

1 Attachment C

2  
3 2026 Drought Response Operations Plan

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5 Operations at Flaming Gorge

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8 1. Flaming Gorge Operations Without Drought Response

9 Flaming Gorge is operated for authorized purposes, including water storage, contract  
10 releases, power production, recreation, and environmental conditions downstream of the  
11 reservoir for endangered fish recovery pursuant to the 2005 Biological Opinion and 2006  
12 Flaming Gorge Record of Decision (FG ROD). Operating criteria have been developed to  
13 produce the necessary environmental parameters under a variety of hydrologic  
14 conditions<sup>1</sup>.

15 The allowable range of Flaming Gorge operations is a function of the period of the year,  
16 the three reaches<sup>2</sup>, hydrologic conditions, and ongoing or planned studies related to  
17 adaptive management in support of the endangered fish recovery program. The flow  
18 request letter is received annually from the Recovery Program and prioritizes  
19 experiments based on hydrologic classification for that year. Current operations at  
20 Flaming Gorge reflect ongoing experimentation that has been coordinated by and through  
21 the Flaming Gorge Technical Working Group (FGTWG) and with the Flaming Gorge  
22 Working Group (FGWG) stakeholders.

23  
24 Flaming Gorge operations are established in the spring based on forecasted runoff for the  
25 upcoming 12 months. The year is broken into three periods: Spring, Base Flow, and  
26 Transition.

27  
28 The Flaming Gorge Annual Operation Plan (FG AOP) describes specific annual  
29 operations and releases made within the flexibility of the 2006 FG ROD. Specific  
30 operations for the Spring Period are established in the FG AOP for each given year and  
31 its timing varies depending on yearly hydrology. The Base Flow Period follows the  
32 Spring Period and typically constitutes flows from mid-July through the end of February.  
33 The Transition Period runs from March 1st through the beginning of the Spring Period or  
34 peak release. The FG AOP may be amended. Details of potential flows during each of the  
35 periods can be found in the FG AOP.

36 The Spring Period marks the beginning of the FG AOP. It is characterized by the timing  
37 of the Spring Runoff and typically includes the months of April through mid-July. The

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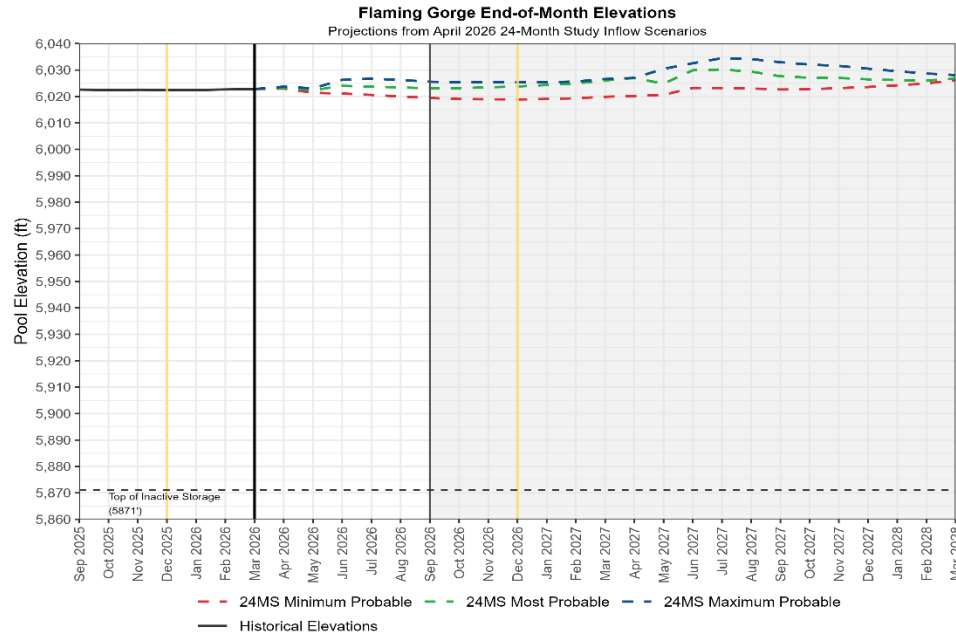
<sup>1</sup> These criteria are found in several documents, including the Environmental Impact Statement, Record of Decision, Biological Opinion, and the FG AOP, among others.

