought Response Operations may be ineffective and therefore futile.".

Well, shucks, we know that dry conditions are going to persist and worsen, so it sure seems that the management team responsible here is, in effect, giving up without a real fight.

Please correct me if I missed some specific action beyond praying for climate change to reverse itself. Draining the upstream reservoirs is not going to save power generation at Lake Powell. Full stop.

Through many decades of business experience, I have learned that if one raises an objection, one should provide a reasonable alternative so here is mine. First, I suggest that the Bureau of Reclamation admit that the Colorado River Basin is drying up and that there will not be enough water to keep all the reservoirs full every year. There will clearly be some good water years and having some working turbines at Lake Powell to be used in good years makes business sense. In the meantime, draining the high elevation reservoirs where evaporation is lower and storing it at a hotter, lower elevation is not going to solve the Upper Basin water and power generation shortage.

Second, let's address the issue that we, as a powerful society, can certainly address which is reliably replacing the lost hydropower from Glen Canyon Dam. Advances in power technology have made building renewable energy generation and storage facilities connected to the Glen Canyon Power Grid a real economic opportunity for Utah and other Colorado River Basin states.

There are literally billions of dollars being proposed to help states address various economic and environmental challenges. By disconnecting the management of the Colorado River from the power needs of the Western economy, which is exactly what Mother Nature has already decided to do, then the Bureau of Reclamation and its partners can regain control of the situation and replace the renewable hydropower that my generation (I remember when Glen Canyon was built) was able to enjoy with a clean, cost effective renewable energy source that multiple future generations can enjoy despite the long term aridification.

The opportunities to reuse the Glen Canyon power grid (while allowing for the occasional gifts of extra hydropower - I remember 1983 very well) is a wonderful employment opportunity for Utahns and a smart civic investment.

I hope that your team will give some serious consideration to this constructive suggestion and demonstrate great leadership on this issue going forward.

Best regards,

Craig Wallentine

Dear Mr. Henrie,

I would like to submit this in comment on the Draft Upper Basin Drought Response Operations Plan.

As a scientist, I don't envy USBR's situation with Glen Canyon Dam, but I'm sure you all know that this is the planning equivalent of whistling in the dark. The problem is a lack of water, not storage. This is anticipated to continue for the indefinite long term future, which the Bureau's plan blithely ignores. In fact, it ignores a remarkable number of very important factors.

As just one example, the obvious response of upper basin residents to the drought is going to be measures to retain water in situ to use locally, thereby significantly reducing the runoff that flows into the Colorado River and tributaries. Juggling water storage distribution and other proposed solutions will be largely irrelevant and ineffectual. The Bureau has no way to affect this and many other critical considerations.

What the situation needs is something far more comprehensive that includes many more parties of interest that are willing to sacrifice some of that interest for the good of all. Considering what we have seen so far, the likelihood of that seems even less that the probability of bountiful sustained rainfall.

Therefore the proposed measures are essentially a waste of time, effort and money. You might as well pray for rain.

Good luck.

Paul Huddy

Dear Mr. Henrie,

Thank you for the opportunity to comment on the Draft Upper Basin Drought Response Operations Plan.

I am a climate scientist at the National Center for Atmospheric Research in Boulder, Colorado. The recent warming and drying of the Southwest are consistent with what climate models have predicted and are unlikely to reverse in the next few decades. Rather, water shortages are likely to worsen, especially if we fail to meet the goals of the Paris Climate Agreement.

The measures outlined in the DROA draft do not adequately address the long-term challenges posed on the Colorado River by ongoing climate change. The DROA plans only discuss increasing releases from

upstream reservoirs and slowing the releases from Glen Canyon Dam. The plan recognizes that these efforts may be "ineffective and therefore futile" if "dry conditions persist or worsen."

I urge you to take a long-term view that recognizes the impact of climate change, prepares for low-water years, and considers the needs of all stakeholders. Given that Lake Powell is approaching dead pool, I hope you will consider the eventual phasing out of Lake Powell as a reservoir. Storage could be consolidated in Lake Mead, opening more of Glen Canyon for restoration.

Thank you for your consideration.

