
Click Next to begin the Comment Form.

Commenter Information (Optional)

Before including your address, telephone number, electronic mail address, or other personally identifiable information in your comments, please be aware that because of federal disclosure requirements your entire comment (including your personally identifiable information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we will comply with all applicable disclosure requirements, and cannot guarantee that we will be able to do so.

1. Name

2. Email

3. Please let us know if you would like to:

- Be added to the 7.D. email list (enter email in Question 2)
- Provide feedback regarding your experience using this Form (enter email in Question 2)

4. Organization/Entity

Colorado River Board of California

5. Please identify the sector that most closely describes your entity:

- Local Government
- State Government
- Tribal Government
- Federal Government
- Agricultural Water Provider/Association
- Municipal Water Provider/Association
- Non-Governmental Organization
- Academic Institution
-

General Comments on the Draft Report

Please provide your overall feedback on the Draft Report
 (https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf
 (https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

6. Please respond to the following statements:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
The Draft Report is understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Draft Report's conclusions are supported.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Please provide general comments on the Draft Report:

(4,000 character limit)

Staff of the Colorado River Board of California (Board) appreciate the opportunity to provide comments on the U.S. Bureau of Reclamation's (Reclamation) Draft Report, Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead, also known as the 7D Effectiveness Review. Generally, the final review draft report does a good job of capturing many of the comments provided on the initial outline that Reclamation shared with stakeholders. Specifically, the draft report included additional information as recommended associated with the four operational elements in Section 3, and complementary activities in Section 4. The draft report also provides a more thorough description of the intentions and parameters regarding the scope of Reclamation's assessment and effectiveness review of the 2007 Interim Guidelines pursuant to Section XI.G.7.D of the 2007 Record of Decision.

Section 1: Introduction

Refer to Section 1, page 1 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

8. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 1 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. Are there any errors or is critical information missing in Section 1?

- Yes
- No

10. Please provide comments on Section 1 that support your responses above:

(4,000 character limit)

Section 2: Background on the Development of the Guidelines

Refer to Section 2, pages 2-3 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

11. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 2 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. Are there any errors or is critical information missing in Section 2?

- Yes
- No

13. Please provide comments on Section 2 that support your responses above:

(4,000 character limit)

Section 3: Purpose of the Guidelines and Common Themes

Refer to Section 3, pages 4-5 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

14. Please respond to the following statement:

Section 3 is clear and understandable.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. Are there any errors or is critical information missing in Section 3?

- Yes
- No

16. Please provide comments on Section 3 that support your responses above:

(4,000 character limit)

Section 4: Complementary Activities Since Adoption of the Guidelines

Refer to Section 4, pages 5-9 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

17. Please respond to the following statement:

Section 4 is clear and understandable.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. Are there any errors or is critical information missing in Section 4?

- Yes
- No

19. Please provide comments on Section 4 that support your responses above:
(4,000 character limit)

Section 5: Approach to the Review of the Guidelines

Refer to Section 5, page 10 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

20. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 5 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

21. Are there any errors or is critical information missing in Section 5?

- Yes
- No

22. Please provide comments on Section 5 that support your responses above:
(4,000 character limit)

Section 6: Significant Considerations Based on Scope and Approach Comments

Refer to Section 6, pages 10-13 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

23. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 6 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

24. Are there any errors or is critical information missing in Section 6?

Yes

No

25. Please provide comments on Section 6 that support your responses above:

(4,000 character limit)

Section 7: Implementation of the Guidelines

Refer to Section 7, pages 13-39 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

26. Please respond to the following statement regarding Section 7.1 - Overview of Lake Powell and Lake Mead Conditions:

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="radio"/>				

Strongly Agree Agree Neutral Disagree Strongly Disagree

Section 7.1 is clear and understandable.

27. Are there any errors or is critical information missing in Section 7.1?

- Yes
- No

28. Please provide comments on Section 7.1 that support your responses above:
(4,000 character limit)

Section 7 of the draft report includes a number of specific examples of the effectiveness of the Guidelines. The Board suggests incorporating these examples into the narrative discussion of the effectiveness in Section 8. For example, the volume of water conserved by the Lower Basin and stored in Lake Mead is a direct quantitative measurement of the effectiveness of the Guidelines and should be highlighted. Section 7.1, page 14, first sentence lists the factors influencing Lake Powell and Lake Mead conditions, but inexplicably still does not include Upper Basin demands and the delivery obligation to Mexico. Both of these factors influence conditions in both reservoirs and should be highlighted.

