



State of Utah

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Natural Resources

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Dec 4, 2004

Attention: BCOO-4600
Mr. Robert W. Johnson
Regional Director
Lower Colorado Regional Office
U.S. Bureau of Reclamation
P.O. Box 61470
Boulder City, Nevada 89006-1470

Mr. Johnson:

This letter is an update of Utah's response to the January 15, 2002, March 6, 2002 and November 3, 2004 Federal Register notices concerning the 6th review of the Long Range Operating Criteria (LROC) for the Colorado River reservoir operations.

Since the last review of the LROC, the Secretary of the Interior, in consultation with the 7 Colorado River Basin States, has adopted the Colorado River Interim Surplus Guidelines (ISG) for the Lower Colorado River. The process to implement the ISG included a substantial EIS process which allowed the 7 Colorado River Basin States and other interested stake holders as well as the public to provide comment and input. Given this extensive process and the fact the ISG will be in place till 2016, it would be premature to evaluate the results of the ISG and recommend substantive changes to the LROC. The technical changes proposed in the current LROC review seem to make sense in order to keep the document current with regards to updated legislation and rules.

With the current drought and the ongoing discussions by the 7 Colorado River Basin states as to how to cope with low storage levels in the system, it would be appropriate for this review of the LROC to serve as the current review for at least the next five years. During this time the 7 Basin states will be working together to provide additional guidelines dealing with shortages. Similar to the ISG process, if and when shortage guidelines are agreed to and given time to develop operational experience, it would be appropriate to again review the Long Range Operating Criteria.

Thank you,

D. Larry Anderson, P.E.
Director

cc: Robert Morgan
Seven Basin States Representatives