

RESPONSES TO COMMENTS

Appendix H

RESPONSES TO COMMENTS

The Draft Regulatory Storage Environmental Impact Statement on the Central Arizona Project was filed with the Environmental Protection Agency and released to the public on April 29, 1983. Approximately 600 copies of the draft statement were distributed for review.

Public hearings on the draft were held in Phoenix, Arizona on June 21, 1983, and in Mesa, Arizona on June 22, 1983. Approximately 155 people attended the three hearings. The official transcript of the proceedings is available for inspection in the Lower Colorado Regional Office of the Bureau of Reclamation, at the address given on the abstract page of the EIS, or at the Environmental Division, Bureau of Reclamation, Arizona Projects Office, Suite 2200 - Valley Center, 201 North Central Avenue, Phoenix, Arizona. The comments expressed at the public hearings are summarized below.

The public comment period on the draft statement ended on July 28, 1983. Seventy-five written comments were received during the period. Appendix H is divided into three sections:

- Public Hearing Summary
- General Comments
- Letters of Comment

PUBLIC HEARING SUMMARY

Three formal public hearings were held to receive comments on the Draft EIS. Notice of Availability on the Draft Environmental Impact Statement appeared in the May 4, 1983, Federal Register. In addition, over 4,000 copies of a Special Edition Newsletter summarizing the environmental impacts of the plans and announcing the public hearings were distributed to interested people.

The hearings were conducted by William Swan, Attorney/Advisor, Department of the Interior, Office of the Field Solicitor, Phoenix, Arizona. Officially representing the Bureau of Reclamation from the Arizona Projects Office to receive testimony were Dess Chappellear, Assistant Project Manager; Stephen Magnussen, Chief, Advance Planning Division; Bruce Ellis, Chief, Environmental Office; and Bruce Hutchinson, representing the Project Construction Engineer.

The first hearing was held June 21, 1983, at 1:00 p.m. in the Maricopa County Board of Supervisors' Auditorium, Phoenix, Arizona. Approximately 60 people signed the attendance register with 21 people presenting oral testimony. The following is a list of those testifying in the order in which they appeared:

<u>Name</u>	<u>Affiliation</u>
Joe Scott	Self
Frank Welsh	Citizens Concerned About the Project

Wesley Steiner	Arizona Department of Water Resources
David Yetman	Pima County Board of Supervisors and Pima County Flood Control District
Marvin Sheldon	Arizona Society of Professional Engineers
H.S. Raymond	Central Arizona Project Association
Roger Ernst	Self
Russell D. Hulse	Arizona Public Service Company
Honorable Margaret Hance	Mayor, City of Phoenix
Richard Rowe	Self
James Elmore	Rio Salado Development District
Jack Flint	Self
Richard M. Hurd	Self
Bob McCain	Arizona Municipal Water User's Association
Brian Evans	Self
Sandra Maunier	Self
Clem Titzek	Self
Henry Evans	State Representative
Carolina Butler	Committee to Save Fort McDowell
Bill Matthews	Valley Forward Association

The second hearing was held June 21, 1983, at 7:00 p.m. in Carl Hayden High School Auditorium, Phoenix, Arizona. Approximately 25 people signed the attendance registration with 12 people testifying. The following is a list of those in order of appearance.

<u>Name</u>	<u>Affiliation</u>
Mark Larson	Self
Patricia Mariella	Self
Dennis Mitchem	Self
Bob Lynch	Central Arizona Water Conservation District
Robert Norton	Self
Dr. Robert Witzeman	Self
David Weary	Self
John Pribila	Self
Frank Stagg	Self

The third hearing was held June 22, 1983, in Centennial Hall, Mesa Community Center, Mesa, Arizona. Approximately 70 people signed the attendance register with 27 people testifying. The following is a listing of those presenting testimony.

<u>Name</u>	<u>Affiliation</u>
Ramona Ortega Liston	John McCain, Congressman
Brian Reid	Sierra Club
Scott Burge	Maricopa Audubon Society
Milton Lee	Rio Salado Development District
Mary Casaboom	Self
Reid Teeples	Salt River Project
Carolyn Engle-Wilson	The Wildlife Society
Marilyn Stewart	Self

Bertram Oxman	Self
Lee Burge	Self
Herbert Fibel	Maricopa Audubon Society
Jim Seamans	Self
John Geib	City of Mesa
John Smith	Fort McDowell Indian Community
Richard Morrison	Self
Ron Schilling	Self
Brian Evans	Self
Calvin Pilcher	Fort McDowell Indian Community
Joan Johnson	Self
James Bailey	Self
Dr. Phillip DeNee	Self
Barbara Holaday	Self
Roger Swanson	Self
Carolina Butler	Self

Major comments received at the public hearings were:

1. Plan 6 should be implemented because of the benefits it provides.
2. The "no action" alternative should be the recommended plan.
3. Cliff Dam on the Verde River should not be implemented because of the environmental damage it causes and because it is not needed.
4. All alternative plans include Cliff Dam and Reservoir, an environmentally damaging dam and reservoir.
5. Rio Salado should be allocated 30,000 acre-feet of CAP water.

Responses to these comments are contained in the General Comment Section.

GENERAL COMMENTS AND RESPONSES

Many commentors had similar concerns. These are responded to in this section. The commentor is listed with the number of the letter in parentheses or an "H" for comments received at the public hearing.

GENERAL COMMENT #1

Implementation of Rio Salado will enhance the quality of life for Phoenix metropolitan area residents. Its implementation should be pursued.

Commentors:

C. Dennis Knight (4)
 Gordon L. Jones, University Golf Players, Inc. (5)
 Burton S. Burr, Arizona House of Representatives (6)
 J. Robert White (22)
 J.A. Chalmers, Ph.D., Mountain West (27)

David C. Lincoln (28)
John Standish (32)
Jim Sasser, Phoenix Board of Realtors, Inc. (39)
R.C. Houseworth (53)

James Elmore, Rio Salado Development District (H)
Ramona Ortega Liston, Representing Congressman John McCain (H)
Milton Lee, Rio Salado Development District (H)
Reid Teeple, Salt River Project (H)

Response:

The purpose of this EIS is to describe and to evaluate the proposed construction and operation of the Regulatory Storage Division of the CAP. Decisions on the implementation of the Rio Salado Plan are beyond the scope of this document. The expressions of support for the Rio Salado Plan are noted and are available for consideration by decisionmakers.

GENERAL COMMENT #2

Rio Salado should be allocated 30,000 af of CAP water.

Commentors:

Gordon L. Jones, University Golf Players, Inc (5)
Burton S. Burr, Arizona House of Representatives (6)
J. Robert White (22)
J.A. Chalmers, Ph.D., Mountain West (27)
David C. Lincoln (28)
Don Bennett, Betty Bennett (29)
Jim Haynes, Phoenix Metropolitan Chamber of Commerce (33)
Jim Sasser, Phoenix Board of Realtors, Inc. (39)

Mayor Margaret Hance, City of Phoenix (H)
James Elmore, Rio Salado Development District (H)
Bob McCain, Arizona Municipal Water Users Association (H)
Henry Evans, State Representative (H)
Bill Matthews, Valley Forward Association (H)
Dennis Mitchem, Rio Salado Development District (H)
Ramona Ortega Liston, representing Congressman John McCain (H)
Milton Lee, Rio Salado Development District (H)

Response:

The Secretary of Interior relied primarily on the recommendations of the Arizona Department of Water Resources (ADWR) to allocate CAP water to users other than Indians. If all the allocated CAP water is not contracted for, the Rio Salado Development District will have the opportunity to seek an allocation through the ADWR process. The impacts of CAP allocations are described and evaluated in the Central Arizona Project Final Environmental Statement (FES 72-35) and the Central Arizona Project Water Allocations and Water Service Contracting Final Environmental Statement (INT FES 82-7).

GENERAL COMMENT #3

Water should be provided to Rio Salado for mitigation of fish and wildlife resource losses.

Commentors:

Burton S. Barr, Arizona House of Representatives (6)
J. Robert White (22)
Mary Alice Bivins, Arizona Outdoor Recreation Coordinating
Commission (26)

James Elmore, Rio Salado Development District (H)
Milton Lee, Rio Salado Development District (H)

Response:

The preliminary Rio Salado Master Plan was reviewed by the HEP team to determine the feasibility of using the proposed development as mitigation for the impacts of Plan 6 on fish and wildlife habitat. The mitigation goal for the type of habitat lost at Cliff is defined as no net loss of in-kind habitat value; every habitat unit lost must be replaced by a unit of the same habitat type and quality.

