33

PHOENIX METROPOLITAN CHAMBER of COMMERCE

#33

OFFICIAL FILE COPY - ADO

RECEIVED JUN 22 1983

706

6/23 700 SW
6/23 710

June 21, 1983

Project Manager
U. S. Bureau of Reclamation
Valley Bank Center Building
Suite 200
Phoenix, AZ 85073

RE: Draft Environmental Impact Statement on the Central Arizona Water Control Study

Dear Sir:

The Phoenix Metropolitan Chamber of Commerce supports the Plan 6 Alternative to provide the authorized flood control and regulatory storage features of the Central Arizona Project.

Recent experience should erase any doubt about the need for upstream flood control for the Phoenix metropolitan area. Since 1978, our community has been ravished and divided by five major floods. Additionally, the federal government has declared all of the major dams on the Salt and Verde Rivers as unsafe, raising the possibility of a truly catastrophic flood. 1

Regulatory storage, as contemplated to be provided by a new Waddell Dam under the Plan 6 Alternative, is necessary to permit the Phoenix metropolitan area to take full advantage of the Central Arizona Project. This feature will help protect the Valley against fluctuations in the flow of the Colorado River, and permit very beneficial power exchanges.

Flood control and regulatory storage are unquestionably intended by Congress to be part of the Central Arizona Project. The Plan 6 Alternative also clearly reflects a community consensus as to how those features should be provided, being approved by the Orme Dam Alternatives Advisory Committee by a vote of twenty to one. It is clear that Plan 6 -- calling for the construction of new Cliff and Waddell Dams and a new or modified Roosevelt Dam -- provides adequate regulatory storage and flood control in the most beneficial and ecologically sound way.

2 Additionally, we support including in the draft environmental statement a recommendation that the Rio Salado Project receive an allocation of 30,000 acre/ft. per year from the municipal and industrial CAP water in the early years. While ultimately the project will undoubtedly have to depend on nonpotable sources, the enormous benefits that the Rio Salado Project will bring to many communities in the metropolitan area fully justifies this allocation in the early years when a surplus is expected.

Once again, the Phoenix Metropolitan Chamber of Commerce strongly supports the Plan 6 Alternative to provide the authorized regulatory storage and flood control features of the Central Arizona Project. Failure to do so will put our community at significant risk and jeopardize the federal government's investment in the Central Arizona Project.

Respectfully submitted,

Jim Haynes
President

JH/pae

Responses to Comments
Phoenix Metropolitan Chamber of Commerce

33-1 See response to General Comment #7.

33-2 See response to General Comment #2.

34

#34

OFFICE OF THE BOARD OF SUPERVISORS

MARICOPA COUNTY BOARD OF SUPERVISORS
602 County Administration Bldg. 111 S. 3rd Ave., Phoenix, Arizona 85003

602-262-3415

JUL 1 1983

700
750

June 28, 1983

Ed Hallenbeck, Project Manager
Arizona Projects Office
Bureau of Reclamation
201 North Central, Suite 2200
Phoenix, Arizona 85073

Dear Mr. Hallenbeck:

It has come to my attention that among others, the Audubon Society and the Sierra Club appear to be at it again. . . . attempting to stop any reasonable proposition for dealing with flood control affecting the Salt River Valley.

In the past, without trying to repeat all the known problems, the Orme Dam was brought to a halt. The reasons for stopping the construction of the Dam had listed among them the preservation of an eagle's nest which, incidentally, I understand for its own reasons has sought other places to live. The interests of the public in general, in particular as it is related to loss of property as well as loss of life, did not seem to be a consideration of those in opposition. Needless to say, the project was finally brought to a halt.