Sincerely,

William Lipscomb

One Email - Operate for human/ecological health in lieu of economy/electricity

To whom it may concern:

As a young resident of Southern Utah and as a boatman on the Green and Colorado Rivers, including through Grand Canyon, I wanted to voice my beliefs that we really are in crisis mode with water right now, which you all are aware. I want to implore decision makers to value the long-term ecological implications of water management decisions over economic or electrical imperatives. Thinking about my life and my future, the only hope I see in the West is maintaining the ecological integrity of river corridors, and I want to see Lake Powell managed for sedimentation and making sure there is healthy water and a livable future in 20 years for young Westerners like myself. I would rather accept power outages and economic consequences now than having to move because there is no water in 15 years or see the canyon and river corridor ecosystems damaged. Healthy ecosystems are our only chance at "recovery" and ever being able to return the water we are "borrowing" from the lower basin states right now. In sum, I hope decisions makers move away from economic considerations and we should all be divesting from electricity produced at Glen Canyon Dam, and the Dam should be managed for human and ecological health instead.

Thank you,

Phoebe Brown,

692 Emails – Form letter re: fill Lake Powell

Received from with subject line "Fill Lake Powell!" and content shown below. Some of the emails had a modified content, or additional information such as recounting good recreating experiences and memories.

Dear Mr. Henrie:

I enjoy recreating on public lands and waters and believe Lake Powell provides a unique recreation experience and is valuable for a number of reasons. I am writing in regards to the Upper Colorado Basin Draft Drought Response Operations Plan and appreciate the opportunity to provide feedback for this critical body of water.

I am aware the "target" elevation is 3,525 feet and the minimum elevation to operate the hydropower, or power pool, is 3,490. Although 3,525 allows you to continue to run hydro powers operation it does not allow for continued recreation operations. We have seen numerous closures of marinas and facilities throughout Lake Powell in recent years.

As you develop the hydrology plan and the operational proposals the bureau needs to put a large emphasis on the importance on maintaining proper water elevation levels in Lake Powell. A 35 ft buffer simply might not be enough of a buffer. Because there are so many variables effecting the lake's elevation such as precipitation, snowpack, runoff and other reservoir elevations the bureau needs to consider changing the "target" elevation. Once the lake gets to the target elevation, because of the numerous variables it could be too late to keep the hydrology operations going. In not only maintaining the "target" elevation but looking to increase it, it will benefit the other units as identified in the Colorado Storage Project Act. I think 3588 feet is a better target elevation for the lake.

Not only would losing the hydroelectric power be hugely problematic, but the economic activity lost due to decreasing water levels is devastating. Local economies should be able to benefit from the recreational opportunities that come from Lake Powell. As launch ramps and marinas close due to water levels, businesses are hurt and economic losses impact the entire region surrounding the Lake.

While maintaining Lake Powell at higher elevation levels will require tradeoffs elsewhere in the Colorado Basin, Lake Powell should be given preferential treatment. It is a national treasure for outdoor recreation, vitally important for local economies, the reservoir and dam provide clean energy and water certainty for downstream users.

Please Fill Lake Powell!

Sincerely,

Hannah Cook

Six Emails – Fill Lake Powell (not form letter)

Dear Mr. Henrie,

Thank you for the opportunity to respond to the Drought Response Operations Plan Draft. I wish this had been done years ago, when there was more water in Powell. Your target water elevation of 3525 is too low, and now Powell is at a critical level. For all the recreation that happens at Powell, this drought has put a great deal of stress on NPS and Marinas to keep access open. Right now, Powell is only 4 feet away from 3525, and dropping a foot per week. The spring runoff is about 12 weeks out. It's going to keep dropping, and go past 3525.

I'm sure you're aware of the economic benefit of the recreation industry at Lake Powell. In 2019, it was one of the most lucrative of the National Parks system, and I believe the leading National Recreation Area in 2020.

www.nps.gov/glca/learn/news/06242020.htm?fbclid=IwAR1jzUZyG_4mLritdDKDkxYVEP6pbN7FjZ9 Q5I8P99dXns6pHZTlq-rLQt0

Tourism created \$502.7 million in Economic Benefits in 2019 - Glen Canyo...