The 17 evaluation species used to develop the mitigation plan for the Cliff site were considered in this review. These species included osprey, Bell's vireo, green heron, desert tortoise, desert cottontail, white-winged dove, Harris hawk, long-billed marsh wren, gray fox, cinnamon teal, Gambel's quail, Gila woodpecker, black-throated sparrow, verdin, javelina, channel catfish, and largemouth bass. Because of the anticipated human use of much of the naturally vegetated areas of Rio Salado, such species as the Bell's vireo, green heron, desert tortoise, long-billed marsh wren, gray fox and javelina would not find suitable habitat sufficiently lacking human disturbance. Lack of extensive areas of suitable habitat would also preclude the occurrence of the tortoise, fox, and javelina. The osprey and Harris hawk would possibly be seen but would be uncommon. This decrease in species diversity from the Cliff site to Rio Salado greatly affects the ability of Rio Salado to provide suitable mitigation.

The urban park as proposed by the Rio Salado Development District would provide little mitigation for the riparian communities that would be lost at the proposed Cliff site.

GENERAL COMMENT #4

I support the "No Action" Alternative.

Commentors:

Mary Alice Wright (7)
Jan K. Elliot (8)
Irma Hepner, Northern Arizona Audubon Society (10)
Donavon H. Lyngholm, Four Corners Wilderness Workshop (11)
Gayle G. Hartmann, Rincon Group, Grand Canyon Chapter, Sierra Club (18)

Judith A. Landrum (19)
Peter D. Tillman (21)
Cheryl S. Lazaroff (24)
Julia Fonseca (30)
Ruth I. Patterson (37)
Herb Fibel, Robert Witzeman, Maricopa Audubon Society (55)
Cary W. Meister, Yuma Audubon Society (63)
R.H. Johnson (72)

Jack Flint (H)
Carolina Butler (H)
Mark Larsen (H)
Nancy Meister (H)
David Weary (H)
Frank Stagg (H)
Brian Reid, Grand Canyon Chapter, Sierra Club (H)
Mary Casaboom (H)
Bertram Okman (H)
Ron Schilling (H)
Brian Evans (H)
Joan Johnson (H)
James Bailey (H)
Philip DeNee (H)
Barbara Holaday (H)
Eugene Knoder, National Audubon Society (H)

Response:

Your support for Plan 8, the "No Action" Alternative, has been noted and your letters of comment are available for decisionmakers.

GENERAL COMMENT #5

All alternative plans include Cliff Dam and Reservoir, an environmentally damaging dam and reservoir.

Commentors:

Mary Alice Wright (7)
Jan K. Elliot (8)
Irma Hepner, Northern Arizona Audubon Society (10)
Judith A. Landrum (19)
Ruth I. Patterson (37)
Eva Patten (43)
Gilbert T. Venable (46)
Cary W. Meister, Yuma Audubon Society (63)
Scott R. Burge, Herbert S. Fikel, Maricopa Audubon Society (69)

Marvin Sheldon, Arizona Society of Professional Engineers (H)
Jack Flint (H)
Carolina Butler (H)
Robert Norton (H)
Carolyn Engle-Wilson, The Wildlife Society, ASU Chapter (H)
Lee Burge (H)
Joan Johnson (H)

James Bailey (H)

Response:

In response to numerous comments on the Draft EIS, an alternative not including Cliff Dam and Reservoir, Plan 9, has been formulated. Plan 9 consists of New Waddell Dam and Reservoir and Modified Roosevelt Dam and Reservoir and Modified Stewart Mountain Dam and Reservoir as described for Plan 6 and modifications to Horseshoe and Bartlett Dams to solve the safety of dams concerns on the Verde River. Modification of the existing Horseshoe Dam would involve adding a gated spillway. Modification of the existing Bartlett Dam would involve raising the dam 27 feet and constructing an auxiliary spillway. The impacts of Plan 9 are discussed and compared with the other alternatives throughout the EIS.

GENERAL COMMENT #6

Cliff Dam on the Verde River should not be built because of the damage it causes to the environment.

Commentors:

Mary Alice Wright (7)
Jan K. Elliot (8)
Irma Hepner, Northern Arizona Audubon Society (10)
Donavon H. Lyngholm, Four Corners Wilderness Workshop (11)
Patricia Ackert (16)
Judith A. Landrum (19)
Peter D. Tillman (21)
Mary Schlenz (23)
Cheryl S. Lazaroff (24)
Virginia B. Brown (25)
Julia Fonseca (30)
Michael Barry, Laura Corbin (31)
Ruth I. Patterson (3)
Kathleen Rhodes (41)
Cary W. Meister, Yuma Audubon Society (63)
R.H. Johnson (72)

Richard Rowe (H)
Marvin Sheldon, Arizona Society of Professional Engineers (H)
Jack Flint (H)
Sandra Meunier (H)
Clem Titzek (H)
David Yetman (H)
Carolina Butler (H)
Robert Norton (H)
Robert Bradley (H)
Scott Burge (H)
Mary Casaboom (H)
Marilyn Stewart (H)
Bertram Oxman (H)
Lee Burge (H)
Herbert Fibel, Maricopa Audubon Society (H)
Jim Seamans (H)

Brian Evans (H)
Joan Johnson (H)
James Bailey (H)
Barbara Holaday (H)
Eugene Knoder, National Audubon Society (H)
William Ahern (H)

Response:

The environmental effect of Cliff Dam has been described in the Final EIS. We believe that adverse impacts have been appropriately mitigated. These measures are described in Section IV.C. Your expressions of opposition to Cliff Dam is noted and is available for consideration by decisionmakers.

GENERAL COMMENT #7

Plan 6 should be implemented because of the benefits it provides.

Commentors:

David A. Bixler, Home Builders Association of Central Arizona (12)
Don W. Strauch, Mayor, City of Mesa (13)
Ben Avery (14)
Fred J. Nobbe, Arizona Water Resources Committee (15)
Mary Alice Bivins, Arizona Outdoor Recreation Coordinating
Commission (26)
J.A. Chalmers, Ph.D., Mountain West (27)
Jim Haynes, Phoenix, Metropolitan Chamber of Commerce (33)
George Campbell, Maricopa County Board of Supervisors (34)
Maricopa County Citizens Flood Control Advisory Board (36)
Ed Pastor, Maricopa County Board of Supervisors (38)
John R. Norton, III (40)
Jeff Schubert, Vice Mayor, City of Scottsdale (42)
Frank M. Barrios, Arizona Department of Water Resources (45)
Robert Yount, Arizona State Land Department (45)
D.E. Sagramoso, Flood Control District of Maricopa Co. (50)
Board of Directors, Flood Control District of Maricopa Co. (58)
Board of Supervisors, Maricopa Co. (59)
Tom Clark, Central Arizona Water Conservation District (68)

Joseph F. Scott (H)
Wesley Steiner, Arizona Department of Water Resources, State of
Arizona (H)
H.S. Raymond, Central Arizona Project Association (H)
Mayor Margaret Hance, City of Phoenix (H)
James Elmore, Rio Salado Development District (H)
Bob McCain, Arizona Municipal Water Users Association (H)
Lawrence Center (H)
Henry Evans, State Representative (H)
Bill Matthews, Valley Forward Association (H)
Dennis Mitchem, Rio Salado Development District (H)
Bob Lynch, Central Arizona Water Conservation District (H)
John Pribula (H)
Reid Teeples, Salt River Project (H)

John Geib, City of Mesa (H)
John Smith, Fort McDowell Indian Community (H)
Richard Morrison (H)
Calvin Pilcher, Fort McDowell Indian Community (H)
Roger Swanson, Tempe Rio Salado Advisory Commission (H)

Response:

Your support for Plan 6, the proposed action, has been noted and your letters have been made available for consideration by decisionmakers.

GENERAL COMMENT #8

Reducing flood flows to 55,000 cfs through Phoenix does more than provide flood control. It is a subsidy to flood plain land developers. There is adequate developable land available in Phoenix.

