



# COLORADO RIVER DISTRICT

PROTECTING WESTERN COLORADO WATER SINCE 1937

December 11, 2023

Reclamation 2007 Interim Guidelines SEIS Project Manager  
Upper Colorado Basin Region  
125 South State Street, Suite 8100  
Salt Lake City, UT 84138

VIA ELECTRONIC MAIL:

CRinterimops@usbr.gov

RE: *Comments on the Revised Draft Supplemental Environmental Impact Statement (“Revised Draft SEIS”) for Near-term Operations to Modify the 2007 Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (“2007 Interim Guidelines”)*

Dear Bureau of Reclamation Draft SEIS Team:

The Colorado River Water Conservation District (“Colorado River District”) submits the following comments regarding the Revised Draft SEIS to modify the 2007 Interim Guidelines released by the Bureau of Reclamation (“Reclamation”) on October 25, 2023.

The Colorado River District is a water policy and planning political subdivision of the State of Colorado charged with the protection and development of the Colorado River for the benefit of the District’s inhabitants and the entire State of Colorado. We support the December 11, 2023 comments provided by the Upper Colorado River Commission (“UCRC”) regarding the Revised Draft SEIS.

The Colorado River District stresses the following points:

1.) Lower Basin water use reductions.

As described in the previously released DSEIS, the Lower Basin water use reductions were to be “mandatory, enforceable, measurable, verifiable, and non-retrievable.” The Revised Draft SEIS does not clearly nor sufficiently define the timing, amount by source and/or accounting methods of the proposed lower basin conservation measures.



Beyond the requirement of a minimum of 1.5 MAF compensated water conservation by the end of operating year 2024, as described in the proposed action alternative, there is no written requirement to implement additional steps to reduce Lower Basin water use.

Furthermore, the Revised Draft SEIS fails to differentiate the type of conservation volumes between conservation that accrues to the system (and is thus non-retrievable by a specific party) versus Intentionally Created Surplus (ICS) which can be retrieved and delivered at a later date (thus, simply delaying the depletion to the system instead of creating saved water). In order to provide new benefits to the system, the Lower Basin water use reductions incorporated into the preferred Action Alternative should be achieved through new, additional, and verifiable conservation projects that must be accounted for separately from any conservation measures that already are in place pursuant to the existing 2007 Interim Guidelines, the 2019 Drought Contingency Plan, or other existing pledges of conservation.

2.) Operational Tiers and reduced annual release volumes (i.e., 6.0 million acre-feet/year).

The Revised Draft SEIS fundamentally changes the operational approach described in the original DSEIS. The Colorado River District believes that operational approach from the original DSEIS should remain in the SEIS, so that when Lake Powell is at or below elevation 3,575, releases are set at 6.0MAF, with adjustments related to April 24 month projections necessary to meet end-of-water-year levels of 3,575' or greater. We share the concerns expressed by the UCRC that the revised Proposed Action Alternative reverts to the traditional operational tiers, associated with the 2007 Interim guidelines that have not adequately protected the system. The revised Proposed Action Alternative no longer affords Reclamation the tools it needs to adequately protect federal infrastructure at Lake Powell

Without proactive changes related to Lower Basin water uses and the allowance for the potential operational changes described in the original DSEIS, we remain acutely concerned about the future viability of the system.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew A. Mueller".

Andrew A. Mueller  
General Manager