<sup>2</sup> Reach 1 is from Flaming Gorge Dam to the Yampa River confluence. Reach 2 is from the Yampa River confluence to the White River confluence. Reach 3 is from the White River confluence to the Colorado River confluence.

38 timing of the spring runoff period varies depending on yearly hydrology of the basin and  
39 is established in the FG AOP. The Base Flow Period follows the Spring Period and  
40 typically constitutes flows from mid-July through the end of February. The Base Flow  
41 Period is further categorized by the Summer, Autumn, and Winter Base Flows which  
42 vary according to downstream targets (2006 ROD) established in approved study plans  
43 and are dependent on Yampa River flows and Flaming Gorge reservoir surface elevation.  
44 The Transition Period comprises releases from March through April. The Transition  
45 Period is primarily used for flood control operations, ensuring the Transition Period ends  
46 at a low enough elevation to safely pass Spring Period inflows.

47 2. Based on current hydrology, the current hydrologic classification is Moderately  
48 Dry. Section 2.5.3.1 of the 2005 EIS states that either 1 or 2 classifications higher  
49 (wetter) or one lower (drier) than the identified classification could be recommended for  
50 the Spring Period. As such, this 2026 DROA Plan utilizes the flexibility under the ROD  
51 to implement a spring target within the Average hydrologic classification, which is  
52 currently 1 classification above Moderately Dry, and could be 2 classifications above if in  
53 the Dry classification. Section 2.5.3.3 further states that the hydrologic classification for  
54 the Base Flow Period will be based on the unregulated inflow into Flaming Gorge  
55 Reservoir during the Spring Period. Additionally, paragraph II of the FG ROD provides  
56 that Reclamation's "decision includes the potential for refinement of the flow and  
57 temperature recommendations if relevant new information gained through adaptive  
58 management supports that possibility." The upper range of the 2026 DROA Plan  
59 assumes maintaining the Average classification targets through the summer, fall, and  
60 winter baseflow season, consistent with the provisions of paragraph II of the FG ROD.  
61 The DROA operation within the Moderately Dry and Average classification targets are  
62 further described in Table 1 below. Current Hydrology

63 Reclamation's April 2026 24-Month Study forecast for the April through July inflow into  
64 Flaming Gorge Reservoir is 490,000 acre-feet, or 51 percent of average. The hydrologic  
65 classification for the Upper Green is moderately dry per the FG ROD. Forecasted  
66 exceedance flow volumes from the Yampa River Basin fell into the dry hydrologic  
67 condition. There is flexibility in the FG ROD that allows for a change in hydrology  
68 classification; two higher and one lower than that designated by the forecasted  
69 unregulated inflow volume on May 1. Based upon the May 1 forecasted unregulated  
70 inflow (based on the April 2026 24-Month Study forecast) the hydrologic classification is  
71 moderately dry.



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73 3. Flaming Gorge Operations without Drought Response during the 2026 Drought Response  
 74 Operations Plan Year

75 Flaming Gorge operations without Drought Response Operations were developed  
 76 through the established process for the FG AOP, but for the 2026 DROA Plan May 2026  
 77 through April 2027 timeframe.

78 The FG AOP outlines the Upper Colorado River Endangered Fish Recovery Program  
 79 (Recovery Program) flow request, which includes three scenarios, one equal to or less  
 80 than 30 percent exceedance, one between 30 and 70 percent exceedance, and one above  
 81 70 percent exceedance. For 2026, the Recovery Program prioritized three experiments in  
 82 the most likely scenario, a moderately dry scenario<sup>3</sup>. The highest priority is a smallmouth  
 83 bass (SMB) flow spike, followed by the Colorado pikeminnow (CPM) proposed flows,  
 84 and then the spring releases consistent with Larval Trigger Study Plan (LTSP). Water is  
 85 released for these priorities if hydrology permits. The FG AOP includes dry, moderately  
 86 dry, average, and moderately wet scenarios.