Commentors:

Peter D. Tillman (21)
Mary Schlenz (23)
Cheryl S. Lazaroff (24)
Kathleen Rhodes (41)
Herb Fibel, Robert Witzeman, Maricopa Audubon Society (55)

Response:

Flood control measures usually provide benefits of several types. While the primary thrust is to prevent damages caused by inundation, the benefit of increased land values is inherently provided and as is the case of all types of flood control benefits, it usually is a windfall benefit for affected land owners. This benefit of increased land value is listed in Table IV-37 as "Location and Intensification", in the category of Flood Control Benefits. The amount of benefit in this category that is directly attributable to Cliff Dam is the difference in this figure between Plan 6 and Plan 9 (or \$13,211,000 expressed as an average annual figure, in January 1982 dollars). The nature and amount of this benefit has been considered in arriving at the decision to recommend Plan 6 as the proposed action.

The availability of other developable land, outside the flood plain, is taken into account when the estimates of the increase of land values are made.

Environmental impact statements do not go into economic impacts in depth. For more complete discussions, the CAWCS Stage III Report and its supporting documents should be referred to.

While there is normally no mechanism to compensate the general taxpayer for the land value benefits he provides to private land owners, the efforts of the Rio Salado Development District to establish "tax increment financing" are of interest. The effect of "tax increment financing" would be to levy additional taxes on property whose value is increased by virtue of a public flood control project.

GENERAL COMMENT #9

Water Resources Associates (WRS), Inc's. Probable Maximum Flood - Salt and Verde Rivers Basins shows a much smaller probable maximum flood (PMF) than was used to formulate alternative plans. The smaller PMF and changes to plan formulation caused by a reduced PMF should be evaluated.

Commentors:

Robert Witzeman, Herbert Fibel, Maricopa Audubon Society (55)
Tom Clark, Central Arizona Water Conservation District (68)
Scott Burge, Herbert Fibel, Maricopa Audubon Society (69)
Keith Turley, Arizona Public Service Company (70)

Response:

Hydrometeorologists and hydrologists of Reclamation's Flood Section in the Engineering and Research Center have reviewed the WRA report. They found that WRA presented no new data or methodology. The WRA flood volume has an indicated probability of about 1 in 125 during any given year. Considering that Probable Maximum Floods (PMF) strive for zero probability of occurrence, it is Reclamation's view that the WRA figures fall far short of PMF levels.

Since the plans were formulated at the feasibility level, we consider that probable maximum storms and resulting floods presently approved for use in this study are entirely adequate. While the studies are adequate for their intended use, a complete reanalysis of both the meteorologic and hydrologic aspects of the PMF development for the two basins will be completed prior to initiating preparation of plans and specifications for construction purposes.

We consider that the PMF estimates that have been developed and used to date by Reclamation are based on sound procedures and are valid for our current level of study. Furthermore, we point out they will be refined and finalized for specification designs and will represent very intense, detailed work in both the meteorologic and hydrologic areas.

In order to evaluate the implication of the WRA report on plan formulation, we routed the WRA inflow hydrographs for the Salt and Verde Rivers through the existing system of dams. Our studies indicate that even for these reduced hydrographs, every one of the six existing dams would overtop and it appears this would still result in partial or complete failure. Roosevelt Dam, for example, with a spillway capacity of roughly one-third the peak flow suggested by WRA, would be overtopped by 8 feet of water. (The Bureau IDF, by comparison, would overtop Roosevelt Dam by 15 feet.) A reduced spillway design flood such as that suggested by WRA would still require extensive modifications to the existing system of dams in order to correct the unsafe conditions.

Using the WRA hydrographs could result in a reduction in the overall cost of Plan 6. Appraisal estimates of those features were made using the reduced inflow hydrographs. This analysis indicated that the overall cost of Plan 6, approximately \$1.1 billion, would be reduced by approximately 10 percent.

Appraisal estimates for Plan 3 were made using inflow hydrograph. This estimate indicated that while Plan 3 would also be reduced by as much as 10 percent, it was still, depending on the operation scheme assumed, 10 to 20 percent more expensive than Plan 6.

Given this and the fact that the relative economic, social, and environmental ranking of the plans would not change, the selection of Plan 6 is not sensitive to a reduction to the inflow hydrographs of the magnitude presented in the WRA report.

Review of the WRA report yielded the following conclusions:

1. The design flood we are currently using is valid and appropriate for the present feasibility design.
2. We will follow our present plan to revise the spillway design flood during the course of our final design with the assistance of the Corps.
3. A less severe design flood, such as that suggested by WRA would not substantially reduce our assessment of the severity of the unsafe conditions of the existing dams on the Salt and Verde Rivers.
4. The required modifications to the existing system of dams give us an opportunity to include flood control measures in these structures more economically than by any other means.
5. Plan 6 still appears to be the most appropriate plan for identification as our agency's proposed action.

INDEX OF LETTERS COMMENTING ON ENVIRONMENTAL IMPACT STATEMENT

REGULATORY STORAGE DIVISION

COMMENT AND RESPONSE NO.	ENTITY OR INDIVIDUAL SUBMITTING COMMENT
1	Maricopa County Department of Planning and Development, Phoenix, AZ, Dudley Onderdonk, Principal Planner
2	Department of Agriculture, Soil Conservation Service, Phoenix, AZ, Verne M. Bathurst, State Conservationist
3	Fish and Wildlife Service, Ecological Services, Phoenix, AZ, Gilbert D. Metz, Field Supervisor
4	C. Dennis Knight, Phoenix, AZ
5	University Golf Players Inc., Tempe, AZ, Gordon L. Jones
6	Arizona House of Representatives, Phoenix, AZ, Burton S. Barr, Majority Leader
7	Mary Alice Wright, Scottsdale, AZ
8	Jan Elliott, Clifton, AZ
9	John H. Shannon, P.E., Phoenix, AZ
10	Northern Arizona Audubon Society, Sedona, AZ, Irma Hepner
11	Four Corners Wilderness Workshop, Flagstaff, AZ, Donavon H. Lyngholm, Secretary
12	Home Builders Association of Central Arizona, Phoenix, AZ David A. Bixler, Deputy Director
13	Office of the Mayor, City of Mesa Arizona, Mesa, AZ, Don Strauch, Mayor
14	Ben Avery, Phoenix, AZ
15	Arizona Water Resources Committee, Phoenix, AZ, Fred J. Nobbe, President
16	Patricia Ackert, Tucson, AZ
17	Bureau of Land Management, Phoenix, AZ, Glendon E. Collins, Acting State Director
18	Sierra Club, Grand Canyon Chapter - Arizona, Gayle G. Hartmann, Chairman

COMMENT AND
RESPONSE NO.

ENTITY OR INDIVIDUAL SUBMITTING COMMENT

- 19 Judith A. Landrum, Flagstaff, AZ
- 20 Arizona State Parks, Phoenix, AZ, Michael A. Ramnes,
State Parks Director
- 21 Peter D. Tillman, Tucson, AZ
- 22 Valley National Bank of Arizona, Phoenix, AZ, J. Robert White,
Vice President
- 23 Mary Schlentz, Tucson, AZ
- 24 Cheryl S. Lazaroff, Tucson, AZ
- 25 Virginia B. Brown, Tucson, AZ
- 26 Arizona Outdoor Recreation Coordinating Commission, Phoenix, AZ,
Mary Alice Bivens, Director/Liaison Officer
- 27 Mountain West Research-Southwest, Inc., Tempe, AZ,
J. A. Chalmers, Ph.D., Principal
- 28 David C. Lincoln, Phoenix, AZ
- 29 Don Bennett and Betty Bennett, Tempe, AZ
- 30 Julia Fonseca, Department of Geosciences, University of
Tucson, Tucson, AZ
- 31 Michael Barry and Laura Corbin, Tucson, AZ
- 32 John Standish, Tempe, AZ
- 33 Phoenix Metropolitan Chamber of Commerce, Phoenix, AZ,
Jim Haynes, President
- 34 Maricopa County Board of Supervisors, Phoenix, AZ, George
Campbell, Supervisor, District 2
- 35 Bureau of Indian Affairs, Phoenix, AZ, W. P. Ragsdale,
Assistant Phoenix Area Director
- 36 Flood Control District of Maricopa County, Phoenix, AZ,
D. E. Sagramoso, P.E., Chief Engineer and General Manager
- 37 Ruth I. Patterson, Phoenix, AZ
- 38 Maricopa County Board of Supervisors, Phoenix, AZ,
Ed Pastor, Supervisor, District 5

COMMENT AND
RESPONSE NO.