Much time and talent has gone into studying the problem of flood control and several plans were offered. After very careful consideration, being sensitive to the ecology as well as the human benefit, the Plan 6 was selected. Those of us that were involved to any extent felt that we had finally arrived at a solution that could best serve all concerned and now up pops the Audubon Society and Sierra Club and, perhaps, others who have now decided that the needs of the vast majority of our citizens should be subverted in order to protect two Mexican brown eagles. I am as sensitive as anyone to our wildlife and their habitat, but I also happen to be sensitive to the safety of our citizens and find it very hard to discount the safety of the human being over the protection of some wildlife habitat. 1

I hope that this doesn't sound as if I am without regard for the ecology and wildlife habitat, but I feel that I speak for the majority of people in asking that all concerns put their priorities in the right place.

Sincerely,

George Campbell
Supervisor, District 2

H-113

rz

TOM FREESTONE District 1 | GEORGE L. CAMPBELL District 2 | FRED KOORY, JR. District 3 | HAWLEY ATKINSON District 4 | ED PASTOR District 5

Responses to Comments
Maricopa County Board of Supervisors

34-1 See response to General Comment #7.

35

#35

OFFICE
UNITED STATES GOVERNMENT
RECEIVED JUL 8 1983

memorandum

Action: M(i)
Action Taken _____ Initials

Date	Initials	To
File		

copy NRC 150-700

DATE: July 1, 1983

REPLY TO ATTN OF: ASSISTANT Phoenix Area Director

SUBJECT: Draft Environmental Impact Statement-Regulatory Storage Division, Central Arizona Project

TO: Bureau of Reclamation, Boulder City, Nevada
Attention: Regional Environmental Officer

The purpose of this letter is to provide comments from the perspective of the Bureau of Indian Affairs (BIA) in regard to the above referenced draft EIS.

As you may be aware, the Salt River Project and several other entities have initiated stream adjudications on a number of river systems in Arizona. Some time ago these individual adjudication proceedings were consolidated by the State Supreme Court into two preceedings: the Gila River system adjudication and the Little Colorado River system adjudication.

The largest federal water claims to be asserted in these proceedings will be made on behalf of the Indian tribes located on those watersheds. Accordingly, the role of the BIA in the water adjudications will be substantial, and will require a great deal of time and money. At this time the Bureau is in the process of gathering the data which will be necessary to support the Indian claims.

Because of our role in the data gathering process, and through our work with the Solicitor's Office and the Department of Justice in preparing the Indian claims, we are generally aware of the uses for which water will be claimed in respect of this insight, we see two issues which should be brought to the Secretary's attention in regard to the draft EIS.

First, plans 6 and 7 will provide, according to your calculations, an increased supply of water from the Salt, Verde and Agua Fria watersheds. As we see it, this result is of extreme importance in regard to the water adjudications discussed above. We anticipate that Indian tribes will be granted significant water rights from the Salt, Verde, and Gila Rivers. If that is the case, there will need to be some readjustment of water uses here in the Phoenix valley and possibly elsewhere. It seems that it was with this expectation in mind that the Secretary allocated as much CAP water as possible to the Central Arizona tribes in order to help alleviate that kind of disruption. 1

In any event, it is important to recognize that any increase in the water supply to the Central Arizona area will help reduce the adverse effects of any reallocation of water rights that might result from the adjudications. Accordingly, we think it is important for the Secretary, and the Bureau of Reclamation, to understand the importance of plans 6 and 7 from this perspective.

OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

★U.S. Government Printing Office: 1980—311-153/8042

Secondly, one of the claims to be submitted by the United States will be on behalf of the Ft. McDowell Indian Community. Although that claim has not yet been formally prepared by the Justice Department, we nevertheless have some idea of the scope of that claim and the uses for which water will be claimed. Given the geographical setting of the Ft. McDowell Reservation, along with the historical dependence of that Tribe on the waters of the Verde River, we anticipate that the government will include, among other claims, a claim for water to maintain an instream flow in the Verde River through the reservation. Several years ago the U.S. Fish and Wildlife Service conducted a study to determine the minimum instream flow necessary to meet the fish, wildlife and riparian habitat needs along that portion of the river, and the Service concluded that 200 cubic feet per second was the amount of flow required.

