



United States Department of the Interior

BUREAU OF RECLAMATION
125 South State Street, Room 8100
Salt Lake City, UT 84138-1102



IN REPLY REFER TO:

UC-445
2.2.4.21

Memorandum

To: Tanya Trujillo
Assistant Secretary – Water and Science

Through: Camille Calimlim Touton Acting DAVID PALUMBO
Commissioner

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PALUMBO
Date: 2022.04.29
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From: Wayne G. Pullan WAYNE PULLAN
Regional Director

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PULLAN
Date: 2022.04.28 06:39:10 -06'00'

Subject: Recommendation to approve 2022 Drought Response Operations Plan

This memorandum recommends that the Department of the Interior approve the 2022 Drought Response Operations Plan (2022 Plan) (attached). The 2022 Plan has been prepared by the Bureau of Reclamation (Reclamation), the Upper Division States, and the Upper Colorado River Commission (collectively the “DROA Parties”) pursuant to the Drought Response Operating Agreement (DROA), a component of the 2019 Colorado River Drought Contingency Plan authorized by the Colorado River Drought Contingency Plan Authorization Act, Pub. L. No. 116-14, 113 Stat. 850 (Apr. 16, 2019).

The Upper Division States and the Upper Colorado River Commission have approved and forwarded the 2022 Plan for the Department’s consideration and approval. Reclamation recommends approval of the 2022 Plan for the reasons described below.

Summary of operations under the 2022 Plan

The DROA Parties considered operational adjustments at Glen Canyon Dam and numerous potential release and recovery scenarios for each Upstream Initial Unit (Flaming Gorge, Aspinall, and Navajo). The 2022 Plan includes the following key operational elements:

1. Drought Response Operations releases of approximately 500,000 acre-feet from Flaming Gorge Dam during the 2022 Plan Year (May 2022 – April 2023);
2. Possible Drought Response Operations releases from Blue Mesa Reservoir (Aspinall Unit) in Fall 2022 and Winter 2023, contingent upon available release volumes;

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3. Possible Drought Response Operations releases from Navajo Reservoir in Fall 2022 and Winter 2023, contingent upon available release volumes;
4. Possible operational adjustments at Glen Canyon Dam in Winter 2023; and
5. No anticipated recovery of DROA release volumes through the term of the 2022 Plan.

Development of the 2022 Plan

Reclamation staff have been working with the DROA Parties to develop the 2022 Plan since hydrologic projections in early 2021 indicated that Lake Powell could reach DROA's "Target Elevation" of 3,525 ft. Development of the 2022 Plan involved drafting two components: a Framework document (Framework) that contains provisions the DROA Parties will use to develop yearly Plans and will remain relatively unchanged from year to year (through the term of DROA ending in 2026); and 2022 attachments to this Framework (2022 Attachments) to identify the specific operations for 2022 described above.

Consistency with Initial Unit Operations

Any operation under DROA must be consistent with the authorities and flexibilities that govern the Initial Units at issue.¹ Reclamation's view is that the 2022 Plan complies with the project-specific criteria for each Initial Unit including, but not limited to, applicable Records of Decision, Biological Opinions, contracts, and authorized purposes. In addition to the substantive project-specific authorities at each Initial Unit, development of the 2022 Plan worked within the processes that determine Initial Unit operations.

Consultation, Coordination & Outreach

DROA requires various consultation, coordination, and outreach with various entities in the Colorado River Basin. The DROA Parties consulted with the Governor's Representatives of the Lower Division States, the Upper Colorado River Basin Tribes, other Tribes throughout the Colorado River Basin, federal agencies, water users and non-governmental organizations as required by the DROA.

Effectiveness

DROA requires an evaluation of effectiveness in reducing the risk of falling below the Target Elevation. Reclamation evaluated its effectiveness in achieving the goals and intent of the DROA after consultation, coordination, and outreach (as described above) and considered potential impacts of the Plan on natural resources, the Upper Colorado River Basin Fund, and the western Interconnected Bulk Electric System. Reclamation concluded that the 2022 Plan

¹The 2022 Plan does not address "emergency action" operations under DROA, and the Department "retains all applicable authority to make releases from [Colorado River Storage Project Act] Initial Units and perform subsequent recovery of storage operations if actual hydrology or actual operating experience demonstrate an imminent need to protect the Target Elevation at Lake Powell."

reduces the risk of dropping below critical elevations at Lake Powell to merit the release of water from Flaming Gorge Reservoir. The 2022 Plan may also be amended to include releases from Blue Mesa and Navajo Reservoirs and adjustments to Lake Powell releases if conditions warrant.

Relationship to pending decisions concerning Colorado River drought

The 2022 Plan, if approved, would be implemented in conjunction with other actions the Department is proposing to address Colorado River drought. On April 8, 2022, the Department indicated that it was considering actions under Sections 6 and 7(D) of the 2007 Colorado River Interim Guidelines for Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines) in light of the prolonged drought, low runoff conditions, and depleted storage at the reservoirs, specifically reducing the Glen Canyon Dam annual releases to 7.0 million acre-feet in water year 2022. If approved, such an action under the 2007 Interim Guidelines would further increase the elevation of Lake Powell in conjunction with DROA actions, and complement the 2022 Plan, though the 2022 Plan is independent of any potential actions under the 2007 Guidelines.

Recommendation

Reclamation recommends that the Department approve the 2022 Plan as transmitted by the Upper Division States and the Upper Colorado River Commission.

Implementation

If the Department approves the 2022 Plan, Reclamation will perform the following to implement the 2022 Plan's operations:

- Inform the DROA Parties of the Department's approval;
- Inform entities that participated in development of the 2022 Plan and post the approved 2022 Plan to Reclamation's DROA website; and
- Inform the operators of the affected Initial Units so that implementation of the 2022 Plan can begin.

Concurrence



Tanya Trujillo
Assistant Secretary, Water and Science

APR 29 2022

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