



Upper Gunnison River Water Conservancy District

December 20, 2022

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

VIA ELECTRONIC MAIL: CRinterimops@usbr.gov

Dear Ms. Johnson,

The Upper Gunnison River Water Conservancy District is submitting the following comments in response to the U.S. Bureau of Reclamation's preparation of a Supplemental Environmental Impact Statement (SEIS) related to potential amendment of the 2007 Record of Decision for the *Colorado River Interim Guidelines for the Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead*.

Water users within the Colorado River Basin need to live within the means of the river and the USBR should be basing decisions on annual available hydrology. The inadequacy of the current 2007 Interim Guidelines and the history of overuse by the Lower Basin during this unprecedented long-term drought clearly identify a need to modify operations to be consistent with the reality of our available water supply.

It is critical that USBR also address system losses within the Lower Basin including evaporation, distribution loss, and seepage when evaluating any proposed new operational plans, otherwise the Lower Basin States will continue their history of overuse and the system will continue toward collapse.

The SEIS must also be limited in scope to the operations of Lake Powell and Lake Mead. The SEIS should not extend to other Colorado River Storage Project reservoirs in order to avoid conflict with actions being undertaken as part of the Drought Response Operations Agreement and the 2019 Upper Basin DCP. The DCP is separate and distinct from the SEIS.

Finally, the Upper Gunnison District does not support the No Action Alternative identified in the SEIS. Upper Gunnison Basin water users have had twenty years of experience living with climate change and long-term drought as we have no large upstream storage buckets, therefore, we respectfully urge the Secretary to work with Lower Basin States to do the same.

Sincerely,

Sonja Chavez
General Manager