In our opinion, the likelihood of this claim should be of importance to the Secretary in choosing between plans 6 and 7. If the government was to prevail on this claim in the adjudication, we assume that there would be some adverse impact on the water supply or power generation operations of the Salt River Project and downstream water rights holders (of course, there would be no adverse impacts on downstream water rights per se, since the claim would be for a non-consumptive instream flow). However, if the Secretary decided to adopt plan 7 as the best alternative, it would be possible to avoid any disruption since a new, previously unused water source would be utilized to satisfy the instream flow. As we see it, this is an additional benefit to plan 7 which is important for the Secretary to take into consideration along with the benefits from plan 7 listed in your draft EIS. Due to the significant burden that the adjudication will place on the government and private litigants, we believe that it would be wise for the Secretary to seize this opportunity to eliminate a major point of contention, particularly since we expect that the government's claim for an instream flow from the Verde River will be rather strong. **2**

We would appreciate it if you would give serious consideration to the reasons we have advanced in support of plan 7 prior to the preparation of the final EIS. On the basis of the points outlined herein, we will be urging the Secretary to adopt plan 7 as the preferred alternative.

W. Ragsdale

Responses to Comments
Assistant Phoenix Area Director
Bureau of Indian Affairs

35-1 The Fort McDowell Indian Community and the BIA may claim instream flow in the Verde River in the Gila River adjudication. The implementation of Plan 7 may have the benefit of providing that instream flow without upsetting the Salt River Project system.

35-2 Reclamation has applied for a water right for the Central Arizona Project for the yield developed on the Salt and Verde Rivers resulting from the construction of Cliff Dam and New/Modified Roosevelt Dam. This will add to the water supply for central Arizona through the CAP. Increasing the water supply to central Arizona may help to alleviate potential negative impacts of the forthcoming Gila River adjudication.

36

3B

FLOOD CONTROL
DISTRICT
of
MARICOPA
COUNTY
1959

OFFICIAL FILE COPY
RECEIVED JUL 8 1983
DMW

Date	Initial	To

JUL 0 5 1983

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

RE: Statement Number INT DES 83-27

Enclosed is a resolution concerning the subject EIS by the Maricopa County Citizens' Flood Control Advisory Board.

cpy AIR 150 + 7

Sincerely,

D. E. Sagramoso, P.E.

Enclosure

The Citizens' Flood Control Advisory Board of the Flood Control District of Maricopa County convened in the Durango Conference Room at 3335 West Durango Street, Phoenix, Arizona, on June 22, 1983, with a quorum present, and in accordance with the recommendation of the Chief Engineer and General Manager, adopted the following Resolution on the motion made by Dr. J. Piano.

WHEREAS, the Central Arizona Project (CAP) was authorized on September 30, 1968 for the principal purpose of furnishing water for irrigation, municipal, and industrial use in central Arizona through importation of water from the Colorado River and conservation of local water resources; and,

WHEREAS, an overall environmental impact statement (EIS) was filed for the entire CAP on September 26, 1972, which committed the Bureau of Reclamation to prepare site-specific EIS's for individual CAP features; and

WHEREAS, the draft EIS for the Regulatory Storage Division of the CAP describes and evaluates the proposed construction and operation of the Regulatory Storage Division being investigated under the title Central Arizona Water Control Study (CAWCS); and

WHEREAS, the alternative plans described in the draft EIS have the principal purposes of increasing the operating efficiency of the CAP; of providing facilities and means to meet the flood control needs on the Salt and Gila Rivers through the Phoenix metropolitan area; and of providing for the structural safety (SOD) of existing Bureau of Reclamation dams on the Salt and Verde Rivers; and

WHEREAS, the six alternative plans analyzed in detail in the EIS include Plan 6, which was selected in November 1981 by the Secretary of the Interior as the agency proposed action which reduces the 200-year flood at Sky Harbor Airport to 92,000 cfs and the 100-year flood to 55,000 cfs; and

WHEREAS, the adoption and implementation of Plan 6 not only provides for increased operating efficiencies for the CAP, secures needed flood control for the Salt, Gila, and Agua Fria Rivers, and meets SOD structural needs for existing dams on the Salt and Verde Rivers, but it will also provide unprecedented opportunities to enhance social, esthetic and economic benefits for the citizens of Maricopa County.

