



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager

November 13, 2020

Carly Jerla, U.S. Bureau of Reclamation, Lower Colorado Basin Region  
Malcolm Wilson, U.S. Bureau of Reclamation, Upper Colorado Basin Region  
7DReview@usbr.gov

Dear Ms. Jerla and Mr. Wilson:

Re: Comments on Reclamation's Final Review Draft "Review of the Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead" (7.D. Effectiveness Review)

Thank you for the opportunity to comment on Reclamation's Final 7.D. Effectiveness Review. Metropolitan supports the U.S. Bureau of Reclamation's (Reclamation) approach to the 7.D. Effectiveness Review as a retrospective review and evaluation of past operations under the Guidelines, including analysis of the various individual and collective management arrangements adopted after the Guidelines, in particular the Upper and Lower Basin Drought Contingency Plans and Minutes 319 and 323 of the 1944 Water Treaty

The Record of Decision for the *Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations of Lake Mead Collaboration* (Guidelines) came together through collaboration and cooperation in a time of drought, decreasing system storage, increasing demands for water and potential for conflict between the Basin States that rely on and share the Colorado River. Since the Guidelines were adopted, the pressures on the Colorado River system have only increased due to climate change, the continuation of the drought that started in 2000, and warming temperatures. The Guidelines gave Reclamation and water users a structure on which to build a wide variety of collaborative efforts and partnerships to respond to these increased pressures. These efforts also demonstrated the importance of partnership, cooperation and collaboration for effective Colorado River operations in the future.

The Guidelines were effective in encouraging investment in programs that led to significant conservation and increased water stored in Lake Mead during a time of acute loss in system storage that would have been more severe without the incentives to store water established in the Guidelines. The largest conservation efforts resulted from the structure and incentives created in the Guidelines by Intentionally Created Surplus (ICS). Establishment of ICS in the Guidelines successfully led to significant increases in conservation in the Lower Basin and storage of an additional 3.1 million-acre feet in Lake Mead, while also providing an important tool for ICS Contractors to reduce the risk of variable hydrology. Metropolitan, as one example, participated in ICS in ways that led to large-scale conservation, meaningfully increasing elevation levels in Lake Mead and also relied on ICS as a vital source of stored water during the historic California drought in 2013-2015.

Inflow into the Colorado River system has been lower than anticipated when the Guidelines were developed, resulting in the need for the Basin States and water Contractors, including Metropolitan, to work collaboratively and invest in a range of programs and agreements to increase conservation, improve system storage and reduce the risk of Lake Mead and Lake Powell declining to critically low elevation

levels. These efforts included support and participation of a range of stakeholders and water users in the Basin including Mexico, tribes, as well as non-governmental organizations which have all partnered in various efforts that built on the base established in the Guidelines. It is clear that this type of partnership and collaboration among stakeholders will be even more necessary for effective river management in the future.

Very truly yours,

/s/ *Shanti Rosset*

Shanti Rosset  
Colorado River Program Manager

SR:rw