

Friends of Lake Powell
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December 6, 2004

Regional Director
Lower Colorado Region
U.S. Bureau of Reclamation
Attention: Jayne Harkins, BCOO-4600
P.O. Box 61470
Boulder City, NV 89006-1470

Dear Ms. Harkins,

The Friends of Lake Powell appreciate the opportunity to provide comments on the 6th review of the Long Range Operating Criteria for the Colorado River reservoirs.

It is our understanding that the Long Range Operating Criteria provide for the coordinated long-range operation of the Colorado River reservoirs for the purposes of complying with the provisions of the Colorado River Compact, the Upper Colorado River Basin Compact, and the Mexican Water Treaty.

Additionally, we understand that a major objective of the 1922 Colorado River Compact is to provide for the equitable division and apportionment of the use of the waters of the Colorado River system.

Comments in Regards to the Long Range Operating Criteria

1. It is critical for the Long Range Operating Criteria for reservoir operations to uphold the intent of the 1922 Compact. The criteria should be flexible and responsive to variations in hydrologic conditions, and should not jeopardize the interests of the Upper Basin.
2. The 1922 Compact anticipating fluctuating hydrologic conditions specified Upper Basin water deliveries as a 10-year progressive series. We note that the existing Long Range Operating Criteria dictate the minimal annual release of 8.23 million acre-ft which is counter to the Article III(d) of the 1922 Compact.
3. We are also concerned that the Long Range Operating Criteria contain a requirement to equalize Lake Mead with Lake Powell during times of Upper Basin water surpluses but that there are no provisions to equalize the level of Lake Powell with Lake Mead during times of Upper Basin drought for so long as the Upper Basin is conditionally satisfying its 10-year water delivery obligations.

4. Presently, there exists a large imbalance between the water volumes in Lake Mead and Lake Powell (14.3 maf to 8.8 maf), which have jeopardized the interests of the Upper Basin and put at risk the future generation of hydroelectric power at Glen Canyon Dam.
5. Over the past 10 years, the Upper Basin has delivered more than 100 million acre-feet of water to the Lower Basin, which now in combination with drought conditions has prejudiced the interests of the Upper Basin.
6. **As such, the existing Long Range Operating Criteria need clarification that the minimal objective release of 8.23 million acre-feet stated in Long Range Operating Criteria is an 'operating target' which is subject to revision in the Annual Operating Plan (AOP) process.**
7. The Friends of Lake Powell strongly endorse the Annual Operating Plan (AOP) process. Furthermore, we believe that operation of the Colorado River reservoirs can be optimized with each Basin sharing more equitably in the burden of drought. This would be best be accomplished by maintaining, as equally as practicable, the active water stored in Lake Powell and Lake Mead (for so long as Upper Basin 10-year water delivery obligations are satisfied).

We note that the existing Long Range Operating Criteria have prejudiced the position of the Upper Basin and have put the generation of hydroelectric power from Glen Canyon Dam in jeopardy. The low level of Lake Powell affects many stakeholders and this includes impacts to:

- CRSP power customers, who include over 200 different customers and power marketing entities
- The City of Page drinking water supply
- The Navajo Generating Station cooling water supply
- Infrastructure at the Glen Canyon National Recreational Area
- Lake Powell recreational interests, and
- Upstream consumptive uses hastened by a potential 'call of the river'

In addition to these stakeholder interests, there are further potential negative impacts associated with a drop in Lake Powell below the minimal power pool elevation:

- The CRSP Basin Fund would become insolvent by 2007
- Environmental Projects – 756 NEPA and ESA decisions could be reopened

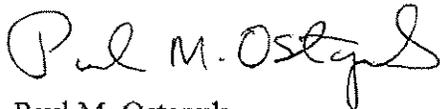
- Problems associated with increased salinity discharge due to low reservoir levels
- Compromises to the electrical grid system including 'black start' capability, restricted power imports due to inadequate voltage support, the need to replace regulated power and spinning reserve and the termination of the Salt River Project transmission exchange agreement

In summary, the ongoing drought has put stress on the Colorado River water system. It is our expectation that future "Annual Operating Plans" will contain more flexible water delivery provisions that not only will meet the general guidance of the "Long Range Operating Criteria" but will allow a more flexible response to changing hydrologic conditions, so as not to unfairly prejudice the position of the Upper Basin.

Using the AOP process, we believe that the U.S.B.R. can equitably manage the Colorado River both in times of water surpluses and extreme droughts while simultaneously honoring the delivery intent of the 1922 Compact.

Thank you for the opportunity to comment on these important matters.

Sincerely,



Paul M. Ostapuk
Friends of Lake Powell