

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

December 6, 2004

VIA FACSIMILE

Mr. Robert W. Johnson
Regional Director
Lower Colorado Regional Office
U.S. Bureau of Reclamation
P.O. Box 61479
Boulder City, NV 89006-1470

Dear Mr. Johnson:

Proposed Decision Regarding Colorado River Reservoirs' Long-range Operating Criteria

Metropolitan appreciates the opportunity to submit comments on the Bureau of Reclamation's proposed decision regarding modifications to the Criteria for Coordinated Long-range Operation of Colorado River Reservoirs specified in the November 3, 2004 Federal Register. Metropolitan concurs with the December 1, 2004 comments submitted by the Colorado River Board of California on this matter.

In particular, Metropolitan urges Reclamation not to commit to a five-year hiatus in beginning the next review of the Operating Criteria. The Colorado River Basin Project Act (Act) of 1968 allows the Secretary to modify the Operating Criteria as a result of actual operating experience or unforeseen circumstances to better achieve the purposes of Section 602(a) of the Act, after appropriate consultation with representatives of the Governors of the Colorado River Basin states. The Operating Criteria indicate that the Secretary will sponsor a formal review at least every five years. The current review began January 15, 2002. A five-year hiatus prior to beginning the next review would amount to an eight-year period between reviews, while the Operating Criteria commit to a review at least every five years. Metropolitan believes that Reclamation should leave open the date that the next review will commence, basing that date instead upon actual operating experience or unforeseen circumstances.

Very truly yours,

Stephen N. Arakawa
Manager, Water Resource Management

JPM:adminwrm

o:\asvc\JPM_Comments on Proposed Decision re Long Range Operating Criteria.doc