

COMMENT LETTER

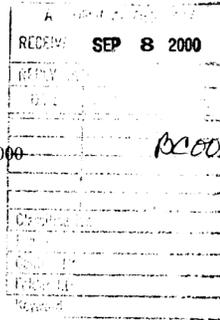
RESPONSES



SOUTHERN NEVADA WATER AUTHORITY

Ms. Jayne Harkins
Attn: BCOO-4600
Bureau of Reclamation
P.O. Box 61470
Boulder City, NV 89006-1470

September 6, 2000



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Southern Nevada Water System
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Boulder City, NV 89005
Telephone: (702) 564-7697
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Dear Ms. Harkins:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE COLORADO RIVER INTERIM SURPLUS CRITERIA

In July 2000, the Bureau of Reclamation (Reclamation) issued a Draft Environmental Impact Statement (DEIS) on the Colorado River Interim Surplus Criteria. The Southern Nevada Water Authority (Authority) would like to take this opportunity to provide comments. The Authority represents the major water and wastewater purveyors in southern Nevada, including the Las Vegas Valley Water District, the Cities of Boulder City, Henderson, Las Vegas, and North Las Vegas, the Clark County Sanitation District, and the Big Bend Water District in Laughlin. These agencies serve over 1.3 million people in the southern Nevada region. The Authority and its members control over 90% of the State of Nevada's 300,000 acre-foot consumptive right from the Colorado River.

The Authority supports Reclamation's proposal to establish interim surplus criteria on the Lower Colorado River. The criteria are intended to provide direction during an interim 15-year period for the annual determination by the Secretary of the Interior of normal, surplus, and shortage conditions in the Lower Colorado River Basin. They will facilitate efforts by the State of California to reduce its use of Colorado River water down to its 4.4-million acre-foot basic apportionment. They will also afford other Lower Division states, who have contracted for surplus water, a greater degree of predictability about its annual availability.

Specifically, the Authority supports the proposal submitted by the seven Colorado River basin States (Seven Basin States proposal) for the interim surplus guidelines. In the past year, the seven basin states have spent substantial time and effort and have made significant progress in their negotiations on interim surplus, which have culminated in a set of interim surplus guidelines agreed to by each state. These guidelines were presented to Reclamation by the seven states, and Reclamation issued them to the public in a Federal Register notice on August 8, 2000.

1: The preferred alternative in this FEIS is derived from the Draft Seven States Proposal. Reclamation did not structure the preferred alternative precisely as described in that draft proposal, but made some changes for consistency with the purpose and need of the proposed action, Reclamation policy and operational procedures.

1 cont'd below

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The modeling approach used to perform the impact analysis and review of alternatives in the DEIS is legitimate, impartial, and best simulates the Colorado River system. Potential environmental impacts are minimal and interim in nature, and the Colorado River system would revert to baseline conditions after the expiration of the 15 year interim period.

Based upon our analysis, the Seven Basin States proposal is within the range of alternatives and impacts analyzed in the DEIS. Reclamation's National Environmental Policy Act guidance allows new or modified alternatives that do not have any significant differences in environmental impacts to alternatives analyzed in the DEIS to be fully incorporated into the Final EIS. The Seven Basin States proposal does not change the results relative to potential impacts in the DEIS. The Authority supports designation of the Seven Basin States proposal as the Preferred Alternative in the Final EIS and as the final decision in the Record of Decision.

The Authority acknowledges the leadership shown by the Department of Interior in implementing this process of developing interim surplus guidelines, and appreciates the opportunity to be involved in the process. If you have any questions about these comments, please contact David Donnelly, Deputy General Manager, at (702) 258-3107.

Sincerely,


Patricia Mulroy
General Manager

PM:JM:LL:sh