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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

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### Division of Water Resources

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November 13, 2020

Bureau of Reclamation  
Attention: Ms. Kaylee Nelson, LC-6056  
P.O. Box 61470  
Boulder City, NV 89006-1470

Re: State of Utah Comments Regarding Draft Report of the Review of the 2007 Interim Guidelines (Section 7.D. Review)

Dear Ms. Nelson:

The State of Utah appreciates this opportunity to comment on the Bureau of Reclamation's publication of its "Draft Report – Review of the Colorado River Interim Guidelines of Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead," ("Draft Report") pursuant to Section XI.G.7.D of the Record of Decision ("7.D. Review"). We feel this report provides a valuable and necessary perspective on the effectiveness of the 2007 Interim Guidelines (Guidelines). The State of Utah appreciates its constructive relationship with both federal officials, the other Colorado River Basin states, and the Upper Colorado River Commission, and expects that the secretary will continue to consult with the states and the Commission as it works to finalize the 7.D. Review. Utah offers the following observations and recommendations regarding the draft report:

### General Impressions

As a review of a complicated, multifaceted agreement between seven states, this report is mostly successful at describing a broad range of factors related to implementation of the Guidelines. It is crucial to recognize the far-reaching effects of the decisions and arrangements related to the negotiations which led to these Guidelines, and we are pleased to see that the report describes this spectrum of connections.

While Reclamation has captured much of the breadth of the history and general effectiveness of the Guidelines, there is a glaring weakness when it comes to evaluation of the effects the guidelines have had on the Upper Basin States and Lake Powell. We acknowledge that the purposes of the Guidelines as described in the ROD do not specify the Upper Basin directly, however, the preferred alternative includes this important goal: "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." Although the report identifies this as a "common theme" we feel this goal could be given elevated status in chapters and sections of the evaluation. The Upper Basin was an equal partner in the negotiations and it is reasonable to expect that the one goal from the ROD specific to the Upper Basin would be more thoroughly considered.



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We understand that implementation of the Guidelines has not caused a declared shortage or related discontinuation of uses in the Upper Basin. Still, Utah requests that reduction in the amount of water potentially available for development in Upper Basin states be addressed as part of the effectiveness review—particularly in light of the impact to Lake Powell of several 9.0 million acre-feet releases under the guidelines.

### **Technical Questions and Comments**

In the sections covering operations the review typically takes the approach of considering the effects of the guidelines in terms of projections versus observations. While this particular angle is important, there is a need for analysis that weighs the effects of having Guidelines as opposed to how operations under the Long Range Operating Criteria would have fared. This type of analysis would provide an essential baseline for understanding the value and effectiveness of the Guidelines.

The report also discusses how hydrology was a major reason for the unexpected low reservoir elevations experienced during the review period of 2008 through 2019. Poor hydrology is undoubtedly a significant contributing factor to the differences between modeled and observed elevations, but comparing how actual hydrology responds in the 2007 preferred alternative version of the model may help identify how well the modeling rules represented actual operations. We recommend that actual 2008 to 2019 hydrology be applied to the 2007 version of the Colorado River System Simulation and compared with observed results.

We suggest clarification regarding Figure 7 would be helpful. The red boxed line in the figure appears to represent the ten-year cumulative volumes for each observed year. The question is, how were the previous nine years to the interim period determined for this line on the plot? If these years were from the observed record while not under the Guidelines operations, does that make the figure only partially representative of the effects of the Guidelines?

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We appreciate the opportunity to comment on the Draft Report as it relates to the 7.D. Review. And, we hope that, as the renegotiation process goes forward, the unique relationship between the seven Colorado River Basin states and the Bureau of Reclamation will be acknowledged and respected. Thank you for your time and consideration.

Sincerely,



Todd D. Adams