

## Central Utah Water Conservancy District 7.D. Review Scope Comments

Central Utah Water Conservancy District appreciates the opportunity Reclamation has provided to submit comments regarding the upcoming 7.D Review. We recognize the challenges Reclamation faces in accomplishing this task, and the relatively short window for producing the report. We support Reclamations efforts in its completion as a meaningful tool for future deliberations.

Reclamation has indicated the scope of the 7.D Review will be to evaluate effectiveness of the 2007 Interim Guidelines related to the December 2007 ROD and to document operational experience. Please consider the following comments in context of the charge and scope that Reclamation has been given.

**COMMENT 1:** The 2007 IG appear to be vulnerable to manipulation of flow release tiers according to downstream uses – as demonstrated by the identification of a “sweet spot”, where it appears efforts may have been made to keep Powell releases in the 9 million-acre-feet regime. That this can happen under the 2007 IG guidelines does not seem effective in encouraging conservation. This also has an impact on shortage planning.

Section 6 of the ROD indicates “The objective of the operations of Lake Powell and Lake Mead as described herein is to avoid curtailment of uses in the Upper Basin, minimize shortages in the Lower Basin and not adversely affect the yield for development available in the Upper Basin”. It would be helpful for CUWCD to understand how the impact of operating under the 2007 IG either increased or decreased the risk of Upper Basin curtailment.

**COMMENT 2:** Without performing a retrospective analysis of operations under the 2007 IG versus operation under LROC, an evaluation of effectiveness of the 2007 IG will be of limited value. We recommend Reclamation perform a comparative analysis of operation, storage, and deliver of the system under the 2007 IG versus where the system would be today under the same hydrologic and demand conditions but following the LROC operation criteria.

**COMMENT 3:** Based on coordinated operations of Mead and Powell, and projected hydrology and demand, it is our understanding that the 2007 IG were developed with the intent to result in average delivery of 8.23 million-acre-feet, allowing for some higher and lower deliveries; however, 24-month model predictions always overestimate Powell elevations resulting in higher releases than reality demands, without mechanisms in the 2007 IG to make corrections after projections have been established and release rates set. The 7.D review should include a discussion regarding the impact of setting releases according to projections, five months in advance, and absent mechanisms to correct for actual reservoir elevations.

Also, please include a discussion in the 7.D review report of what the impacts of the April adjustments have been in terms of storage/releases.

**COMMENT 4:** Section III.B.4 of Attachment A2 to the Agreement Concerning Colorado River Drought Contingency management and Operations (“Companion Agreement”) indicates “The Parties acknowledge and expect that operation and implementation of an Upper Basin Demand Management Program following the Term of this Demand Management Storage Agreement will be informed by and considered as part of the Secretary’s formal review to evaluate the effectiveness of the 2007 Interim Guidelines in consultation with the seven Colorado River Basin States...” . Although an Upper Basin Demand Management Program has not yet been established, we anticipate this will be included in the 7.D review. CUWCD recommends consideration be given to the effectiveness of the 500,000-acre-foot limitation in CRSP reservoirs, and its adequacy in reducing risk of shortages and curtailment.