ENTITY OR INDIVIDUAL SUBMITTING COMMENT

- 39 Phoenix Board of Realtors, Inc., Phoenix, AZ, Jim Sasser,
President
- 40 John R. Norton III, Phoenix, AZ
- 41 Kathleen Rhodes, Phoenix, AZ
- 42 Office of the Mayor and City Council, Scottsdale, AZ,
Jeff Schubert, Vice Mayor
- 43 Eva Patten, Tempe, AZ
- 44 Arizona Game and Fish Department, Phoenix, AZ,
Roger J. Gruenewald, Deputy Director
- 45 Arizona Clearinghouse
- 46 Gilbert T. Venable, Attorney at Law, Phoenix, AZ
- 47 Tucson Audubon Society, Tucson, AZ, Gertrude A. Hochgraf,
Conservation Chairperson
- 48 New Mexico Interstate Stream Commission, Santa Fe, NM,
S. E. Reynolds, Secretary
- 49 Agri-Business Council of Arizona Inc., Phoenix, AZ,
Robert E. Moore, Executive Vice President
- 50 Flood Control District of Maricopa County, Phoenix, AZ,
D. E. Sagramoso, P.E., Chief Engineer and General Manager
- 51 The Wildlife Society, Arizona Chapter, Phoenix, AZ,
Richard Ockenfels, President Elect
- 52 Maricopa Water District, Peoria, AZ, H. S. Raymond, President
- 53 The Arizona Bank, Phoenix, AZ, Richard C. Houseworth,
Executive Vice President
- 54 National Park Service, Western Region, San Francisco, CA,
W. Powell White, Acting Regional Director, Western Region
- 55 Maricopa Audubon Society, Phoenix, AZ, Robert A. Witzeman, M.D.,
Past President and Herb Fibel, President
- 56 David E. Creighton, Jr., P.E., Scottsdale, AZ
- 57 Department of Energy, Western Area Power Administration,
Boulder City, NV, John S. Forman, Deputy Area Manager
- 58 Flood Control District of Maricopa County, Phoenix, AZ,
Stanley L. Smith, Jr., P.E., Deputy Chief Engineer

COMMENT AND
RESPONSE NO.

ENTITY OR INDIVIDUAL SUBMITTING COMMENT

- 59 Flood Control District of Maricopa County, Phoenix, AZ,
Stanley L. Smith, Jr., P.E., Deputy Chief Engineer
- 60 Department of Defense, Department of the Army, San Francisco,
CA, James D. Sears, for Phillip Frank Dunn, Chief, Planning
Division
- 61 Department of Health and Human Services, Atlanta, GA,
Frank S. Lisella, Ph.D., Chief, Environmental Affairs
Group
- 62 Patricia S. Mariella, Phoenix, AZ
- 63 Yuma Audubon Society, Yuma, AZ, Cary W. Meister, President
- 64 Drew Cook, Phoenix, AZ
- 65 United States Environmental Protection Agency, San Francisco,
CA, Charles W. Murray, Jr., Assistant Regional Administrator
for Policy, Technical, and Resources Management
- 66 Bureau of Mines, Washington, D.C.,
- 67 Salt River Project, Phoenix, AZ, R. W. Mason, for Reid Teeple,
Associate General Manager, Water
- 68 Central Arizona Water Conservation District, Phoenix, AZ,
Thomas C. Clark, General Manager
- 69 Maricopa Audubon Society, Tempe, AZ, Scott R. Burge,
Conservation Chairman and Herbert S. Fibel, President
- 70 Arizona Public Service Company, Phoenix, AZ, Keith Turley,
Chairman and Chief Executive Officer
- 71 U.S. Department of Transportation, United States Coast Guard,
Washington, D.C., W. R. Riedel, Chief, Planning, Coordination
and Analysis Staff, By direction of the Commandant
- 72 R. H. Johnson, Scottsdale, AZ
- 73 Arizona B.A.S.S. State Federation, Phoenix, AZ, David Nunley,
President
- 74 Arizona B.A.S.S. State Federation, Phoenix, AZ, Russ Denz,
President, Desert Bassmasters and Charles Goslin, President,
Westside Bassmaster of Phoenix

MARICOPA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT

111 S. 3rd. Avenue, Room 300, Phoenix, Arizona 85003 - Phone (602) 262-3201



May 23, 1983

Regional Environmental Offices
Lower Colorado Region
U. S. Bureau of Reclamation
Box 427
Boulder City, Nevada 89005

OFFICIAL	
RECEIVED	MAY 26 1983
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Action: <u>MW</u>	
Action Taken	
Date	Inc'd
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Dear Regional Environmental Offices:

Thank you for sending us the Draft Environmental Impact Statement for the Regulatory Storage division of the Central Arizona Project. This indepth document does a good job of assessing the trade-offs required for a project the size of the Central Arizona Project.

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We in the Department of Planning and Development can add a few items that will enhance the statement. First, in Figure I-1 CAWCS Study Area, you show the unincorporated community of Allenville. Allenville (now Hopeville) has been moved north of the City of Buckey adjacent to I-10. Second, any discussion of water, pages 59-62, quality without a reference to water quality standards should be re-examined. As a disclosure document, a reference point is needed for the layman to understand the present state of events. Third, there is no direct reference to the Rio Salado project. Rio Salado is a special governmental district which will benefit greatly from the improvements outlined in the EIS. Page 109 Social Resources, might be a good place to discuss Rio Salado. Only recently have the costs and benefits of the Rio Salado Alternatives been quantified and this work should be included in the final EIS.

1
2

These suggestions in no way serve to void or detract from the massive amount of work already undertaken. In fact, without a strong base, it would be impossible to comment.

Thank you for the opportunity to respond.

Sincerely,

DON E. McDANIEL, JR., DIRECTOR
DEPARTMENT OF PLANNING AND DEVELOPMENT

Dudley Onderdonk
Principal Planner
Advance Planning Division

DO/na

Responses to Comments
Maricopa County Department of Planning and Development

- 1-1 Figure I-1 has been corrected to show the correct location of Hopeville.
- 1-2 A discussion of water quality standards is contained in Section IV.B.2. Reference to this has been added to Section III.B.1.b.
- 1-3 Although full implementation of the Rio Salado Development District is dependent on providing upstream flood control, many other issues also must be resolved including financing and land acquisition. The impact of the alternative plans on the potential for Rio Salado has been added to Section IV.B.7.e.



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UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

Ecological Services
2934 W. Fairmount Avenue
Phoenix, Arizona 85017

June 22, 1983

#3

OFFICIAL FILE COPY		
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A.	7#3	
Admitt	-1B	
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Date	Incl.	To
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MEMORANDUM

To: Regional Director, U. S. Bureau of Reclamation, Lower Colorado Region, Boulder City, Nevada

From: Field Supervisor, U. S. Fish and Wildlife Service, Ecological Services, Phoenix, Arizona

Subject: Central Arizona Project, Regulatory Storage Division -- Draft Environmental Impact Statement EC 83/15

We have reviewed the subject document and find that it contains several major inadequacies. Of particular concern is the lack of data in several critical discussions for all action alternatives: description of project construction and operation, impacts to fish and wildlife resources caused by project construction and operation, the proposed measures to mitigate those impacts, and environmental consequences of developing the proposed recreation plan.

The majority of the statement's failings are directly attributable to the lack of information describing project construction and operation. The generalized discussions of construction activities such as the development and use of haul roads, borrow areas, spoil areas, and staging sites do not allow for the necessary assessment of impacts caused by such activities. The delineations of the areas encompass only the general locations, not specific sites. Because of the generalized discussion of project operation, impacts on reservoir fisheries, terrestrial habitat to be inundated, and endangered species caused by reservoir operation schemes cannot be adequately assessed for any of the alternative actions. Similarly, the delineation of impacts of water releases on downstream flows in reference to riparian habitat, aquatic resources and endangered species is severely limited because of lack of information presented in the draft statement.

The mitigation measures proposed by the Bureau are unclear. Several alternative routes to achieve mitigation are discussed in general terms but presentations of specific measures, like specific impacts, are lacking.

Increases in recreation use of project facilities are anticipated to be several times the levels now occurring within the study area. However, the statement provides no assessment of the impacts of such increased usage levels on fish and wildlife resources, including endangered species.

