

---

---

Click Next to begin the Comment Form.

---

---

## Commenter Information (Optional)

Before including your address, telephone number, electronic mail address, or other personally identifiable information in your comments, please be aware that because of federal disclosure requirements your entire comment (including your personally identifiable information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we will comply with all applicable disclosure requirements, and cannot guarantee that we will be able to do so.

### 1. Name

### 2. Email

### 3. Please let us know if you would like to:

- Be added to the 7.D. email list (enter email in Question 2)
- Provide feedback regarding your experience using this Form (enter email in Question 2)

### 4. Organization/Entity

Central Utah Water Conservancy District

5. Please identify the sector that most closely describes your entity:

- Local Government
- State Government
- Tribal Government
- Federal Government
- Agricultural Water Provider/Association
- Municipal Water Provider/Association
- Non-Governmental Organization
- Academic Institution
- Both municipal and agricultural

### General Comments on the Draft Report

Please provide your overall feedback on the Draft Report  
 ([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)  
 ([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

6. Please respond to the following statements:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
The Draft Report is understandable.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Draft Report's conclusions are supported.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 7. Please provide general comments on the Draft Report:

*(4,000 character limit)*

We appreciate Reclamation's effort in preparing the Draft Report of the Review of the 2007 Interim Guidelines (7.D Review). As Reclamation embarked on this effort last Spring, comments on the planned approach for developing the report were solicited. Central Utah Water Conservancy District (CUWCD) submitted comments at that time, requesting consideration be given to four items. Upon review of the Draft report, we were pleased to observe most of these items had been addressed. However, it was clear that our request for a retrospective analysis of operations under the 2007 Interim Guidelines versus operation under the Long-Range Operating Criteria (LROC) was not addressed. We acknowledge, as indicated under Section 6 of the draft report that "Reclamation anticipates focusing more" on these types of comments. We recognize Reclamation had a limited window to complete this review and this type of analysis could not likely be completed in the timeframe provided. Given the limited timeframe, we suggest the report include a discussion of how, when, and if the retrospective analysis will be performed. We view this as fundamental to determining the effectiveness of the Interim Guidelines. We feel the effectiveness of the Interim Guidelines as identified in the ROD must be compared against the baseline that would have been in-place (LROC) had the Interim Guidelines not been implemented. Without performing this comparative analysis, we believe the standard for determining effectiveness is subjective. We have heard reports that Lake Powell may have had significantly more water in storage than it does now had the LROC been followed in place of the Interim Guidelines. We have not yet verified this, but if it can be substantiated, it would indicate the Interim Guidelines have increased the Upper Basin's risk of curtailment, which does not support "avoid[ing] the risk of curtailments in the Upper Basin" as indicated in the ROD. We have heard similar comments indicating the amount of storage in Powell would have been lower than it is now had the LROC been followed in place of the Interim Guidelines. These contradictions should be explored through the proposed retroactive analysis. Section 7.3 indicates the objectives of Section XI.G.6 of the ROD are "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 seems possible only one of these objectives has been met, and further evaluation should be completed to better articulate how effective the 2007 Interim Guidelines were in accomplishing each. If the 2007 Interim Guidelines are the starting point for the upcoming renegotiations, we believe the Basin States will require an understanding of how the results of these guidelines compare to what the storage status of the main stem reservoirs may have been if the guidelines had not been implemented. Further, its effectiveness should not be subjectively compared to itself rather than the LROC baseline. As evidenced in the Draft Report, Reclamation has done an outstanding job implementing the 2007 Interim Guidelines and gained valuable operating experience. We also acknowledge and are grateful for the significant effort and obligation of resources made by our Lower Basin counterparts in reducing depletions and believe we will all be better informed by the requested analysis. We appreciate the opportunity to provide comments on this Draft Report. We are happy to discuss our comments further if you have questions or seek further clarification. Sincerely,  
Gene Shawcroft, P.E. General Manager/CEO

## Section 1: Introduction

Refer to Section 1, page 1 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

8. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 1 is clear and understandable.	<input type="radio"/>				

9. Are there any errors or is critical information missing in Section 1?

Yes

No

10. Please provide comments on Section 1 that support your responses above:

*(4,000 character limit)*

---

## Section 2: Background on the Development of the Guidelines

Refer to Section 2, pages 2-3 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

11. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 2 is clear and understandable.	<input type="radio"/>				

12. Are there any errors or is critical information missing in Section 2?

Yes

No

13. Please provide comments on Section 2 that support your responses above:

*(4,000 character limit)*

---

### Section 3: Purpose of the Guidelines and Common Themes

Refer to Section 3, pages 4-5 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

14. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 3 is clear and understandable.	<input type="radio"/>				

