



Dolores Water Conservancy District

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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
CRinterimops@usbr.gov.

Re: Comments on Reclamation's Supplemental Environmental Impact Statement for December 2007 Record of Decision Entitled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Dear Project Manager:

Past agreements to limit the elevation declines of Lakes Powell & Mead, including the 2007 Interim Guidelines and subsequent 2019 Drought Contingency Plan, have proven insufficient given the continued dry Colorado River Basin hydrology. Therefore, Reclamation needs to operate both reservoirs based on natural annual inflows for the foreseeable future. The initial question involves at what level can Lake Powell be managed to safely operate releases through Glen Canyon Dam while balancing impacts to lower basin water users, recreation, the environment and power users.

Reclamation has expressed real concerns operating Glen Canyon releases from Powell below the 3490' minimum power pool, based on water deliveries, hydropower and safe facility operations. Reclamation should clarify potential impacts of releases below the hydropower turbines and how Glen Canyon Dam operations can adequately operate through the River Outlet Works before allowing Powell elevations to drop below the 3490' minimum power pool.

Powell elevations below 3490', leading to the loss of power production, has significant negative impacts to Colorado River Basin rural communities and Tribes, City of Page, other Reclamation projects, the Western Area Power Administration and ultimately Lake Mead operations. Current concerns include the potential loss of operational control, recreation and environmental impacts, loss of power production and power grid stability. Even if Reclamation determines that operations below 3490' are possible, the stored pool is minimal, less than 7 MAF, the historic minimum annual Powell release. Under

current recent hydrologic trends, the lowered releases will impact Lake Mead similarly in short order as Hoover Dam losses power production and Lake Mead lowers towards dead pool.

For the next few years both Lakes Mead and Powell operations need to be linked to seasonal runoff forecasts, best recognized preliminarily in April and more accurately in June. Basing releases from snow fed spring runoff will allow stability in both reservoirs for continued safe and manageable operations. A late season adjustment, September or October can protect Powell's elevations until the following spring's low elevation when runoff inflows return.

Releases should vary with natural supply annually until such surplus inflow is captured in reservoir storage, based on modeling with actual historical measured minimum inflows, it is safe to adjust releases towards historical practices. Recent Reclamation modeling with actual historical dry hydrology is starting to define these targets.

Reclamation has committed to additional modeling to help define the details to better designate protected elevations for both Lake Powell and Lake Mead. I hope these model results will be released as available for all Colorado River stakeholders as available prior to next spring for continued evaluation by all parties. I look forward to additional model results and the draft Supplemental EIS to be released next spring.

Ultimately the hydrology will force demand to match the available supply and Reclamation will have to manage those supplies accordingly to avoid a loss of Colorado River system control.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Curtis III".

Kenneth W. Curtis III
General Manager
Dolores Water Conservancy District