Tourism to Glen Canyon National Recreation Area and Rainbow Bridge National Monument created \$502.7 million in E...

Don't count on a huge runoff this spring either. With the La Nina pattern, there's not going to be much. The lake only came up three feet last year. I'll be interested to see how much this spring's runoff will bring. Counting on the upstream lakes to "prop up" Powell is also unrealistic. Really no discernible difference in elevation with the upstream releases that happened in the fall--it just slowed the drop. I'm afraid this pattern will effectively drain all the Upper Basin reservoirs in the near future.

lakepowell.water-data.com

What really needs to happen is a stricter drought response. In order to keep Powell's level steady is to match the outflow of Glen Canyon Dam to the lake's inflow--for as long as it takes. It's too bad that a 100-year old Compact is still controlling Powell's releases. To release 7.48 million acre feet for Water Year 2022 is irresponsible. Powell will continue to drop. It will be very difficult to try to keep it at 3525, your target elevation. In times of extreme drought, extreme measures are needed.

Keep more water in Powell. I've been going to Powell since 1984. I've seen it from full, to the pitiful state it's in now. I sure hope that a massive spring algae bloom does not spread lake-wide with as shallow as Powell has become.

Decisions about managing this amazing resource need to be based on common sense--not politics.

Sincerely,

Tiffany Mapel

Dear Mr. Henrie:

We are a family that has been houseboating on Lake Powell for 30 years. We are now three generations waiting on the fourth, our great grandchildren. Our time share at Lake Powell is our annual family vacation and is the most important week of our year.

We plead with you to preserve this treasure for our sake and the millions of visitors from around the world who come to see and experience this water wonder world. It is, after all, the water that enables the access and reflects the majesty of these ancient canyons.

Our president's mission to build-back-better logically includes preserving the best of what we have. We don't have to build anything; just don't drain it.

Sincerely,

CRAIG TAYLOR

Dear Mr. Henrie:

I am contacting you today as a Master of Accounting student here in Utah who has visited Lake Powell every year since I was 1 year old.

Lake Powell is such a special place for so many people. My youngest memories that I have are from Lake Powell when we would have family reunions there as a child. Lake Powell is the place where anyone can go with friends or strangers and just forget about all of the worries of regular life.

Please fill Lake Powell so that our children and grandchildren can enjoy all of of the joy and happiness that Lake Powell brings to people each year.

Sincerely,

Brayden Murphy

Dear Mr. Henrie:

I live along the Colorado River basin system and use and recreate on several of the reservoirs along the river system. Me and my family have been enjoying recreation at Lake Powell for three generations now. We have become increasingly alarmed by the lack of control and planning in maintaining the water level of Lake Powell. For many years the outflow plan has exceeded the in flows by a large margin and the plan in place is based on water data from many many years ago. A common sense and realistic approach must be enacted to manage future outflows of Lake Powell. Such a plan must include measures to match outgoing water with the current inflows since we are wholly at the mercy of nature in how water and snow we receive.

We urge you to raise the target level of the Lake to a point where the millions of people who recreate on Lake Powell may continue to do so along with responsible outflows for electricity generation and water use down river.

Please take action to restore the water levels of Lake Powell for our future use. Thank you

Sincerely,

Brandon Anderson

Dear Mr. Henrie:

I live two hours away from Lake Powell with my family. We have been recreating at Lake Powell but fishing every spring, summer and fall for the past 20 years. We love taking our kids out and teaching them they can catch their own dinner, playing in the water when it's warm enough and just enjoying the beauty of such a peaceful place. Given we live in such a rural area, We feel very blessed to have Lake Powell as such a close option to our home. We would be devastated along with many others if we didn't have the opportunity to continue our family traditions and use the lake as we have been for years.

Sincerely,

Mandy Brown



Dear Mr. Henrie:

Although I enjoy Lake Powell on a personal level as an owner of a houseboat & other recreational vehicles, I also realize how important it is as a resource. Even on the Navajo Reservation the lowering of Lake Powell has affected their aquifers and many water wells that the Navajo people depend on for themselves & their livestock, it's a fact that the lake changed things for the better and we have built infrastructure that relies heavily on it!