15. Are there any errors or is critical information missing in Section 3?

Yes

No

16. Please provide comments on Section 3 that support your responses above:

*(4,000 character limit)*

## Section 4: Complementary Activities Since Adoption of the Guidelines

Refer to Section 4, pages 5-9 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

17. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 4 is clear and understandable.	<input type="radio"/>				

18. Are there any errors or is critical information missing in Section 4?

- Yes
- No

19. Please provide comments on Section 4 that support your responses above:

*(4,000 character limit)*

## Section 5: Approach to the Review of the Guidelines

Refer to Section 5, page 10 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

20. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 5 is clear and understandable.	<input type="radio"/>				

21. Are there any errors or is critical information missing in Section 5?

Yes

No

22. Please provide comments on Section 5 that support your responses above:

*(4,000 character limit)*

## Section 6: Significant Considerations Based on Scope and Approach Comments

Refer to Section 6, pages 10-13 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

23. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 6 is clear and understandable.	<input type="radio"/>				

24. Are there any errors or is critical information missing in Section 6?

Yes

No

25. Please provide comments on Section 6 that support your responses above:

*(4,000 character limit)*

## Section 7: Implementation of the Guidelines

Refer to Section 7, pages 13-39 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

26. Please respond to the following statement regarding Section 7.1 - Overview of Lake Powell and Lake Mead Conditions:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.1 is clear and understandable.	<input type="radio"/>				

27. Are there any errors or is critical information missing in Section 7.1?

Yes

No

28. Please provide comments on Section 7.1 that support your responses above:

*(4,000 character limit)*

29. Please respond to the following statement regarding Section 7.2 - Determination of Lake Powell and Lake Mead Operations:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.2 is clear and understandable.	<input type="radio"/>				

30. Are there any errors or is critical information missing in Section 7.2?

- Yes
- No

31. Please provide comments on Section 7.2 that support your responses above:  
(4,000 character limit)

32. Please respond to the following statement regarding Section 7.3 - Coordinated Operation of Lake Powell and Lake Mead:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.3 is clear and understandable.	<input type="radio"/>				

33. Are there any errors or is critical information missing in Section 7.3?

- Yes
- No

34. Please provide comments on Section 7.3 that support your responses above:  
(4,000 character limit)

35. Please respond to the following statement regarding Section 7.4 - Lake Mead Operations:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.4 is clear and understandable.	<input type="radio"/>				

36. Are there any errors or is critical information missing in Section 7.4?

Yes

No

37. Please provide comments on Section 7.4 that support your responses above:  
(4,000 character limit)

38. Please respond to the following statement regarding Section 7.5 - Intentionally Created Surplus:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.5 is clear and understandable.	<input type="radio"/>				

39. Are there any errors or is critical information missing in Section 7.5?

Yes

No

40. Please provide comments on Section 7.5 that support your responses above:

*(4,000 character limit)*

41. Please respond to the following statement regarding Section 7.6 - Process and Consultation:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 7.6 is clear and understandable.	<input type="radio"/>				

42. Are there any errors or is critical information missing in Section 7.6?

Yes

No

43. Please provide comments on Section 7.6 that support your responses above:

*(4,000 character limit)*

---

## Section 8: Effectiveness of the Guidelines

Refer to Section 8, pages 39-42 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

44. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 8 is clear and understandable.	<input type="radio"/>				

45. Are there any errors or is critical information missing in Section 8?

- Yes
- No

46. Please provide comments on Section 8 that support your responses above:

*(4,000 character limit)*

---

## Section 9: Summary

Refer to Section 9, page 42 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

47. Please respond to the following statement:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section 9 is clear and understandable.	<input type="radio"/>				

48. Are there any errors or is critical information missing in Section 9?

Yes

No

49. Please provide comments on Section 9 that support your responses above:

*(4,000 character limit)*

---

## Appendix A - Operational Documentation

Refer to Appendix A of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftAppendixA\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf) ([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftAppendixA\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf))).

50. Please respond to the following statement regarding Section A.2 - 24-Month Study Background:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.2 is clear and understandable.	<input type="radio"/>				

51. Are there any errors or is critical information missing in Section A.2?

Yes

No

52. Please provide comments on Section A.2 that support your responses above:

*(4,000 character limit)*

53. Please respond to the following statement regarding Section A.3 - Review of Operations:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.3 is clear and understandable.	<input type="radio"/>				

54. Are there any errors or is critical information missing in Section A.3?

- Yes
- No

55. Please provide comments on Section A.3 that support your responses above:  
(4,000 character limit)

56. Please respond to the following statement regarding Section A.4 - 24-Month Study Accuracy:

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Section A.4 is clear and understandable.	<input type="radio"/>				

57. Are there any errors or is critical information missing in Section A.4?

- Yes
- No

58. Please provide comments on Section A.4 that support your responses above:

*(4,000 character limit)*

