

---

---

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

Western Area Power Administration Colorado River Storage Project (CRSP) Management Center

### 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

WAPA-CRSP

#### 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
- Other

### 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 type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| The Draft Report's conclusions are supported. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

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

*(4,000 character limit)*

Throughout the Draft Report, there is no reported information regarding the production of hydropower at Glen Canyon Dam (GCD). In its May 1, 2020 letter addressing the scope of the 7.D. report, WAPA cited one of Reclamation's main goals of this report is to review "the effectiveness of the three stated purposes of the 2007 Interim Guidelines." Specifically, "considering the effects on water storage in Lake Powell and Lake Mead, and on . . . power production. . . ." We continue to seek the addition of hydropower related data in the report. WAPA believes any report that strives to consider the effect of water storage on Lake Powell and Lake Mead that does not include a robust discussion of the effects on hydropower production is necessarily deficient and fails to meet the goals of the document. WAPA specifically offered in its May 1, 2020, letter "to provide Reclamation with summary data on hydropower production (such as electrical energy generated, monthly generation capacity, economic value by power plant, and system-wide electric power issues) since implementation of the 2007 Interim Guidelines." As WAPA offered to provide appropriate assistance to Reclamation, it will provide hydropower values for consideration in the final report under separate correspondence outside of this form. Note that WAPA is not proposing that this report analyze the "impact" of the 2007 Interim Guidelines on GCD hydropower, just that the GCD hydropower be reported and its year-by-year variations in production be discussed.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

As discussed in this section, when developing the Guidelines the use of the CRSS modeling was integral in identifying future Colorado River conditions and the effects of each alternative on various resources. "CRSS modeling provided the basis for the analysis of potential future Colorado River system conditions (such as, reservoir elevations, reservoir releases, river flows), as well as the potential effects of each alternative on resources such as recreation, biology, and electrical power." Given the importance of this consideration when

developing the guidelines, we believe this further supports WAPA's request to include hydropower data in the report, and believe the report is incomplete without it.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

As stated in the first purpose statement, the Guidelines are intended to assist in "improv(ing) Reclamation's management of the Colorado River by considering ... the effects of water storage in Lake Powell and Lake Mead, and... on ... power production." Under the CRSP Act of 1956, electric power is an authorized purpose, and Reclamation is required by law to consider power production as such. Therefore, a description of electric power production during the implementation of the Interim Guidelines is necessary.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

Two of the Operational Agreements discussed in this section, the Long Term Experimental and Management Plan (LTEMP) and the Drought Contingency Plan (DCP) include a heavy interest in hydropower production and coordination. One of the stated purposes of the 2016 LTEMP is to "...maintain or improve hydropower production to the greatest extent practicable..." among other things. The monthly and yearly hydrographs in the LTEMP are based on the Guidelines and are closely coordinated with WAPA. The DCP is heavily based on the avoidance of reducing Lake Powell reservoir below the minimum power pool level, and establishing a plan for coordinated operations of the Dams/hydropower to ensure this is goal is achieved. Both of these significant and important operational documents have required partnerships and coordination with WAPA as it relates to discussions and decisions related to the hydropower resource, as such, not including the hydropower data would result in an incomplete evaluation.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

One of the goals of the 7.D. review is to "2) document the operational experience under the Guidelines from 2008 - 2019." Electric power production and its relationship to Lake Powell and Hoover elevation should be quantitatively documented in this report.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

6.2 Resource Analysis: Reclamation states that it received comments proposing that "further analysis" needs to be done on "environmental, biological, recreational and hydropower resources" and that resource "impact studies" should be performed. WAPA is not proposing an impact analysis be performed, rather we believe that a tabulation of hydropower production, and how hydropower production has differed by time period and has changed in response to other resources such as Lake Powell elevation and hydropower releases from GCD and Hoover, be included.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

We propose that Section 7.3 include a subsection describing Federal hydropower production. It could describe the important relationship between lake elevations and water releases, and hydropower production at both Lake Powell and Lake Mead as an important consideration of coordinated operations. This section should also include a table that would quantitatively compare the production of hydropower at the two Federal dams similar to the tables that currently exist in the report that document water releases under the preferred alternative in the EIS and actual operations.

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.



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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)*

WAPA believes the conclusion is incomplete given the lack of hydropower related data. Reclamation's success in mitigating risks to the Basin over the last 12 years is a result of operations under the Guidelines, but is also largely in part to the inclusion of various operating agreements. Given hydropower's strong relationship and presence in the operations of those agreements, not including hydropower data in the conclusion of the effectiveness of the Guidelines results in an incomplete analysis.

## 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"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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-](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](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.

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
|  | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <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)

A.2.2.3 WAPA's operators provide regular and timely data to the BOR water operators each month which is included in various modeling runs and their associated outputs. This hydropower related information is an important element in the overall analysis and should be included.

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

Section A.3 is clear and understandable.

|  | Strongly Agree        | Agree                 | Neutral               | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
|  | <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)*

