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January 3, 2018

Memorandum

To: Dolores Water Conservancy District - Board and Staff
Montezuma Valley Irrigation Company - Board and Staff
From: Carrie Padgett and Steve Harris, Harris Water Engineering, Inc.

Re: Bureau of Reclamation Review Comments on the Draft Dolores Project Drought Contingency Plan

The final draft Plan was submitted to the Bureau of Reclamation (Reclamation) on November 20, 2017. Reclamation provided comments on the December 20, 2017 on the draft Plan.

Members of the Planning Task Force and HWE met in late December to discuss the comments and developed responses to these comments. Attached are the comments from Reclamation and a summary, including page number, of the proposed responses (response to comments are shown in **bold font and underlined**). Responses to the comments were incorporated into the final draft of the Plan as track changes. All track changes are shown in the attached version of the draft Plan.

Below is the timeline for the remaining three months of the grant agreement period. The boards will then review any comments from Reclamation prior to formal acceptance of the Plan by March 2018.

Month	Activities	Date(s)
January 2018	✓ Boards review any comments provided by Bureau of Reclamation; possible Boards' action of acceptance of the Plan	DWCD Board Meeting – 1/9 MVIC Board Meeting – 1/11
February 2018	✓ Possible Boards' action of acceptance of the Plan	DWCD Board Meeting – 2/8 MVIC Board Meeting – 2/13
March 2018	✓ Final Plan due to Bureau of Reclamation	Due By – 3/31

Comments Received from the Bureau of Reclamation

Subject: Review Comments for the Dolores Project Drought Contingency Plan
(R15AC00083)

The Bureau of Reclamation received a copy of the Dolores Project Drought Contingency Plan on November 20, 2017. In response, Reclamation established a team to review the plan pursuant to Reclamation's Temporary Directives and Standards (WTR TRMR-110) for the Drought Response Program. Overall, the review team found that the plan included an excellent description of the planning area and history of the water users, and generally meets program requirements. However, there are items related to the program requirements that must be addressed before the plan can be accepted, in accordance with the review team's findings:

1. WTR TRMR-110 6.D.(1)(a) requires that each drought contingency plan identify metrics and triggers that will be used to define drought, stages of a drought, and trigger implementation of mitigation or response actions. The draft plan identifies the Dolores Water Conservancy District's (District) Dolores Project Allocation Sheet as the driver for calculating water shortages, and identifies the data sources (e.g., SNOTEL sites, river gages) that the allocation sheet relies on. However, it is not immediately clear what indices or triggers are being used to define stages of drought. Please revise the plan to concisely explain in the drought monitoring section, how the District predicts or confirms droughts including information from Section 6.2, and what indices or triggers are being used to define stages of drought.

Response: A new section was added to Section 3 – Drought Monitoring. This new section starts on page 36 of the attached draft Plan. This new section describes the Dolores Project allocations, references section 6.2, and provides a timeline showing when drought warnings may occur.

2. WTR TRMR-110 6.D.(1)(b) describes the requirements related to vulnerability assessments, which are one of the six required elements of a drought contingency plan under the program.
 - a. WTR TRMR-110 6.D.(1)(b) states that each plan must include a vulnerability assessment evaluating the risks and impacts of drought.
 - i. Section 4.1.1 of the draft plan describes the loss of alfalfa production during drought for the Ute Mountain Ute Tribe Farm and Ranch Enterprise. However, similar to the discussion on the "FSA irrigators," there exists an opportunity to describe in more detail the impact and effects of this loss on the Tribe and the tribal farm and ranch enterprise. Please revise the plan to further describe these impacts.

Response: Additional detail was proved on FRE vulnerabilities to drought on page 46.

- ii. In addition, while Municipal & Industrial (M&I) water users do not share in water shortages in the same manner as the other water users, it would be ideal if there were more context describing the rationale for not considering these users in the vulnerability assessment or development of

mitigation and response actions. If possible, please reference any existing documents that do consider potential impacts of drought on M&I water supplies in the planning area.

Response: A new section was added, Section 4.1.6, to describe why M&I allocations do not share in shortages on page 55.

- iii. Please also revise Section 4.1.4.2 of the draft plan to provide more information on the composition and objectives of the Dolores River Native Fish Monitoring & Recommendation Team, and the Biology Committee.

Response: Additional details on the Biology Committee and the Dolores River Native Fish Monitoring and Recommendation Team were added to section 4.1.4.2, starting on page 53.

- b. WTR TRMR-110 6.D.(1)(b) states that vulnerability assessments will be based on a range of future conditions and that these assessments will drive the development of potential mitigation and response actions. Please describe in the revised plan how the information and analysis described in Section 4.4, Assessment of Climate Change on Future Risk, was applied and considered in the remainder of the analysis (i.e., in the development of mitigation and response actions).

Response: Additional details within Section 4.4, Assessment of Climate Change on Future Risk, were added starting on page 64.

3. WTR TRMR-110 6.D.(1)(c) requires the identification, evaluation, and prioritization of mitigation actions that will build long-term resiliency to drought. In the revised plan, please clarify how the proposed mitigation actions were evaluated and prioritized. Throughout the discussion of the mitigation actions, there are some actions that were considered non-viable for implementation. In addition, there were some water users that prioritized their mitigation actions, and others that did not. In the revised plan, please incorporate a table, similar to Tables 14 and 15 that clarifies what actions were identified, and ultimately those that have viability, along with some sort of prioritization. Please clarify whether a prioritization of mitigation actions across water users was considered, or if the prioritization was only completed within a specific water user's actions. The prioritization, for example, can be based on status, timing, or funding, and could be prioritized by categories (e.g., structural, non-structural), as well as within categories.

Response: Section 9 was modified to include priorities and non-priorities of proposed Plan mitigation actions starting on page 120. This priority list was developed with members of the Planning Task Force. This list sorts the actions into three priorities while some actions were not prioritized at this time.

4. WTR TRMR-110 6.D.(1)(d) requires the identification, evaluation, and prioritization of response actions that can be implemented during a drought to mitigate the impacts. In the revised plan, please clarify how the five response actions were evaluated and prioritized. In

addition, please explain how these response actions relate to the stages of drought described in the Drought Monitoring section (see comment 1).

Response: Section 9 was modified to include priorities of proposed Plan response actions starting on page 123. This priority list was developed with members of the Planning Task Force.

Please submit an electronic copy of the revised drought contingency plan (with edits in red font) to Mr. Robert Stump of the Western Colorado Area Office. Upon receipt of the plan, Reclamation will perform another review to ensure these comments were adequately addressed, and we will notify you as to whether Reclamation has determined that the plan is complete and meets the requirements of the Drought Response Program.

If you have any questions or need clarification, please contact Mr. Stump at 970-565-0865. We look forward to assisting the Dolores Water Conservancy District and its partners in meeting their future water needs.

Submitted by Darion Mayhorn, Drought Response Program Coordinator, dmayhorn@usbr.gov.