



UPPER COLORADO RIVER COMMISSION

355 South 400 East • Salt Lake City • Utah 84111 • 801-531-1150
website: www.ucrccommission.com

September 19, 2018

The Honorable Ryan Zinke
Secretary of the Interior
United States Department of Interior
1849 C Street NW
Washington, DC 20240

Re: Implications of Department of the Interior Reorganization for the Upper Colorado River Basin

Dear Secretary Zinke:

We, the undersigned, are the designated Governors' representatives of the four Upper Colorado River Division States of Colorado, New Mexico, Utah and Wyoming on the Upper Colorado River Commission ("Commission"). The Commission was formed in 1948 pursuant to the Upper Colorado River Basin Compact ("1948 Compact") which was ratified by the legislatures of each of the signatory states and approved by Congress. 63 Stat. 31. We understand that you are in the process of finalizing the proposed reorganization of Department of the Interior agencies and programs. In particular, we respectfully request that Glen Canyon Dam, Lake Powell and Lee Ferry, including the Paria River, remain under the operational control of the Upper Colorado Region ("UC Region") of the Bureau of Reclamation.

For almost 100 years, the Colorado River has been administered as two discrete basins. Under the 1922 Compact, 45 Stat. 1057, the Upper Basin includes the drainage above Lee Ferry, Arizona, a point on the main stream of the Colorado River approximately 16 miles below Glen Canyon Dam and one mile below the Paria River and the Lower Basin includes the drainage below Lee Ferry. The Upper Division States are obligated not to deplete an aggregate of 75,000,000 acre-feet of water during any consecutive ten-year period at Lee Ferry. Lake Powell, created by Glen Canyon Dam (both of which are currently operated by Reclamation's UC Region) benefits the Upper Basin wherein water administration is left to the states. Conversely, you serve as the water master in the Lower Basin and deliver main stream water, through Reclamation's Lower Colorado Region, to Lower Basin water users pursuant to controlling authorities. With a limited water supply, especially during the continuing drought, locating Glen Canyon Dam, Lake Powell and Lee Ferry in the proposed Lower Colorado Basin Region may create tension and conflict between Reclamation's obligations to the Upper Basin as compared to its obligations in the Lower Basin.

According to the Department's most recent "unified region boundary" maps comprised of 12 distinct regions ([https:// www.doi.gov/employees/reorg/unified-regional-boundaries](https://www.doi.gov/employees/reorg/unified-regional-boundaries)), Glen Canyon Dam appears to fall under the jurisdiction of the Lower Colorado Basin Region (Region 8), rather than within the Upper Colorado

Basin Region (Region 7). Given the importance of Glen Canyon Dam, Lake Powell and Lee Ferry to the Upper Division States, all three should remain under the operational control of the UC Region, or proposed Upper Colorado Basin Region 7.

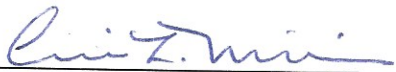
The UC Region of Reclamation has been managing Glen Canyon Dam and Lake Powell since their construction and therefore has special institutional knowledge and expertise that bear directly on the operations of the Upper Basin in accordance with the Law of the River, that compendium of laws, regulations and policies that has governed the management of the Colorado River since 1922. Shifting responsibility for Glen Canyon Dam to the Lower Colorado Basin Region could result in a loss of Upper Basin expertise that would jeopardize the interests of the Upper Division States generally, and introduces the potential to impair or diminish Reclamation's independent obligations to the Upper Basin. This is especially relevant as the Upper Basin continues drought contingency planning efforts and prepares to renegotiate the 2007 Interim Guidelines for Coordinated Operations of Lakes Powell and Mead, both of which involve close coordination and involvement with Reclamation.

Moreover, while the majority of the proposed 12 regions, including the Upper Colorado Basin Region, are drawn according to state-line boundaries, several other regions depart from a pure state-line demarcation (e.g. Regions 5, 8, 9 and 10). Due to the importance of Glen Canyon Dam, Lake Powell and Lee Ferry to the Upper Division States, we request that Region 7 be drawn to include all three features.

We appreciate the efforts of the Administration and the Department of the Interior, in particular, to maximize the organizational efficiency of the Department. To that end, we believe that the most efficient and effective approach will include Glen Canyon Dam, Lake Powell and Lee Ferry, including the Paria River, within the Upper Colorado Basin Region 7 in the proposed reorganization.

Thank you for your consideration.

Sincerely,



ERIC L. MILLIS
State of Utah



PATRICK T. TYRRELL
State of Wyoming



TOM BLAINE
State of New Mexico



L. JAMES EKLUND
State of Colorado