87 Before Spring Peak Releases (May) – Prior to the spring peak releases, releases will be  
 88 maintained at 800 cfs.

89 Spring Peak Releases -- During the spring peak flow period, a spring peak release of  
 90 approximately 4,600 cfs below the dam for one day will be targeted. Following the spring  
 91 peak, releases will be ramped-down to 800 cfs until the SMB flow spike.

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<sup>3</sup> Flow request letter dated December 11, 2025.

92 Smallmouth Bass Flow Spike -- Following the post-LTSP period, the SMB flow spike  
93 will occur. This flow spike will consist of a ramp-up to full power plant capacity (about  
94 4,600 cfs) in one day, an experimental flow of 72-hours duration maintained at full power  
95 plant capacity, and a down-ramp at 2,000 cfs per day, back down to a release rate of 800  
96 cfs. The SMB flow spike is predicted to occur between mid-June and early July, with  
97 timing based on biologic triggers.<sup>4</sup>

98 Base Flow Period -- During the base flow period (early-mid July through February),  
99 releases from the dam will be approximately 1,050 cfs with Reach 2 targets in the lower  
100 Muth et al. moderately dry range of 1,100-1,500 cfs. This may include being within the  
101 +/-40% and +/-25% respective Reach 2 ranges. Adjustments to the hydrologic  
102 classification based on observed inflow may be considered beginning in August.

103 Transition Period (March through April) -- During the Transition Period, average releases  
104 are increased or decreased to achieve the Upper Limit Drawdown (EIS Table 2-3, see  
105 Table 4 below). Under normal operations during the Transition Period, releases would be  
106 limited to a range from 800 cfs to powerplant capacity (4,600 cfs). Under current  
107 projections, the anticipated release is 885 cfs.

#### 108 4. Flaming Gorge Operations with Drought Response during the 2026 Drought Response 109 Operations Plan Year

110 Potential Drought Response Operations were considered by the FGTWG in February  
111 2026 and were included in the group's flow proposal presented at the FGWG on March  
112 11, 2026. Generally, the magnitude and duration of Drought Response Operations will  
113 depend largely on the Yampa River contributions for Reach 2 targets.

114 After consideration of potential Drought Response Operations release scenarios by the  
115 FGTWG and the FGWG, the DROA Parties propose that the volume of Drought  
116 Response Operations release under current conditions, be from approximately 660,000  
117 acre-feet up to approximately 1,000,000 acre-feet<sup>5</sup>.

118 Drought Response Operations will be performed within the operating range for the year's  
119 hydrologic classification. Drought Response Operations must remain within the range  
120 prescribed in the tables for the corresponding hydrologic conditions within the authorized  
121 flexibilities, as described in Section 1 above.

122 Before Spring Peak Releases -- Before the spring flow peak, releases will be ~4,000 cfs  
123 daily average to full power generation.

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<sup>4</sup> <https://coloradoriverrecovery.org/uc/wp-content/uploads/sites/2/2021/11/TechnicalReport-NNA-Bestgen-2016-FR115-140.pdf>

<sup>5</sup> Range of the volume of DROA releases is dependent upon projected hydrology and Yampa River conditions and subject to change as hydrology forecasts and observed hydrology changes.

124 Spring Peak Releases -- The spring peak flow period would likely include a LTSP, which  
 125 will be sustained for multiple days until targets are no longer obtainable. Bypass tubes  
 126 may be used with a ramp-down rate of up to 2,000 cfs/day. Following the LTSP period,  
 127 releases will be ramped-down to 1,000 cfs until the SMB flow spike.

