

Pueblo West Metropolitan District  
 Department of Utilities  
 20 W. Palmer Lake Dr.  
 Pueblo West, CO 81007



Pueblo West Hereby submits the following comments on the draft Environmental Impact Statement for the Arkansas Valley Conduit and Long Term Excess Capacity Master Contract (DES 12-39) dated August, 2012:

1. Page A.1-73: Please revise the text regarding Pueblo West as shown in the following redline of the subject text:

**“Pueblo West**

All of Pueblo West’s **non-emergency** water sources originate as surface water stored at Pueblo Reservoir. Pueblo West can draw up to 18.94 cfs of water from the south outlet works. Pueblo West is also a participant in the Southern Delivery System, and in the future will be able to draw 27.85 cfs of water from the north outlet works. Pueblo West has no other available **non-emergency** potable water supplies other than those drawn from Pueblo Reservoir. Pueblo West’s projected water demand is discussed above. Pueblo West uses Pueblo Reservoir as a terminal storage facility. It has no terminal storage other than Pueblo Reservoir. Without the Interconnect, in the event of a shutdown of either the north or south outlet works at Pueblo Reservoir, Pueblo West would use the other outlet for emergency supplies. If both outlets were shutdown, or the Interconnect were to fail, Pueblo West could serve demands for several hours using existing treated water storage. If an outage were to last for one day or less during summer months (three days in winter), Pueblo West would activate their emergency plan of notifying large users such as schools and parks. If an outage at Pueblo Reservoir lasted for one week or more, Pueblo West would not be able to meet **full any water demands but would activate their emergency plan to pump from river or reservoir as a temporary emergency water supply**. If the Interconnect were in place, Pueblo West would begin using it after about one day of interrupted water service from Pueblo Reservoir. This would allow them to maintain water service to customers in the event of an operations disruption at Pueblo Reservoir of one day or more.”

2. Page 4-19 Results: This section of the report, among other things, discusses the impacts of the various alternatives on the flow of the Arkansas River from downstream of Pueblo Reservoir to Fountain Creek which encompasses the reach in which the Pueblo Flow Management Program has been implemented. Also encompassed in this reach is the exchange reach for Pueblo West’s decreed exchanges in Case No. 85CW134(Part A and Part B). Decreases of flow in this reach from the AVC alternatives which pipe water past this reach have the potential to decrease the amount of water available to Pueblo West as compared to existing conditions. Mitigation for any decrease in water available to Pueblo West from existing conditions should be included in the cost of the AVC portion of those alternatives which pipe flow past the subject reach.

3. Pueblo West could not find in the report where the amount of water estimated to be lost in transmission pipelines is addressed. Pueblo West suggests that this loss should be addressed in the report and in the project evaluations.

Thank you for the opportunity to provide comments on this report.