



MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

March 28, 2002

VIA FACSIMILE

Regional Director
Attn: BCOO—4600
Lower Colorado Region
Bureau of Reclamation
P.O. Box 61470
Boulder City, Nevada 89006-1470

Comments on Review of Long-range Operating Criteria for Colorado River Reservoirs

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity, as a potentially affected public agency, to submit comments on whether the Criteria for Coordinated Long-range Operation of Colorado River Reservoirs (Criteria) should be modified, and if so, how they should be modified. The Bureau of Reclamation's (Reclamation) notice published in the Federal Register on March 15, 2002 stated that Reclamation is extending the comment period for written comments through March 29, 2002.

The Department of the Interior's notice, published in the Federal Register on January 25, 2001, notified the public that the Secretary of the Interior (Secretary) signed the Record of Decision on the "Colorado River Interim Surplus Guidelines; Final Environmental Impact Statement". The Interim Surplus Guidelines (Guidelines) are being used annually to determine the conditions under which the Secretary would declare the availability of surplus water for use within the states of Arizona, California, and Nevada. The Guidelines are consistent with both the decree entered by the U.S. Supreme Court in 1964 in the case of Arizona v. California and Article III (b) of the Criteria. As long as the Guidelines remain in effect for the period covered by the current Review of the Criteria, Metropolitan is of the opinion that the Criteria do not need to be modified.

It is expected that Metropolitan, Imperial Irrigation District, and Coachella Valley Water District will execute a Quantification Settlement Agreement and related documents by December 31, 2002. Should a Quantification Settlement Agreement not be executed by that date, Metropolitan believes the Criteria should be reviewed to determine whether they should be modified to better achieve the purposes of the Colorado River Compact.

Very truly yours,

Stephen N. Arakawa, Manager
Water Resource Management

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**cc: Mr. Gerald R. Zimmerman
Executive Director
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