You cannot allow it to fail now.

It's too important and many people & industries rely on it, including Lake Mead.

Please Fill Lake Powell!

Sincerely,

Joy Howell

55 Emails – Form letter re: Consolidate storage in Lake Mead

Most of the 55 form letter emails were as shown below. Some were modified by the sender and contained a portion of the content shown below or modified content.

Dear Mr. Henrie,

Thank you for the opportunity to comment on the Draft Upper Basin Drought Response Operations Plan.

Unfortunately, the measures outlined in the DROA draft do not properly address the challenges that climate change is imposing on the Colorado River or the big picture problems facing the river in Glen Canyon and Grand Canyon. The DROA plans only discuss increasing releases from upstream reservoirs, and slowing releases from Glen Canyon Dam. The plan's own wording recognizes these efforts may be "ineffective and therefore futile" (line 455) if "dry conditions persist or worsen."

Every single climate study that focuses on the Colorado River suggests arid conditions will indeed persist and worsen, so why aren't we planning as such?

We need drought planning that:

- -Acknowledges the impact of climate change on the Colorado River, not mentioned once in this draft
- -Prepares for future low water years
- -Focuses on realistic, long-term solutions
- -Provides a framework for stakeholders to discuss a diverse array of options
- -Considers the eventual phasing out of Lake Powell as a reservoir

Based on the best available data from climate scientists, academics, and even the Bureau of Reclamation's 5-year probabilistic projection, the possibility of Lake Powell dropping below power pool and even nearing dead pool in the coming years is very real.

As the Upper Basin prepares to sacrifice upstream reservoirs to buffer a failing Lake Powell, this plan should consider alternatives that look beyond that paradigm, and consolidate storage in Lake Mead. If Powell and Mead continue to drop, it may be the most logical option for the Basin.

Thanks for your consideration,

Ryan McDermott

Six Emails – Fill Lake Mead first or remove Lake Powell

Dear Mr. Henrie:

Hello,

Pretty asinine that individuals want to "fill lake Powell" -- with what? Hope?

Do they not understand the downstream dynamics of this watershed... prioritizing "recreational" activities is honestly humorous as do they not know the history of Lake Powell... it was a beautiful natural landscape that we filled with water and silt with a dam project that will in all likelihood be worthless by the time it reaches a 100 years old. We are in the midst of a historic drought and with the continued stressors of climate change this is a worthless debate. Powell will be gone sooner than later, lets just return it to its natural glory sooner than later. RETURN GLENN CANYON TO ITS NATURAL STATE, and MAKE IT A NATIONAL PARK. There will still be plenty of economic activity in these local jurisdictions with a new (and rediscovered) national park.

K, thanx bai.

Sincerely,



Dear Mr. Henrie,

It's time to phase out Lake Powell as a reservoir. Lake Powell will likely drop below power pool and even reach dead pool in the coming years.

It's time to consolidate storage in Lake Mead. Thank you.

Marcy Matasick

Dear Mr. Henrie,

I am writing to comment on the Draft Upper Basin Drought Response Operations Plan.

Because the stop-gap measures in the draft plan will likely be "ineffective and futile" if drought conditions persist (which they undoubtedly will), the Bureau of Reclamation and stakeholders in the basin need to look at alternative solutions that phase out Lake Powell and use it as a backup, restoring Glen and Grand Canyons while adding flexibility to the system. The plan fails to address the realities of climate change and its impact on Glen Canyon and Grand Canyon. There is no good reason to put your head in the sand about expected future arid conditions persisting and worsening.

Please acknowledge the impact of climate change on the Colorado River, prepare for future low water years, focus on realistic, long-term solutions, discuss a diverse array of options with stakeholder, and, at a minimum, consider the eventual phasing out of Lake Powell as a reservoir - as hard as that may seem to

think about it must be part of the decision mix. The Bureau of Reclamation's 5-year probabilistic projection leads to the possibility of Lake Powell dropping below power pool and even nearing dead pool in the coming years. It is a very real and likely possibility that should not be ignored.

