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March 29, 2002

Ms. Jayne Harkins
Bureau of Reclamation
P.O. Box 61470
Boulder City, Nevada 89006-1470

Re: Comments on the five-year review of the Coordinated Long-Range Operating Criteria for Colorado River Reservoirs

Dear Ms. Harkins:

With Federal Register notices of January 15, 2002 (67 Fed.Reg. 1986, et seq.) and March 6, 2002 (67 Fed.Reg. 10225, et seq.), Reclamation has asked for comments on possible changes to the Long-Range Operating Criteria and solicited comments on public process. We support the Arizona Department of Water Resources in their views that a public meeting is not necessary as part of the process for soliciting comments. We also support the Department's view that no changes to the Long-Range Operating Criteria should be contemplated at this time.

The basic theme of the Department's comments is that the various aspects of the criteria are working well and new developments have been accommodated without creating conflicts with the criteria. We certainly agree.

We have also reviewed the comments of the State of Colorado and the list of issues that Colorado does not concede concerning the status of the criteria and its use in Colorado River operations. While the State of Colorado is entitled to its own view of the Law of the River, the fact that Colorado deemed it necessary to restate those views argues strongly for leaving the criteria alone. The Long-Range Operating Criteria are a set of compromises made among the seven Basin States without conceding legal arguments that might be necessary for one state or another to make in the future. The fact that the criteria have survived over three decades testifies to the wisdom of those who crafted these compromises.

One thought we have not seen expressed is that the criteria are a central part of a status quo on the Colorado River which has allowed negotiations to produce a potential series of solutions

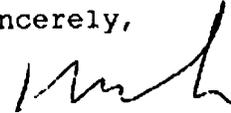
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to California's overuse of Colorado River water. Disturbing that status quo would potentially impair those solutions.

In sum, now is not the time to tinker with over 30 years of successful cooperation.

Thank you for the opportunity to comment on this very important subject.

Sincerely,



Robert S. Lynch
Asst. Secretary/Treasurer

RSL:psr

cc: Nancy Stump, Policy Advisor for Natural Resources, Office of
the Governor
Joseph C. Smith, Director, Arizona Department of Water
Resources
David S. "Sid" Wilson, General Manager, Central Arizona
Water Conservation District
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