
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

Dolores Water Conservancy District

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Please provide general comments on the Draft Report:

(4,000 character limit)

The 7.D review does appear to cover most of the technical aspects of the 2007 IG operations to date. As I have watched the IG implementation and read your current review, it is clear about the appropriate focus on the LB use and operations. Given the natural hydrological drivers in the UB that end at Powell, after which the Colorado River becomes a much more heavily managed system with operated releases from storage above use. The IG have certainly achieved improved water conservation and improved water operation management in the LB. You have captured the best available modeling at the time of IG adoption and noted impressive data gathering, new science and improvements to modeling since adoption of the 07 IG. New tools were created within the IG, such as ICS, that were utilized by the LB with sufficient experience to modify and revise when adopting the 2019 LBDCP. The UB really only comes in via prescribed operations of Powell in reaction to both natural hydrology and LB water use and operations. Unfortunately, that limited active UB involvement in new 2007 IG operations. The UB Powell impact is incorporated in one of the four operational elements. Coordinated Reservoir Operations: Defines the coordinated operation of Lake Powell and Lake Mead to provide improved operation of the two reservoirs, particularly under low reservoir conditions. As described in Section XI.G.6 of the ROD, the objective of operation of Lake Powell and Lake Mead is "to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin." The protections above are implicit in Powell operations and do not appear to be directly addressed. Prior operations had sourced their guidance to the 1968 CRBPA and subsequent CRITERIA FOR COORDINATED LONG-RANGE OPERATION OF COLORADO RIVER RESERVOIRS. Although the 7.D Review captures outcomes observed versus anticipated at adoption it fails to explore alternate paths that might have been taken. I understand the most recent 15 years of hydrology were not readily apparent while working towards the IG and hydrology remains the prime driver of the system. Still the clear Congressional intent in the 1968 CRBPA that Powell operations give "... consideration of all relevant factors (including, but not limited to historic stream flows, the most critical period of record and probabilities of water supply), ..." This is followed up by "Section 603 (a) Rights of the upper basin to the consumptive use of water available to that basin from the Colorado River system under the Colorado River Compact shall not be reduced or prejudiced by any use of such water in the lower basin." I do not think that the 7.D Review adequately addressed impacts to Lake Powell. It could have contrasted alternate operations of Powell that would consider protection of UB uses now and planned future development. Finally the 7.D Review of LB ICS captures current actions to date, but does not fully explore future use of the ICS and potential impacts when withdrawn from Lake Mead. This remains somewhat hypothetical as a future action, but should at least be explored at some level.

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)

There was much more history and I do not know well enough to say how well the full backstory was captured.

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:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 3 is clear and understandable.	<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:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 4 is clear and understandable.	<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)

You have captured the best available modeling at the time of IG adoption and noted impressive data gathering, new science and improvements to modeling since adoption of the 07 IG.

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 type="radio"/>	<input checked="" 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)

Limits the scope too much. The UB really only comes in via prescribed operations of Powell in reaction to both natural hydrology and LB water use and operations. Unfortunately, that limited active UB involvement in new 2007 IG operations. The UB Powell impact is incorporated in one of the four operational elements. Coordinated Reservoir Operations: Defines the coordinated operation of Lake Powell and Lake Mead to provide improved operation of the two reservoirs, particularly under low reservoir conditions. As described in Section XI.G.6 of the ROD, the objective of operation of Lake Powell and Lake Mead is "to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin." The protections above are implicit in Powell operations and do not appear to be directly addressed. Prior operations had sourced their guidance to the 1968 CRBPA and subsequent CRITERIA FOR COORDINATED LONG-RANGE OPERATION OF COLORADO RIVER RESERVOIRS.

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 type="radio"/>	<input type="radio"/>	<input checked="" 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)

Although the 7.D Review captures outcomes observed versus anticipated at adoption it fails to explore alternate paths that might have been taken. I understand the most recent 15 years of hydrology were not readily apparent while working towards the IG and hydrology remains the prime driver of the system. Still the clear Congressional intent in the 1968 CRBPA that Powell operations give "...consideration of all relevant factors (including, but not limited to historic stream flows, the most critical period of record and probabilities of water supply), ..." This is followed up by "Section 603 (a) Rights of the upper basin to the consumptive use of water available to that basin from the Colorado River system under the Colorado River Compact shall not be reduced or prejudiced by any use of such water in the lower basin." I do not think that the 7.D Review adequately addressed impacts to Lake Powell. It could have contrasted alternate operations of Powell that would consider protection of UB uses now and planned future development.