128 Smallmouth Bass Flow Spike -- Following the post-LTSP period, the SMB flow spike  
 129 will occur. This flow spike will consist of a ramp-up to full power plant capacity (about  
 130 4,600 cfs) in one day, an experimental flow of 72-hours' duration maintained at full  
 131 power plant capacity, and a down-ramp at up to 2,000 cfs per day, back down to a release  
 132 rate of 1,500 cfs. The SMB flow spike is predicted to occur between mid-June and early  
 133 July, with timing based on biological triggers.

134 Base Flow Period -- The CPM base flows occur early through late summer, but per the  
 135 2026 FGTWG Proposal, may be extended through the end of the base flow period, after  
 136 consideration of observed inflows and other conditions. In this Plan, base flow targets are  
 137 assumed to be consistent with spring peak target classification.

138 Transition Period -- Average daily releases during the Transition Period are increased or  
 139 decreased to achieve Upper Limit Drawdown (EIS Table 2-3) or other DRO targets. The  
 140 Transition Period may be needed to provide additional Drought Response Operations.

141 Table 1. Difference between Flaming Gorge Operations without Drought Response  
 142 Operations and with Drought Response Operations as of April 2026 24-Month Study  
 143 Modeling.

Operation Period	Flaming Gorge Operation Without Drought Response Operations	Flaming Gorge Operation With Drought Response Operations*	
		660 KAF	1 MAF
Spring Peak LTSP Release-- Release Volume (thousands of acre-feet or kaf) / Peak Release Rate (cfs) and Duration (days)	60 kaf / 4,600 cfs 1 day	243 kaf / 8,600 cfs 7 days	267 kaf / 8,600 cfs 7 days
June inc. SMB Release Volume (kaf) / Peak Release Rate (cfs) / Duration (days)	76 kaf / 4,600 cfs 3 days	100 kaf / 4,600 cfs 3 days	113 kaf / 4,600 cfs 3 days
Summer Base Flow Release Volume (kaf) / Average Release Rate (cfs)	192 kaf / 1,050 cfs	352 kaf / 2,050 cfs	374 kaf / 2,050 cfs

Fall and Winter Base Flow Release Volume (kaf) / Average Release Rate (cfs)	245 kaf / 800 cfs	473 kaf / 1,580 cfs	669kaf / 2,235 cfs
Transition Period Release Volume (kaf) / Average Release Rate (cfs)	107 kaf / 885 cfs	171 kaf / 1,425 cfs	257 kaf / 2,125 cfs
<b>TOTAL Release Volume</b>	<b>680 kaf</b>	<b>1,340 kaf</b>	<b>1,680 kaf</b>

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*\*Release volumes dependent on Yampa River flows to achieve Reach 2 targets.*

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Table 3. End of Month Elevation, Flaming Gorge Operations without Drought Response Operations and with Drought Response Operations as of April 2026 24-Month Study Modeling.

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	Flaming Gorge Elevation Without Drought Response Operations	Flaming Gorge Elevation With Drought Response Operations	
		660 KAF	1 MAF
May-26	6,022.34	6,017.35	6,016.68
Jun-26	6,024.01	6,017.62	6,016.60
Jul-26	6,023.71	6,015.74	6,014.51
Aug-26	6,023.41	6,013.83	6,012.38
Sep-26	6,023.08	6,011.96	6,010.22
Oct-26	6,023.12	6,010.43	6,007.54
Nov-26	6,023.47	6,009.45	6,005.22
Dec-26	6,023.77	6,008.37	6,002.78
Jan-27	6,024.33	6,007.57	6,000.63
Feb-27	6,024.92	6,007.02	5,998.84
Mar-27	6,026.06	6,007.14	5,997.52
Apr-27	6,027.00	6,007.12	5,996.07

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#### 5. Upper Limit Drawdown Level

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In addition to the operating ranges identified in the tables in Appendix 1 to this Attachment, Flaming Gorge has a range of operating elevations that correspond to hydrologic conditions. The Upper Limit Drawdown Level is defined in the 2005 EIS, Table 2-3, provided here in Table 4, and was established to provide safe operation of the reservoir. Generally, to provide adequate flood storage space, Flaming Gorge must be drawn down to at least the elevations in Table 4 by May 1 of each year.

