



# UPPER COLORADO RIVER COMMISSION

(18)

355 South 400 East • Salt Lake City • Utah 84111 • 801-531-1150 • FAX 801-531-9705

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:

On behalf of the Upper Colorado River Commission, we wish to respond to the Federal Register Notice for public comment on the review of the existing Coordinated Long Range Operating Criteria, (LROC), for Colorado River Reservoirs.

We do not object to the changes proposed in the federal register. However, we also wish to make the following additional comments regarding the content of the existing LROC.

The Commission does not endorse the assumption and objective in the LROC of a minimum release of water from Lake Powell of 8.23 million acre-feet every year. To date, no lower basin use and supply data have been presented to show that this release volume is required in accordance with the Compact. If such a number is used in the LROC, it must be understood that this is a planning objective which may be modified in the Annual Operating Plan to reflect current conditions and in accordance with Compact requirements.

We remain concerned about the drought and depletion of storage at Lake Powell. It is imperative that the LROC be interpreted to have sufficient flexibility to allow for modifications in the AOP as needed to reflect critical conditions and compact requirements. The Commission supports review of the LROC in accordance with the process and schedule in the Colorado River Basin Project Act of 1968. Decisions regarding the timing for the next review should be left open, as it may be necessary to begin the next review prior to the time suggested at the public hearing. Thank you for the opportunity to comment. Please do not hesitate to contact me if you have questions.

Sincerely,

Don A. Ostler, P.E.  
Executive Director and Secretary

cc: Upper Division Commissioners