It makes no sense to have the Upper Basin prepare to sacrifice upstream reservoirs to buffer a failing Lake Powell. Instead, you should be joining the Glen Canyon Institute in calling for consolidated storage in Lake Mead. Everyone expects Powell and Mead to continue to drop, making consolidation in Mead - Fill Mead FIrst - the most logical option for the Basin.

Thanks for your consideration,

Chuck Sheketoff

To the USBR,

I have always heard, Sancho, that doing good to base fellows is like throwing water into the sea. - Miguel de Cervantes (1547-1616)

For most of the past two decades the actions of the USBR to prop up the water level of Lake Powell has been as effective as "throwing water into the sea". At some point, it must be embarrassing to have every recovery plan dashed upon the [formerly] red cliffs of Glen Canyon. It matters not, whether anyone at the USBR believes this plan will work. Nature will take its course and Lake Powell will continue to drop.

At what point will the USBR recognize the failure of all its vain hopes? Will the USBR wait until the power plant falls silent? Will the USBR continue to drain the upper basin reservoirs, throwing good water after bad? Probably.

One has to wonder. Are there no USBR staff asking, "If we started now to let the river run free to Lake Mead, would that result in a net conservation of water?"

Now is the time, before all the alternatives are taken from us by the momentum of drought, to consider the Fill Mead First option. I know the USBR resistance to this "not invented here" concept. It's time to swallow your pride and avoid future pain.

As the Pham Oil Filter guy used to say,

"You can pay me now, or you can pay me later"

Mark Belles

To whom it may concern,

Please remove Lake Powell. Hardly anyone takes water directly from Lake Powell. It is well known that you could put the contents of Lake Powell into Lake Mead and Lake Mead would be little more than half full (roughly 60 percent). Soon enough, there will be no hope of saving Lake Powell, so why kill all the

upstream reservoirs now? In my opinion, the most logical course of action is to fill the upstream reservoirs as much as you can and then allow the rest to go to Lake Mead.

Removing Lake Powell would allow for the return of Glen Canyon, the lost national park, and would hugely benefit the Grand Canyon's ecosystem by allowing natural flows to return.

The only reason that Lake Powell exists is because of the upper basin/ lower basin splitting of states, an illogical and idiotic decision from the early 1900's. If we want to deal with the water issues of the 21st century we cannot follow idiocies of the 20th.

Thank you for hearing my comments on Lake Powell and I look forward to seeing it removed by the Bureau of Reclamation.

Sincerely,

Dear Mr. Henrie,

Thank you for the opportunity to comment on the Draft Upper Basin Drought Response Operations Plan. I do not believe the measures outlined in the DROA draft adequately address the challenge that climate change presents to the Colorado River. The DROA plans only discuss increasing releases from upstream reservoirs, and slowing releases from Glen Canyon Dam. The plan itself recognizes these efforts may be "ineffective and therefore futile" if "dry conditions persist or worsen." Every climate study that focuses on the Colorado River suggests arid conditions will indeed persist and worsen, which should be reflected in the planning.

It is vital that drought planning acknowledge the impact of climate change on the Colorado River and prepare for future low water years. It should focus on realistic, long-term solutions and provide a framework for stakeholders to discuss a wide array of options, including the eventual phasing out of Lake Powell as a reservoir.

Based on the best available data from climate scientists, academics, and even the Bureau of Reclamation's 5-year probabilistic projection, there is a very real possibility of Lake Powell dropping below power pool and even nearing dead pool in the coming years. As the Upper Basin prepares to sacrifice upstream reservoirs to maintain a failing Lake Powell, this plan should consider alternatives that look beyond that paradigm and consolidate storage in Lake Mead. If Powell and Mead continue to drop, it may be the only viable option for the Basin.

Thanks for your consideration,

David Harrison

One Email – Lake Powell Pipeline

Hello How in God's name will the lake Powell pipeline get approved? I totally disagree with this project. We all need to use less water, Utah included. The Colorado river compact needs to be renegotiated also Sent from Mail for Windows

One Email - Compromise and communication

This is what happens when nobody compromises and nobody communicates the direness of the situation. https://www.usbr.gov/pn/hydromet/roguetea.html