ARIZONA DEPARTMENT OF WATER RESOURCES
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JANE DEE HULL
Governor

JOSEPH C. SMITH
Director

March 29, 2002

Jayne Harkins
Manager, River Operations
U.S. Bureau of Reclamation
P.O. Box 61470
Boulder City, NV 89006-1470

Dear Ms. Harkins:

Thank you for the opportunity to comment on the Criteria for Coordinated Long-Range Operation of the Colorado River Reservoirs (Operating Criteria). The Arizona Department of Water Resources (Department) does not feel that a public meeting is needed to solicit comments on the Operating Criteria. Written comments to the U.S. Bureau of Reclamation (BOR) should result in an adequately active public involvement process that includes all interested parties. We request that BOR provide to all that comment a summary of the comments and BORs response.

The State of Arizona holds an allocation of water in both the Upper Basin and Lower Basin of the Colorado River. The River is the largest renewable water supply within the State, providing water to the majority of its population centers and irrigated land. Although dependable water supplies are most important to the welfare of the State, river and reservoir operations are crucial to many other activities. Hydroelectric power is necessary for the municipal, industrial and agricultural economies. The dams and reservoirs provide flood control and protection of life and property. Boating, sport fishing and other recreation opportunities are essential to the economies of some of the smaller communities along the Colorado River. Environmental values associated with riparian and constructed water features are highly important to citizens of this State.

Great progress to adapt the operation of the Colorado River to the competing water demands has been made since the last review of the Operating Criteria in 1996. The Secretary of the Interior has adopted rules for the offstream storage of water between the states and adopted guidelines for the declaration of interim surplus water deliveries while California implements its Colorado River water plan. Both of these actions were completed within the framework of the 1970 Operating Criteria. The success of these programs is a clear indication that the Operating Criteria do not need to be changed at this time.

The Department strongly endorses the annual plan of operation (AOP) process including the associated consultations and reports. The open process of the AOP provides the best mechanism to review the relevant information on water demands, reservoir contents and projected runoff. This is the best process to continue to review the implementation of the interim surplus guidelines and adjust the operations of the reservoirs to react to changing conditions. The Department recommends that no changes to this section be made.

The section regarding the operation of the Upper Basin Reservoirs adequately addresses the operations of Lake Powell. We believe the actual practice of reservoir equalization has worked well and has met the objectives of spill avoidance and optimization of hydroelectric production. Annual modifications of the operation of Lake Powell suggested by the Adaptive Management Work Group for test flows for beach habitat building are best addressed through the flexibility of the AOP. We also understand that the Upper Basin States have certain fundamental legal and policy issues about the interpretation of how 602 (a) storage should be determined and over the quantity of the minimum objective release, but these issues are best decided within the context of the AOP at a time when the Upper Basin water consumption has increased to a point where the effects of the provision are more clearly determined. The Department recommends that no changes to this section be made.

The criteria for the determination of surplus, normal and shortage operation of Lake Mead has been adequate to make the necessary changes in operation to accommodate the interim surplus guidelines. Over the last five years, BOR and the Basin States worked together closely to develop interim surplus guidelines. These guidelines were developed under the framework of the Operating Criteria. We believe that the success of this cooperative effort indicates that that the Operating Criteria currently provide the flexibility to address the changes necessary for optimal operation of Lake Mead. The Department recommends that no changes to this section be made.

In conclusion, while the content of the current Operating Criteria is general, it still suffices as an adequate framework to allow for the proper consideration and modification of the annual operations of the reservoirs to meet the changing water needs on of the Basin States. No changes

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In conclusion, while the content of the current Operating Criteria is general, it still suffices as an adequate framework to allow for the proper consideration and modification of the annual operations of the reservoirs to meet the changing water needs on of the Basin States. No changes are necessary at this time, although continued cooperation through the AOP process will undoubtedly identify future opportunities for the refinement of operations.

If you have any questions, please contact me directly at 602-417-2410.

Sincerely,

Joseph C. Smith
Director

cc: Tom Carr, Section Manager, Colorado River Management
Arizona Department of Water Resources

JCS:kd