Therefore, now be it resolved that the Citizens' Flood Control Advisory Board:

1 1. Expresses support for implementation of the agency preferred plan, Plan 6, with its inherent flood control measures and safety of dams structural modifications on the Salt and Verde Rivers; and

2 2. Recommends that the incidental flood control protection provided by New Waddell Dam for the Agua Fria River be assured through the adoption of dam operational criteria which would maintain the maximum conservation pool elevation below 1,694 feet MSL, as appropriate, and that the flood control protection thus provided be identified in terms of "a storm" of known return frequency; and

Dated this 22nd day of June 1983.

Lynn Anderson
Chairman, Citizens' Flood Control Advisory Board

ATTEST:

This instrument was acknowledged before me this 22nd day of June, 1983 by Lynn Anderson, Chairman of the Citizens' Advisory Board of the Flood Control District of Maricopa County.

My Commission Expires:

My Commission Expires July 24, 1986

Marcia Sue Hutchler SEAL
Notary Public

Responses to Comments
Flood Control District of Maricopa County

36-1 See response to General Comment #7.

36-2 New Waddell Dam would be operated to maintain water surface elevation below 1,694 when there is a high probability of runoff occurring, generally during the period of March through June. This will permit holding the 200 year flood to releases below 25,000 cfs. Flood control benefits for this operation are currently being computed.

37

#37

OFFICIAL FILE COPY

RECEIVED A JUL 11 1983

Action: MW/KDV

Action Taken _____ Initials

Date	Initial	To
		150
File		

2227 E. Sells Dr.
Phoenix, AZ 85016

July 5, 1983

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

cpy to HPO 700 & 150 M.U.

Dear Sir:

I am writing regarding the CAP Draft Environmental Impact Statement. I have no problem with Waddell Dam, or even with a new Roosevelt Dam, but I object strongly to Cliff Dam. **1**

Cliff Dam will do no more for flood control than Horseshoe and Bartlett have done in the past since it will be managed in the same way. And an earthen dam for protection!

Why not instead let the water flow through metropolitan Phoenix - maintaining a 200,000 cfs flood plain, allowing for maximum open space and a wonderful greenbelt for all Phoenix citizens' enjoyment, and at the same time recharging our underground water. **2**

Everything considered, my overall support would be for Plan 8 - the only plan without Cliff Dam. **3**

Sincerely,

Ruth I. Patterson

Ruth I. Patterson

Responses to Comments
Ruth I. Patterson

37-1 See response to General Comment #6.

37-2 Horseshoe and Bartlett Dams have no dedicated flood control space. Cliff Dam would have dedicated flood control space which would hold flood control releases to below 25,000 cfs.

37-3 See response to General Comments #4 and #5.

38

#38

OFFICE OF THE BOARD OF SUPERVISORS

MARICOPA COUNTY BOARD OF SUPERVISORS
602 County Administration Bldg. 111 S. 3rd Ave., Phoenix, Arizona 85003

602-262-3415

JUN 30 1983

700

June 24, 1983

Project Manager
U.S. Bureau of Reclamation
Valley Bank Center Building
Suite 2200
Phoenix, Arizona 85073

Dear Sir:

I wish to go on record as a supporter of Plan 6 and that I continue to support it.