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Table 4 –Upper Limit Drawdown Levels  
for Flaming Gorge Reservoir (2005 EIS  
Table 2.3)

Unregulated Inflow Forecast Percentage Exceedance Range	May 1 Upper Limit Drawdown Elevation Level
1 to 10	6023
10.1 to 30	6024
30.1 to 40	6025
40.1 to 59.9	6027

157

158 6. Lower Drought Response Operations Limit

159 The lower Drought Response Operations limit is a function of hydrologic conditions and  
160 storage water demands necessary on May 1st. At Flaming Gorge, these demands are  
161 primarily releases made for the Recovery Program. Consistent with DROA, the DROA  
162 Parties will continue to monitor elevations throughout the 2026 DROA Plan.

163 7. Drought Response Recovery at Flaming Gorge.

164 There is currently no Drought Response Recovery planned for Flaming Gorge during the  
165 2026 DROA Plan year. As provided in the DROA and herein, the 2026 DROA Plan will  
166 be completed only after storage is recovered.

167 Drought Response Recovery at Flaming Gorge will be completed only when:

- 168 a. The Flaming Gorge Account Balance as defined in Section 6 of the Framework is  
169 zero; or
- 170
- 171 b. Flaming Gorge elevation reaches the May 1 Upper Limit Drawdown Level.  
172 However, this Upper Limit Drawdown Level represents the maximum allowable  
173 elevation for dam safety purposes and operators have typically held a buffer from the  
174 maximum elevation as a prudent reservoir management measure. An evaluation of  
175 operations from 2006 to 2021 demonstrates the regular operating threshold is  
176 typically one-half foot below the May 1 Upper Limit Drawdown Level as shown in  
177 Table 5. When the targets in Table 5 are achieved, recovery will be complete.

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Table 5 – Regular Operation Target  
Elevation

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Unregulated Inflow Forecast Percentage Exceedance Range	Recovery May 1 Elevation Level
1 to 10	6023 (+/-0.5)
10.1 to 30	6024 (+/-0.5)
30.1 to 40	6025 (+/-0.5)
40.1 to 59.9	6027 (+/-0.5)
60.0 to 70	6027 (+/-0.5)
70.1 to 90	6026.75 (+/-0.75)
90.1 to 100	6026.5 (+/-1.0)

179

180 8. Contracts

181 Existing water supply contracts and agreements at Flaming Gorge are described below.  
 182 Any future contracts which become executed will be described here. Water supply  
 183 contracts and agreements are not impaired by any Drought Response Operations because  
 184 the water under contract or agreement is considered unavailable under DROA.

185 i. Daggett County (expires 3/5/2066): 1,000 af/yr

186

187 9. Coordination

188 The Recovery Program provided its flow request to Reclamation on December 11, 2025,  
 189 regarding 2026 FG Operations and generally identified considerations with regard to  
 190 potential Drought Response Operations at Flaming Gorge.

191 The FGTWG discussed Drought Response Operations during its February 2026 meeting.  
 192 The discussions centered around the allowed flexibility of the proposed operation plan  
 193 with and without Drought Response Operations. The FGTWG Proposal, which included  
 194 experiments that considered Drought Response Operation releases, was shared with the  
 195 FGWG on March 9<sup>th</sup>.

196 The FGWG met on March 11<sup>th</sup> and again on April 21<sup>st</sup>.

197 10. Accounting

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199 DROA Releases and Recovery will be accounted for in accordance with Section 6 of the  
 200 DROA Framework. Monthly accounting for current and prior DROA releases and  
 201 recovery at Flaming Gorge can be found here:

202

203 <https://www.usbr.gov/ColoradoRiverBasin/documents/dcp/DROA/DROSummarySheet.pdf>

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As Drought Release Operations will be occurring from Flaming Gorge under the 2026 DROA Plan, there is no Drought Response Recovery planned for Flaming Gorge during the 2026 DROA Plan year.

DRAFT