4 As Mr. Timothy Henley of the Bureau's Arizona Projects Office stated during the June 9, 1983 meeting of the Technical Agency Group formed for the Central Arizona Water Control Study, the detailed descriptions and anticipated impacts of project construction and operation will not be known until the project planning reports are available. Since the Final Environmental Impact Statement is due to be filed in December 1983, but the needed planning reports will not be prepared before 1984, essential data for use in impact assessment of the preferred plan should be presented in a supplemental impact statement following definite plan selection. If such a statement is not to be prepared by the Bureau, we recommend that the current draft be substantially revised to present discussion wherein Plan 6 is separated from the remaining alternatives and the necessary data concerning project construction and operation are provided specifically for the selected alternative in addition to the remaining plans.

Our specific comments on the draft environmental assessment are presented below:

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
5 Summary, 7	Plan 6	<p>The statement of insignificant impacts to endangered species should be omitted as an advantage of Plan 6. As it stands, this entry is misleading and presents an inaccurate assessment of the plan.</p> <p>The jeopardy opinion issued under the Endangered Species Act should be listed under the disadvantages of Plan 6.</p>
6 Summary, 8	3	<p>The discussion should state that a jeopardy opinion has been issued by the U. S. Fish and Wildlife Service for Plan 6.</p>
7 Summary, 18	Table 4, Plan 6	<p>We strongly disagree with the presentation of 0 number of bald eagle breeding areas disrupted as a result of loss of stream habitat. Construction activities and recreational use may very well render areas of stream habitat unuseable by the eagles.</p>

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
Summary, 18 (Continued)		"Mitigation" in the form of reasonable and prudent alternatives have been provided to the Bureau in the March 8, 1983 Biological Opinion under Section 7 of the Endangered Species Act. The term "Insignificant" is incorrect and misleading. Plan 6 was issued a jeopardy opinion by the Fish and Wildlife Service.
	Table 4, Plan 6	The figure +1 is inaccurate in describing Plan 6. Those river miles recovered from the bed of Horseshoe Reservoir cannot in any way be viewed as equal replacement for those river miles inundated by the proposed Cliff Reservoir. 8
		We question the statement of no change in flow characteristics of Salt and Verde Rivers when operation regimes have not yet been delineated for any of the alternatives. 9
		We strongly disagree with the classification of these impacts as insignificant without mitigation. 10
		The "minimum" pool at New Waddell is inactive storage that would decrease over the project life. This is not considered a guaranteed minimum pool for fisheries benefits. 11
Summary, 18	Table 4	The categories of Terrestrial Habitat and Management - Special Use Areas have been omitted from this table and should be included. 12
Summary, 22	Table 4	The number of miles for stream-oriented recreation are misleading. The miles of river recovered from the bed of Horseshoe Reservoir would not support recreation unless substantial mitigation measures are implemented. 13

	<u>Page No.</u>	<u>Paragraph</u>	<u>Comments</u>
	Summary, 24	Table 4	Why is the mitigation presented for biological resources limited to "conceptual" when mitigation for impacted sociological resources has no such modification?
14	3	2	The phrase "initiatives for impact mitigation" is ambiguous. Does the Bureau have a mitigation plan? Which of the conceptual mitigation measures form the plan to be implemented?
15	14	2	The lands within the IDF elevation could also be used for mitigation activities.
16		2	We have repeatedly recommended throughout the CAWCS that consideration be given to only selective clearing of the conservation pool. Retention of the vegetation would provide fish habitat after reservoir filling.
17	16	1	The term minimum pool should be defined in this discussion.
18	23	last	By what amount would flow in the Verde River be reduced from November through mid-March?
19	24	1st incomplete paragraph	Will the flow stoppages currently occurring on the Verde River be perpetuated?
20	41	Table II-8	The elevation for the inactive (minimum) pool should be presented in this table.

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>	
46	Table II-10	See comments on Summary Table 2.	21
54	1	The last sentence should be amended to read: At Horseshoe Reservoir the success of sportfish production is somewhat compromised by fluctuating water levels.	22
74	5	This discussion should be expanded to include the recreation use made of non-developed sites along the Verde River both upstream and downstream of Horseshoe Reservoir.	23
116	3	A minimum pool for fisheries should be included within this discussion of pool areas and uses.	24
121	2	There is a discrepancy between this statement concerning altering flows on the rivers and the assertion in Table 4 that no change in flow characteristics would be caused by any project action.	25
121	3	See above comment.	
121 122	4 & 5 1-4	The discussion of mitigation should include the proposed timing of implementation and level of recovery desired by the Bureau.	26
137		This discussion should be expanded to include the findings presented in the March 8, 1983 Biological Opinion issued on Plan 6.	27
139	2	"Mitigation" for the bald eagle should list those reasonable and prudent alternatives to Plan 6 that were provided in the Biological Opinion. The mitigation discussed in this section has no relevance to the findings contained in the opinion or to the constraints set upon the proposed project by this agency in the opinion.	28

	<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
29	140	1	The impacts to the Roosevelt Lake Wildlife Area should be included in this discussion.
30	142		This section should include a discussion of the impacts of recreation development and use on fish and wildlife resources, including endangered species.
31	146	Table IV-17	See comments for Table 4.
32	163		The discussion concerning recreation development and use should be expanded to include the increases in use levels and the effects of development and use on fish and wildlife resources. Such impacts should be included in this section or detailed under impacts to biological resources and referenced in this section.
33	197	5 & 6	Where would these displaced residents be relocated? In order to mitigate for wildlife habitat impacted by the relocations, this discussion should provide more detailed information concerning the amount and location of lands needed for these relocations.
34	235 247	8 1	The last sentences on page 235 and first sentences on page 247 exemplify the inadequate presentation of information in the statement: without specific data on the project and its impacts, no specific mitigation measures can be defined.
35	236	Table IV-41	See comments on Table 4.
	237	Table IV-41	See comments on Table 4.

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
247	1st complete	The statements contained in this paragraph greatly differ from those presented by Mr. Henley on June 9, 1983. Mr. Henley said that detailed delineation of project impacts would not be known until the planning reports. These reports are not scheduled for completion until after the Final EIS is filed. Therefore, we question the applicability of a mitigation plan that is prepared before the specific impacts are quantified. 36
251 252	2-8 1-3	This section should include those reasonable and prudent alternatives specified for Plan 6 in the Biological Opinion issued to the Bureau. 37
264	1-4	This discussion should include the cumulative impacts of introducing Colorado River waters and biota into central Arizona. 38
272	Table IV-49	<p>The long-term impacts associated with introducing Colorado fish species into Lake Pleasant and possibly replacing or in other ways impacting existing fish populations should be included in this table.</p> <p>The impacts listed in the table are unmitigated impacts; as such, the long-term impacts on threatened and endangered species should include the finding of the March 8, 1983 Biological Opinion: the proposed project is likely to jeopardize the continued existence of the southwest bald eagle population. 39</p> <p>The encroachment of recreation development and use at Cliff and Roosevelt Reservoirs on wildlife habitat and use patterns should be discussed as a long-term impact.</p>

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
40 272	Table IV-49 (Continued)	The inactive storage at New Waddell should not be classified as a guaranteed minimum pool for fisheries, as inactive storage, its use as guaranteed fish habitat during stressful drawdown periods is debatable.
41 281	Table IV-50	The statement of "Full Compliance" under the Endangered Species Act is false. Compliance will not be completed until those reasonable and prudent alternatives outlined in the March 8, 1983 Biological Opinion for Plan 6 are implemented. Then and only then can the proposed action be considered in full compliance with the law.
42 B-7	2	The discussion of the HEP and Fish and Wildlife Coordination Act Report should state that, in accordance with the Memorandum of Agreement between this agency and the Bureau of Reclamation, the HEP report and FWCA report deal only with Plan 6.
B-8	1	This discussion should indicate that formal consultation under the Endangered Species Act was conducted only for Plan 6.
43 B-10	4	The discussion of additional funding for construction and operation of proposed project features should clearly delineate that monies required for mitigation of the project would be included as project costs whatever funding source is to be used.
44 D-11	3	The effects of high flows in providing seed beds for new growth of such riparian species as cottonwoods and willows should be discussed in this section.

<u>Page No.</u>	<u>Paragraph</u>	<u>Comment</u>
E-5	2	The second sentence of this paragraph should be amended to read: "This opinion states that, subject to the implementation of reasonable and prudent alternatives, Plan 6 is likely to jeopardize the continued existence of the southwest bald eagle population." The last sentence of this paragraph is misleading and should be omitted.

45

In summary, the draft Environmental Impact Statement does not adequately address construction or operation of any of the action alternatives. Impacts of construction and operation of the alternatives and of the proposed recreation plan on fish and wildlife resources are also insufficiently presented, as are any mitigation proposals for those impacts.