Sincerely,

Ed

Ed Pastor
Supervisor, District 5

EP/nm

TOM FREESTONE District 1 | GEORGE L. CAMPBELL District 2 | FRED KOORY, JR. District 3 | HAWLEY ATKINSON District 4 | ED PASTOR District 5

Responses to Comments
Maricopa County Board of Supervisors

38-1 See response to General Comment #7.

39

#39

PHOENIX BOARD OF REALTORS®, INC.

5033 North Nineteenth Ave., Suite 119 • Phoenix, Arizona 85015-3294
Phone (602) 246-1012

1983 BOARD OF DIRECTORS

OFFICERS

PRESIDENT
JAMES SASSER, GRI, CRS

FIRST VICE PRESIDENT
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SECOND VICE PRESIDENT
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ED PAUER
DEAN ULLMANN
CHARLES WING
1983-84
CHARLOTTE KYDD

June 27, 1983

700

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

Dear Sir:

The Board of Directors of the 4500-member Phoenix Board of Realtors concurs with the analysis by the Rio Salado Development District of the "Draft Environmental Impact Statement for the Regulatory Storage Division of the Central Arizona Project."

We believe the proposal to provide water for the Rio Salado project would create unprecendented opportunities to enhance the social, aesthetic and economic benefits of the citizens of this area. 1

The feasibility of Rio Salado being the site for large-scale ground water recharge has been one of the prime reasons for our support of the project all along.

Water could also be recirculated thru the project.

The positive nature of a fully developed Rio Salado will have an even greater effect on Maricopa County than the diversion of the river has had in San Antonio.

We urge an allocation of 30,000 annual acre feet of water to be released for Rio Salado. 2

Sincerely,

Jim Sasser

Jim Sasser
President

JS/mr

H-127

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Responses to Comments
Phoenix Board of Realtors, Inc.

39-1 See response to General Comment #1.

39-2 See response to General Comment #2.

40

John R. Norton III
P.O. BOX 10807
PHOENIX, ARIZONA 85036

JUN 29 1983

#40

June 28, 1983

Project Manager
U. S. Bureau of Reclamation
Valley Bank Center Building
Suite 2200
Phoenix, Arizona 85073

Dear Sir:

The development of the Plan 6 alternative to the construction of Orme Dam was given almost unanimous community support which was achieved after a prolonged public discussion that thoughtfully weighed the many conflicting interests in the complicated issues involved. It would be a most unfortunate and costly injustice if Central Arizona was subjected to a delay for any further review of this subject. 1

Any public project of this magnitude will necessitate that compromises be achieved among the various special interest groups. The almost unanimous endorsement of Plan 6 indicates a breadth of support which is unusual and commends the plan to a prompt implementation.

Sincerely,

John R. Norton III

ah

cc: Congressional Delegation
Governor Bruce Babbitt
Mayor Margaret T. Hance

Responses to Comments
John R. Norton III

40-1 See response to General Comment #7.

41

OFFICIAL FILE COPY - APO
JUL 5 1983
#41
700

3224 East Sweetwater
Phoenix, Arizona 85032
June 30, 1983

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

Dear Sir:

Recently hearings were held on the Cliff Dam project. It was impossible for me to appear, and I sincerely hope you will take a moment to read my viewpoint.

Incidentally, in the recent Colorado River debacle, I was one of the earliest and most vigorous to remind people that it was foolish to build in a floodplain, and that I could well remember over the years having read many times the warnings that it would at some time be necessary to release water from Hoover Dam, etc. Without dwelling further on that aspect, the Bureau did have my support in those occurrences.

With regard to Cliff Dam: I do not believe anyone has the necessity to utilize a floodplain for construction of buildings of any type. There is no shortage of open desert; floodplains can be used, if they must be used, for recreational facilities of the type which would not call forth words such as "tragedy," "disaster" when the river needs to run - as run it must at some time. 1

Additionally, earthen dams, frankly, scare me to death. I firmly believe each earthen dam is a disaster waiting to happen. Sorry, but that's the way I feel. And one 300 ft. high? Do you realize how much water can come roaring out from behind a 300 ft. high dam, once broached?

