



# Dolores Water Conservancy District

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May 1, 2020

Malcolm Wilson, Bureau of Reclamation, Upper Colorado Basin

Carly Jerla, Bureau of Reclamation, Lower Colorado Basin

Managers for the Review of the 2007 Interim Guidelines

[7DReview@usbr.gov](mailto:7DReview@usbr.gov)

Re: Reclamation's 7.D. Review of the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead (2007 Interim Guidelines)

Dear Mr. Wilson & Ms. Jerla:

Thank you for the opportunity to provide input into your upcoming review of the 2007 Interim Guidelines. On your webinar presentation in March 2020, you presented your proposed work plan to review the 2007 Interim Guidelines. Specifically, you intend to evaluate the effectiveness of the 2007 Interim Guidelines and document Reclamation's operational experience. The evaluation of effectiveness will look at the adherence of common themes and the three stated purposes of the 2007 Interim Guidelines.

It would appear to be an evaluation without a comparison or contrast to a common baseline. The previous existing operational criteria used prior to the 2007 Interim Guidelines, Criteria For Coordinated Long-Range Operation Of Colorado River Reservoirs (LROC), would be a logical alternative scenario as a default baseline case.

The 2007 Interim Guidelines intended to address multiple concerns that are expected to be captured in your proposed evaluation, but would otherwise not be juxtaposed against the previously utilized process to fuller inform future decisions.

Therefore, it would be helpful to Colorado Basin water rights holders how LROC, the previously utilized process, would have looked as an alternative to the current temporary operational rules. This comparison could highlight how LROC might have accomplished or missed similar benefits or impacts from the current operations. This LROC contrast would also provide a useful comparison to the effectiveness captured in your currently planned review, such as coordinated reservoir operations of Lake Powell and Lake Mead.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Curtis III", with a stylized flourish at the end.

Kenneth W. Curtis III  
General Manager  
Dolores Water Conservancy District