We earnestly recommend that this statement be revised to correct these deficiencies or supplemented by an additional impact statement in which the necessary information is provided.



cc: FWS/EC, Washington, DC
Assistant Regional Director, (AHR), (SE), Fish and Wildlife Service,
Region 2, Albuquerque, New Mexico
Director, Arizona Game and Fish Department, Phoenix, Arizona
Forest Supervisor, Tonto National Forest, Phoenix, Arizona
Mr. Jay Brandon, Arizona Wildlife Federation, Phoenix, Arizona
Maricopa Audubon Society, Phoenix, Arizona

Responses to Comments
Fish and Wildlife Service

- 3-1 All Essential data for use in impact assessment is available in this statement. Updated construction and operation data on the proposed action was incorporated into the mitigation plan which is described in Section IV.C. If essential data changes with regards to the proposed action, the need for further environmental compliance will be evaluated.
- 3-2 Section IV.3 has been revised to include commitments to a definitive mitigation plan.
- 3-3 Impacts of increased recreational use are dependent on the management policies associated with the recreation plans. Management policies will be implemented in accordance with the reasonable and prudent alternatives in the Biological Opinion received as a result of the consultation under Section 7 of the Endangered Species Act. In addition, the mitigation plan includes specific measures to reduce the impacts of increased recreational use.
- 3-4 Although publication of the Stage III Report will follow the filing of the EIS, the data were available for inclusion in the document and for development of the mitigation plan.
- 3-5 Table 2 has been changed to reflect the issuance of the jeopardy opinion for Plan 6 and the required actions for avoiding impacts to the bald eagle.
- 3-6 The text has been changed to read "Environmental impacts of Plan 6 include losses of riparian habitat and cultural resources and adverse effects to the bald eagle; these same impacts would also occur in Plans 1 and 7."
- 3-7 Table 4 has been changed to reflect the impacts to the bald eagle and the fact that mitigation would consist of implementing the alternatives required by the jeopardy opinion.
- 3-8 This table has been changed to reflect the mitigation required to rehabilitate the 7 miles of river which passes through the Horseshoe Lakebed.
- 3-9 Detailed operation studies were done for the proposed action for use in development of the mitigation plan.
- 3-10 The mitigation plan, Section IV.C.1, details the rehabilitation that will take place on the Verde River in the Horseshoe Lakebed.
- 3-11 The minimum pool described here is a dedicated pool of 5,000 acre-feet which would be maintained for the survival of enough fish to repopulate the reservoir given low water conditions. This minimum pool is considered an enhancement over present conditions as there is no guaranteed minimum pool at Lake Pleasant now.

- 3-12 The categories of Terrestrial Habitat and Management Special Use Areas have been included in the tables.
- 3-13 See response to comments 6 and 8.
- 3-14 Section IV.3 now details Reclamation's mitigation plan and describes the mitigation measures that will be implemented.
- 3-15 The area encompassed by the maximum high water elevation for the Maximum Probable Flood event has been designated in the mitigation plan as the area to be managed for wildlife purposes.
- 3-16 Reclamation recognizes the value of selective clearing for fish and wildlife and has developed a selective clearing plan as part of the mitigation plan.
- 3-17 The minimum pool is a dedicated amount of water that will be maintained during low water periods to prevent a total die off of reservoir fishes and to allow for the repopulation of the reservoir when water levels rise. This definition has been added to the text.
- 3-18 Because there are no significant changes to the existing operation, the flow and flow regime would remain essentially the same.
- 3-19 Flow stoppages on the Verde River would be eliminated by the provision of a minimum flow of 50 cfs.
- 3-20 This table has been revised to include the minimum pool elevation.
- 3-21 Revisions have been made to reflect your comments.
- 3-22 Suggested revision has been made.
- 3-23 Recreational use figures given include use at both developed and non-developed sites.
- 3-24 The discussion on pool areas and uses is meant to describe in general terms the typical reservoir situation. Adding minimum pool to this discussion would have no significant clarifying purpose.
- 3-25 The "no change" in Table 4 refers to maintenance of a perennial stream; 50 cfs flows would maintain the perennial stream.
- 3-26 Commitments to the mitigation plan are discussed in Chapter IV.3.
- 3-27 The text has been amended to reflect the Endangered Species Act, Section 7 opinion dated March 8, 1983 for Plan 6.
- 3-28 The conceptual mitigation presented was included to provide for comparison of alternative plans. Detailed mitigation in accordance with Section 7 consultation is presented in Section IV.3 of the EIS.
- 3-29 The text has been changed to include the waterfowl management area.

- 3-30 Recreational use has been added to this section.
- 3-31 This table has been changed to reflect changes in Table 4.
- 3-32 Impacts caused by an increase in recreation use of the Plan 6 facilities have been included in the impact discussions for Endangered Species and Special Use Areas. Mitigation of these impacts is discussed in Chapter IV.
- 3-33 The exact amount of land required for development of lots adjacent to Roosevelt Lake Estates has not been determined. As plans become more definitive, a mitigation plan for fish and wildlife resources will be developed.
- 3-34 The mitigation plan is discussed in Section IV.C.1.
- 3-35 The table has been revised.
- 3-36 See response to comment 4.
- 3-37 Section IV.C.1 has been revised to discuss the mitigation plan including the reasonable and prudent alternatives specified for Plan 6 in the Biological Opinion.
- 3-38 The text has been changed to include the introduction of striped bass and tilapia and the idea that these species may have an adverse impact on the existing fishery.
- 3-39 The table has been revised to reflect these concerns.
- 3-40 The guaranteed minimum pool at New Waddell is meant to provide a carry-over breeding population during periods of low water only and not to carry over the entire fish population. The minimum pool constitutes enhancement over present conditions.
- 3-41 The table has been changed to indicate the status of compliance.
- 3-42 The text has been modified to clarify that the FWCA report and Endangered Species Act consultation pertain only to Plan 6.
- 3-43 Fish and wildlife mitigation monies are considered requisite project funding. The discussion concerns general funding considerations.
- 3-44 The discussion concerns large flows that have scoured the river channel clear of all vegetation. The small flows which tend to disseminate cottonwood seeds are not expected to be affected.
- 3-45 These changes have been incorporated in E-5 of the Appendices.

4
C. DENNIS KNIGHT
777 East Thomas Road
Suite 200
Phoenix, Arizona 85014
(602) 277-1733

RECEIVED
JUN 21 1983
706
6/21 7:00 SW #4 7:10

June 17, 1983

Project Manager
Bureau of Reclamation
Arizona Projects Office
Suite 2200 -- Valley Center
Phoenix, Arizona 85073

RE: ENVIRONMENT HEARINGS FOR THE CENTRAL ARIZONA PROJECT

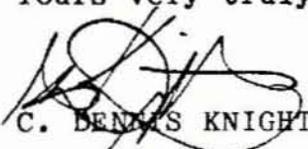
Dear Sir:

I am a member of the Rio Salado Association and have had the opportunity to review "An Analysis of the Environmental Enhancement Opportunities Contained in the Draft Central Arizona Project Regulatory Storage Division Environmental Impact Statement Filed April 29, 1983" prepared by the Rio Salado Development District.

I am taking this opportunity to advise you of my strongest support for the position of the District and to express my concern over any alternative which might not provide for complete development of the Salt River bed for recreational and wildlife uses as well as for ground water recharge. It is my opinion that the Rio Salado Project is a critical factor to the enhancement of the quality of life for residents of the Valley and to the prospects for future growth in the area.

Thank you for consideration of my remarks.

Yours very truly,


C. DENNIS KNIGHT

CDK:ja

Responses to Comments
C. Dennis Knight

4-1 See response to General Comment #1.

UNIVERSITY
GOLF PLAYERS
INC.



5

OFFICE OF THE ATTORNEY GENERAL
JUN 21 1983
706
6/21 7/00 SW
TEMPE, ARIZONA 85281
6/20 7/10 A
June 20, 1983
File

2200 EAST UNIVERSITY

TEMPE, ARIZONA 85281

Project Manager
Bureau of Reclamation
Arizona Projects Office
Suite 2200 Valley Center
Phoenix, Arizona 85073

Re: Draft Environmental Impact Statement for the Regulatory Storage
Division of the Central Arizona Project

Greetings:

Much to my regret I am going out of town and will be unable to attend any of the public hearings on the above. However, by this letter, I would like to express my feelings on the subject.