29. Please respond to the following statement regarding Section 7.2 -
Determination of Lake Powell and Lake Mead Operations:

Strongly Agree Agree Neutral Disagree Strongly Disagree

Section 7.2 is clear and understandable.

30. Are there any errors or is critical information missing in Section 7.2?

- Yes
- No

31. Please provide comments on Section 7.2 that support your responses above:
(4,000 character limit)

32. Please respond to the following statement regarding Section 7.3 - Coordinated Operation of Lake Powell and Lake Mead:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.3 is clear and understandable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

33. Are there any errors or is critical information missing in Section 7.3?

Yes

No

34. Please provide comments on Section 7.3 that support your responses above:
(4,000 character limit)

Section 7.3.1.1, page 2, second paragraph states the physical limitations on Glen Canyon Dam that prevented releasing the full equalization volume and that the Guidelines did not provide explicit guidance for this circumstance. This statement should be clarified to say the limitation is associated with releases and the power plant capacity. Section 7.3.1.2 - page 23, fourth paragraph, states the Lower Basin water use averaged 8.53 MAF from 2015 to 2019. This should be clarified to say that this refers to water use by Lower Basin states and Mexico. Water use by Mexico is separate and distinct from Lower Basin water use under the Law of the River. In fact, for the period 2011-2019, the Lower Basin water uses averaged 7.23 MAFY, which also likely speaks to the overall "effectiveness" of the Guidelines.

35. Please respond to the following statement regarding Section 7.4 - Lake Mead Operations:

Section 7.4 is clear and understandable.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

36. Are there any errors or is critical information missing in Section 7.4?

- Yes
- No

37. Please provide comments on Section 7.4 that support your responses above:
(4,000 character limit)

38. Please respond to the following statement regarding Section 7.5 - Intentionally Created Surplus:

Section 7.5 is clear and understandable.

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

39. Are there any errors or is critical information missing in Section 7.5?

- Yes
- No

40. Please provide comments on Section 7.5 that support your responses above:
(4,000 character limit)

Section 7.5.1.2., page 31, second paragraph, while it is discussed later in Section 7.6.4.2, on page 39, it is suggested that the calendar year (CY) 2017 situation with the modification of the Metropolitan Water District of Southern California's (MWD) ICS creation plan should also be addressed and cross-referenced here.

41. Please respond to the following statement regarding Section 7.6 - Process and Consultation:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.6 is clear and understandable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

42. Are there any errors or is critical information missing in Section 7.6?

- Yes
- No

43. Please provide comments on Section 7.6 that support your responses above:
(4,000 character limit)

Section 7.6.4.2., page 39, similar to the comment for Section 7.5, this section should reach back with a cross reference to Section 7.5.1.2. and reference the CY-2017 ICS creation plan modification by MWD.

Section 8: Effectiveness of the Guidelines

Refer to Section 8, pages 39-42 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

44. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 8 is clear and understandable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

45. Are there any errors or is critical information missing in Section 8?

Yes

No

46. Please provide comments on Section 8 that support your responses above:

(4,000 character limit)

Please see comments provided via email

Section 9: Summary

Refer to Section 9, page 42 of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)).

47. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 9 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

48. Are there any errors or is critical information missing in Section 9?

Yes

No

49. Please provide comments on Section 9 that support your responses above:

(4,000 character limit)

Appendix A - Operational Documentation

Refer to Appendix A of the Draft Report

(https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf (https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf)).

50. Please respond to the following statement regarding Section A.2 - 24-Month Study Background:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.2 is clear and understandable.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

51. Are there any errors or is critical information missing in Section A.2?

- Yes
- No

52. Please provide comments on Section A.2 that support your responses above:

(4,000 character limit)

Section A.2.2.2., footnote no. 7, page A-3, as a side-note, can you provide additional clarification or information regarding the source of the "irrigated acreage" that is referred to in this footnote? Is that data/information available, and is it available on a state-by-state basis?

53. Please respond to the following statement regarding Section A.3 - Review of Operations:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.3 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

54. Are there any errors or is critical information missing in Section A.3?

Yes

No

55. Please provide comments on Section A.3 that support your responses above:
(4,000 character limit)

56. Please respond to the following statement regarding Section A.4 - 24-Month Study Accuracy:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.4 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

57. Are there any errors or is critical information missing in Section A.4?

Yes

No

58. Please provide comments on Section A.4 that support your responses above:

(4,000 character limit)