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
Section 7.1 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)

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.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)

Hard to tell

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 type="radio"/>	<input checked="" 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)

The UB really only comes in via prescribed operations of Powell in reaction to both natural hydrology and LB water use and operations. Unfortunately, that limited active UB involvement in new 2007 IG operations. The UB Powell impact is incorporated in one of the four operational elements. Coordinated Reservoir Operations: Defines the coordinated operation of Lake Powell and Lake Mead to provide improved operation of the two reservoirs, particularly under low reservoir conditions. As described in Section XI.G.6 of the ROD, the objective of operation of Lake Powell and Lake Mead is "to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin." The protections above are implicit in Powell operations and do not appear to be directly addressed. Prior operations had sourced their guidance to the 1968 CRBPA and subsequent CRITERIA FOR COORDINATED LONG-RANGE OPERATION OF COLORADO RIVER RESERVOIRS. Although the 7.D Review captures outcomes observed versus anticipated at adoption it fails to explore alternate paths that might have been taken. I understand the most recent 15 years of hydrology were not readily apparent while working towards the IG and hydrology remains the prime driver of the system. Still the clear Congressional intent in the 1968 CRBPA that Powell operations give "... consideration of all relevant factors (including, but not limited to historic stream flows, the most critical period of record and probabilities of water supply), ..." This is followed up by "Section 603 (a) Rights of the upper basin to the consumptive use of water available to that basin from the Colorado River system under the Colorado River Compact shall not be reduced or prejudiced by any use of such water in the lower basin." I do not think that the 7.D Review adequately addressed impacts to Lake Powell. It could have contrasted alternate

operations of Powell that would consider protection of UB uses now and planned future development.

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

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.4 is clear and understandable.	<input type="radio"/>	<input type="radio"/>	<input checked="" 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:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.5 is clear and understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input 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)

The 7.D Review of LB ICS captures current actions to date, but does not fully explore future use of the ICS and potential impacts when withdrawn from Lake Mead. This remains somewhat hypothetical as a future action, but should at least be explored at some level.

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"/>				

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 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 type="radio"/>	<input checked="" 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)

The UB really only comes in via prescribed operations of Powell in reaction to both natural hydrology and LB water use and operations. Unfortunately, that limited active UB involvement in new 2007 IG operations. The UB Powell impact is incorporated in one of the four operational elements. Coordinated Reservoir Operations: Defines the coordinated operation of Lake Powell and Lake Mead to provide improved operation of the two reservoirs, particularly under low reservoir conditions. As described in Section XI.G.6 of the ROD, the objective of operation of Lake Powell and Lake Mead is "to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin." The protections above are implicit in Powell operations and do not appear to be directly addressed. Prior operations had sourced their guidance to the 1968 CRBPA and subsequent CRITERIA FOR COORDINATED LONG-RANGE OPERATION OF COLORADO RIVER RESERVOIRS. Although the 7.D Review captures outcomes observed versus anticipated at adoption it fails to explore alternate paths that might have been taken. I understand the most recent 15 years of hydrology were not readily apparent while working towards the IG and hydrology remains the prime driver of the system. Still the clear Congressional intent in the 1968 CRBPA that Powell operations give "... consideration of all relevant factors (including, but not limited to historic stream flows, the most critical period of record and probabilities of water supply), ..." This is followed up by "Section 603 (a) Rights of the upper basin to the consumptive use of water available to that basin from the Colorado River system under the Colorado River Compact shall not be reduced or prejudiced by any use of such water in the lower basin." I do not think that the 7.D Review adequately addressed impacts to Lake Powell. It could have contrasted alternate operations of Powell that would consider protection of UB uses now and planned future development.

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"/>				

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"/>				

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)

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"/>				

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"/>				

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)