No question about it, water is the most precious natural resource we have. Its value is beyond estimation, and I do not envy those persons to whom falls the responsibility of allocating what Arizona has to go around. Priorities for agriculture, industry and commerce, municipal use and human consumption are difficult to establish I'm sure. Individuals and groups presenting arguments for each of these segments of our society have good foundation and appeal for their requests and demands. The valley has grown and is going to continue to grow beyond most of our wildest expectations.

Fifty years ago as a boy growing up here in the valley we spent a lot of our recreation time in the Salt River. Today more man-hours of recreation time are spent on our rivers and lakes than in all other forms of recreation activity combined. The development of the "boggy slough" in Scottsdale was one of the finest things I have seen and serves to emphasize our need for more development of inner-city open space into multi-use recreation.

Five years ago we developed a Golf complex. In the ensuing years I have been strongly impressed that our open space recreation development is not keeping pace with our residential, commercial and industrial advancement.

For this reason and because I've spent my life here and love this valley, I strongly support the Rio Salado Development plan for the Salt River.

I urge you to place very high on your list of priorities the granting of the needed water (30,000 annual acre feet) to enable them to fully implement a most needed part of their program.

1

2

More and more the Valley of the Sun is becoming the Valley of Retirement, the over sixty crowd is increasing faster than any other segment of our population, while we are adding years to our life we must add life to our years. The Rio Salado Project will go a long way toward accomplishing this.

Thank you.

UNIVERSITY GOLF PLAYERS, INC.

Gordon L. Jones
Gordon L. Jones

Responses to Comments
University Golf Players Inc.

- 5-1 See response to General Comment #1.
- 5-2 See response to General Comment #2.

6

Arizona House of Representatives
Phoenix, Arizona 85007

June 20, 1983

BURTON S. BARR
MAJORITY LEADER

OFFICE	702
RECEIVED	JUL 23 1983
	#6
gpb	700
WCE	70
	150
	SUM

Project Director
Bureau of Reclamation
Arizona Projects Office
Valley Center, #2200
Phoenix, AZ 85073

Gentlemen:

I will be unable to attend the June 21 and 22, 1983, Bureau of Reclamation public hearings on the Draft Environmental Impact Statement for the Regulatory Storage Division of the Central Arizona Project.

Therefore, I would like to submit a letter for the record favoring the position of the Rio Salado Development District.

1

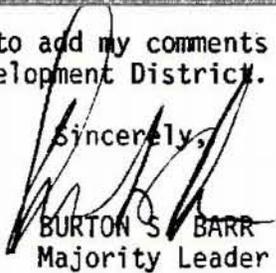
Countless benefits will result from a continuous release of 30,000 annual acre/feet of water into the Salt River below Granite Reef Diversion Dam. This commitment would mitigate negative impacts on fish and wildlife habitat as well as significantly improve the social, economic and recreational benefits available in the Rio Salado Project.

2

3

Thank you for the opportunity to add my comments in support of the position taken by the Rio Salado Development District.

Sincerely,



BURTON S. BARR
Majority Leader

:SO
cc: James E. Pederson, Chairman
Rio Salado Board of Directors

Responses to Comments
Arizona House of Representatives

- 6-1 See response to General Comment #1.
- 6-2 See response to General Comment #2.
- 6-3 See response to General Comment #3.

7

8208 E. Lincoln Dr
Scottsdale, Az. 85253
June 18, '83
706 #17

Project Manager
Bureau of Reclamation
Water Control Bldg
Suite 200
Phoenix, Az. 85003
Dear Sir:

CP 700 SUM
4/28 710

I support the National
Alternative Plan because
all other alternatives include
dredging.

I insist on an environmen-
tal and economically sound
course because of our wild
river systems and their
wildlife.

Sincerely,
Maryalice Wright

Mrs. Thomas Wright
8208 E. Lincoln Dr.
Scottsdale, Az. 85253

Responses to Comments
Mary Alice Wright

- 7-1 See responses to General Comments #4.
- 7-2 See responses to General Comment #5 and #6.

8

700

JAN ELLIOTT
P.O. BOX 1414
CLIFTON, ARIZONA 85533

June 21, 1983

To THE PROJECT MANAGERS,

#8

I WISH TO EXPRESS MY SUPPORT OF PLAN 8₃
OF YOUR DRAFT ENVIRONMENTAL IMPACT
STATEMENT, THE NO ACTION ALTERNATIVE. 1

ALL OTHER PLANS INCLUDE CLIFF DAM, A DAM
WHICH IS UNWISE, ^{AN} UNNECESSARY EXPENSE AND
DESTRUCTIVE TO WILDLIFE HABITAT.

CLIFF DAM IS UNWISE SINCE IT WILL ENCOURAGE
FURTHER FLOOD PLAIN DEVELOPMENT IN PHOENIX,
A DANGEROUS TREND. 2

THE DAM IS AN UNNECESSARY EXPENSE
BECAUSE THE SAME GOALS CAN BE ACCOMPLISHED
LESS EXPENSIVELY BY RELEASING WATER
FROM UPSTREAM RESERVOIRS DURING FLOOD
SEASONS.

I ALSO OPPOSE CLIFF DAM FOR THE
DAMAGE IT WILL DO TO RIPARIAN HABITAT, AND
ARIZONA'S WILDLIFE.

AGAIN, I SUPPORT PLAN 8, NO ACTION
ALTERNATIVE.

SINCERELY,

JAN K. ELLIOTT

Responses to Comments
Jan K. Elliott

- 8-1 See response to General Comment #4.
- 8-2 See responses to General Comments #5 and #6.

930 WEST GARY WAY, PHX, 85041

JUL 27 1983

#9

JUNE 21 1983
428 700 SW

9

U.S. BUREAU OF RECLAMATION
201 NORTH CENTRAL AVENUE
PHOENIX, ARIZONA, 85004

RE: EIS - CAP RESOURCES STORAGE DIVISION
RIO SALADO WATER RIGHT - WASTE

RIO SALADO PROJECT IS AN UNECONOMICAL
CONCEPT WHICH HAS NO BASIS FOR A WATER USE
RIGHT. IT IS IN DIRECT CONFLICT WITH ALL CAP
AND CAP WATER CONSERVATION OBJECTIVES IN THIS
DESERT METROPOLITAN AREA. ANY REQUEST FOR
WATER OR UNCLAIMED WATER ALLOCATIONS MUST
BE DENIED. UNCLAIMED ALLOCATIONS SHOULD BE
REVIEWED AND ASSIGNED TO HIGHER BENEFIT ENTITIES.

LIMITATION OF THE 100 YEAR FLOOD FLOW
TO 55,000 CFS AT SKY HARBOR AIRPORT IS AN
UNECONOMICAL DECISION IN THAT THE COST OF
CLIFF DAM - PLAN I IS MORE THAN DOUBLED UNDER
PLAN 6 TO ACCOMMODATE RIO SALADO DEVELOPMENT

A FLOW OF 200 CFS (150,000 AF/Y) OR
30 TO 50,000 AF ANNUAL WATER USE BY RIO
SALADO CONCEPT SHOULD NOT BE PERMITTED. 3
AT \$100 PER ACRE FOOT, THE COST OF CAP WATER
REQUIRED WOULD AMOUNT TO \$5,000,000 OR MORE
EACH YEAR. THE IDEA OF DUMPING VERDE RIVER WATER
OUR VALLEYS BEST AND MOST VALUABLE DRINKING
WATER INTO THE GARBAGE CONTAMINATED CANALS
OR DIVERTING IT TO THE SALT-GILA AQUEDUCT WOULD BE
AN UNSPEAKABLE SIN, CONTRARY TO ESTABLISHED
WATER PRACTICE, USE, AND RIGHTS.

W/ATTCHMTS. 6 SHTS.

JOHN H. SHANNON '29E
WATER RESOURCES ENGINEER

RESPONSE FORM

We would appreciate your comments on the plans described in this Factbook. For mailing: Please fold with address showing; tape or staple edge. No postage is required.

SEPT. 27, 1981

Which plan do you prefer, and why? "PLAN 6" THE ALTERNATE PROVIDING THE GREATEST ADVANTAGE TO THE PEOPLE OF ARIZONA.

1. WATER QUALITY - CAP WATER, BECAUSE OF ITS IMPURITY SHOULD NEVER BE MIXED WITH THE SALT-VEGETAL SUPPLY. WATER PURIFICATION COST TO METRO-PHONIX WOULD BE OF SERIOUS ECONOMIC MAGNITUDE. IRRIGATED VEGETATION WOULD BE DEGRADED.

2. WATER QUANTITY - PROVIDES BEST YIELD COMPATIBLE WITH ALL OTHER DESIRED ASPECTS WITHOUT ALTERING THE

Other comments on the plans: CONJECTURES OF THE SALT RIVER PROJECT. THE PRESENT EXTENT OF PHOENIX METRO AREA NOW EXCEEDS THE FORESEEN WATER SUPPLY.

3. GROUNDWATER - SINCE ALLOCATIONS OF CAP WATER TO METRO-PHONIX ARE INADEQUATE, EXISTING WELLS MUST BE RETAINED AND MAINTAINED FOR PERIODS OF PROTECT ANNUAL MAINTENANCE AND THE EXTREME DROUGHT OF THE PAST NOT YET EXPERIENCED IN OUR TIME. GROUNDWATER RECHARGE SHOULD BE REINSTITUTED FROM VALLEY CANALS.

4. REGULATION - STORAGE UPSTREAM OF PHOENIX PERMITS FAVORABLE OPERATION OF THE CAP ARROWDLET, AND METRO-PHONIX AND TUCSON WATER SUPPLY.

5. SAFETY OF DAMS - THIS PLAN PROVIDES BEST FOR THE EXTREMES OF MAJOR FLOOD AND EARTHQUAKE THREAT TO OUR WATER SUPPLY AND SAFETY.

6. ENVIRONMENT - IMPACTS ALL THE ELEMENTS: AIR QUALITY, LAND, HABITAT, WILDLIFE AND HERITAGE TO THE LEAST PRACTICABLE DEGREE.

7. FEASIBILITY - THE ESTIMATED COST IS MOST REASONABLE, WITHIN THE SCOPE AUTHORIZED, WITH FAVORABLE BENEFIT/COST FOR PROVISION OF WATER TO ARIZONA. IT

AVOID THE PITFALLS OF EXISTING LAW AND THE COURT.
E. TRUST -- UNDER PLAN 6 WE MAINTAIN OUR
INTEGRITY AND THE RIGHTS GRANTED TO OTHERS.

John H. Shannon P.E.
730 West Grand Way
Phoenix, AZ 85041

P.S. We are fortunate to have been able to
EXAMINE OUR ALTERNATIVES IN TIME TO MAKE A
PROPER DECISION.

(FOLD)

(FOLD)



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UNITED STATES

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FIRST CLASS PERMIT NO. G-110 PHOENIX, ARIZONA

POSTAGE WILL BE PAID BY ADDRESSEE

Bureau of Reclamation
Arizona Projects Office
Suite 2200, Valley Center
201 North Central Avenue
Phoenix, Arizona 85073



MARCH 2, 1981^{of}

HONORABLE CONGRESSMAN:

CAWCS IS PROVIDING THE RESIDENTS OF SALT RIVER VALLEY WITH THE FEASIBLE ANSWER TO THE PROBLEMS OF FLOODING AND C.A.P. COMPATIBILITY. WE ARE FORTUNATE TO HAVE COME DOWN THIS PATH. ORME DAM IS NOT THE ECONOMICAL SOLUTION TO VALLEY FLOODING DUE TO THE MANY CONSTRAINTS GOVERNING DESIGN AT THAT LOCATION.

HAVING PROVIDED YOU WITH MY CONCLUSIONS IN THE PAST (ATTACHED AND MODIFIED) I DO SO AGAIN IN SUMMARIZING THAT THE FOLLOWING ELEMENTS CONSTITUTE THE ECONOMICAL SOLUTION TO OUR PROBLEMS -

- 1- CONSTRUCT NEW WADDELL DAM FOR CAP FLOW REGULATION STORAGE
- PLAN I → 2- CONSTRUCT CLIFF DAM FOR VERDE RIVER FLOOD CONTROL STORAGE
- 3- RAISE ROOSEVELT DAM FOR SALT RIVER FLOOD CONTROL STORAGE AND PROTECTION OF DOWNSTREAM WATER SUPPLY AND POWER DAMS
- 4- USE THE 150,000 CFS CAPABILITY OF THE SALT RIVER CHANNEL AND THE BRIDGES WE ARE BUILDING (10%)
- 5- AUTHORIZE MAINTENANCE AND OPERATION OF C.A.P. BY OUR OWN EXPERIENCED AND EQUIPPED SALT RIVER PROJECT

YOURS VERY SINCERELY,
 John H. Shannon
 730 WEST GARY WAY
 PHOENIX, 85041

ALTERNATIVES - ^{Page} ORME - FEB. 1, 1981 ^{of}

THE MAYOR IS ENTITLED TO HER OPINION;
BUT, SHE IS IGNORING THE NEEDS OF THE
PEOPLE OF PHOENIX FOR THE ECONOMICAL
SOLUTION TO AN ENVIRONMENTAL PROBLEM.

SALT RIVER IS NO INDIAN BEND WASH.
FLOWS ARE SIZEABLE AND VELOCITIES, DO TO
CHANNEL SLOPE, ARE AT LEAST DOUBLE. BRIDGE
ARE NEEDED AND A NUMBER ^{ARE} SCHEDULED FOR
CONSTRUCTION FOR 150,000+ CFS CAPABILITY.
THE RIO SALADO MUST THEREFOR BE MODIFIED
TO BE COMPATIBLE WITH THE 150,000 CFS FLOW.

OTHERWISE, WE WILL SPEND UNREASONABLE
DOLLARS FOR BRIDGES AND UNREASONABLE
DOLLARS FOR DAMS, ON A POSSIBLY, NEVER
TO BE FUNDED, RIO SALADO CONCEPT.

JOHN H. SHANNON 2/2/81

(730 WEST GARY WAY
PHOENIX, 85041)

12/7/80

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CONCRETE ARCH DAM WATER CONTROL STORY (1 OF 2)

THE HEIGHT OF ROOSEVELT DAM CAN BE INCREASED TO WHATEVER STORAGE AND FLOOD REGULATION LEVEL IS REQUIRED, FOR THE FOLLOWING REASONS:

- 1 - THE FOUNDATION IS GOOD.
- 2 - THE MATERIALS USED ARE GOOD.
- 3 - THE CONSTRUCTION IS GOOD.
- 4 - THE STRUCTURE IS OF THE SAFEST TYPE (AND ABLE TO STAND OVERTOPPING).
- 5 - THE DAM CAN BE READILY MODIFIED.

ALTERATION WILL REQUIRE THE INGENUITY OF A MASTER ARCH DAM ENGINEER. STIFFENING OF THE EXISTING UPPER PORTION OF THE DAM WILL BE NECESSARY AND ADDITION OF A FLOATING THIN ARCH IS SUGGESTED. A NECESSARY CONDITION FOR INCREASING THE HEIGHT OF ROOSEVELT DAM IS CONSTRUCTION OF A FOUR LANE HIGHWAY BRIDGE (ARCH)

100 -

(11/12)

UPSTREAM OF THE DAM.

LOUIS C. HILL PLANNED, SITED,
DESIGNED, CONSTRUCTED AND DEFENDED
THE BUILDING OF ROOSEVELT DAM
WITH FORESIGHT, ~~AND~~ WITHIN THE
CONSTRAINTS OF THE RECLAMATION SERVICE,
FOR ENDURING USE.

JOHN A. SHANNON

730 WEST GARY WAY
PHOENIX ARIZONA
85041

cc. SALT RIVER PROJECT

ARIZONA WATER COMMISSION

Responses to Comments
John H. Shannon, P.E.

- 9-1 The purpose of this EIS is to describe and evaluate the proposed construction and operation of the Regulatory Storage Division of the CAP. Decisions on the implementation of Rio Salado are beyond the scope of this document.
- 9-2 Providing flood control to 55,000 cfs at Sky Harbor Airport is economically justified. The Cliff Dam proposed for Plan 6 is the same as the Cliff Dam in Plan 1.
- 9-3 The Rio Salado Development District has not received a CAP allocation. The Secretary of Interior relied primarily on the recommendation of ADWR to allocate CAP water to non-Indian users. If all CAP water is not contracted for, Rio Salado will have the opportunity to seek an allocation through the ADWR process. ADWR would then make a recommendation to the Secretary.