We have no need to dam up every inch of every river in our formerly magnificent country. It used to be pleasurable to drive along the Colorado River in western Colorado, but the last time I was through there, all I saw was still water, backed up behind some dam. Might as well fly. And speaking of flying - need we destroy all wildlife in our quest to pave the earth? Why not let a couple of eagles survive?

As a taxpayer, I strongly feel we don't have the funds necessary to promote a project such as Cliff Dam. I'm struggling to pay my own household bills, and resent money being wasted on "flood control" projects that in reality are to make it possible for someone (who?) to make money on land speculation in a floodplain - incidentally, setting up more victims for a future date.

I'm not a lawyer, with educated phraseology at my fingertips. Neither am I a debater or politician. Getting my point across isn't easy. But I hope I have done so, and that you will seriously consider the viewpoint of this citizen and taxpayer. Thank you for your attention.

Sincerely,

Kathleen Rhodes

Kathleen Rhodes

Responses to Comments
Kathleen Rhodes

41-1 See response to General Comments #6 and #8.

42

#42

Office of the Mayor and City Council

June 28, 1983

Project Manager
U. S. Bureau of Reclamation
Valley Bank Center Building
243 North Central - Suite 2200
Phoenix, AZ 85073

Dear Sir:

The City of Scottsdale fully supports the selection and ultimate implementation of the Plan 6 alternative for Central Arizona Project regulatory storage, flood control and dam safety. As a member of the Arizona Municipal Water Users Association, we have already expressed our support for the valley-wide benefits of this plan.

We believe that the flood control benefits are an important consideration of this plan. In particular, it is critical to protecting the sewer trunk lines and treatment facilities to which most of our community is connected.

1

We are very interested and supportive of the plan's ability to amplify our precious fresh water resources. The potential of capturing an additional 143,000 acre feet per year is important to our valley. In addition, this plan will greatly enhance the ability to recharge our groundwater resources.

Most importantly, this plan will supplement and encourage the development of the Central Arizona Project. The development of the C.A.P. is very important in supporting existing uses and the healthy growth of our community.

We appreciate the opportunity to review and comment on these options and look forward to working towards the development of the Plan 6 alternative.

Sincerely,

Jeff Schubert
Vice Mayor

/mw
Copy to: Mayor Drinkwater
Mr. Roy Pederson
Ms. Elaine Arena
Mr. William King
File

3939 CIVIC CENTER PLAZA ■ SCOTTSDALE, ARIZONA 85251 ■ PHONE (602) 994-2521

Responses to Comments
City of Scottsdale
Office of the Mayor and City Council

42-1 See response to General Comment #7.

43

103[illegible] E. BUENA VISTA DRIVE
TEMPE, ARIZONA 85284

#43

JUL 6 1983

700

July 1, 1983

Project Manager
CAWCS
U.S. Department of Interior
Bureau of Reclamation
Suite 2200, Valley Center
201 N. Central Ave.
Phoenix, AZ 85073

Re: Comments on the Draft EIS for Plan 6

Dear Sir:

I'm afraid we are now seeing the same devisiveness over Cliff Dam that we lived through with the Orme dam controversy. It makes it difficult to speak out without being labeled in one or another "camp".

So my first plea is for encouraging open discussion of concerns. Let us assume that discussion will lead to a better, more refined plan and not destroy the entire project.

As a member of the Governor's CAWCS Advisory Committee I have listened to and been part of the discussion of water storage and flood control issues for years. I listened to the majority of the citizens of the valley say they wanted flood control only to the extent that their homes were protected and above all that the traffic problem be worked out with more bridges. I also listened to the agency professionals as they demonstrated the need for more flood control on the Verde if the valley is to be protected from a catastrophic flood and if any vision of the Rio Salado could be a reality.

But now we seem to be wedded to the magic 50,000 cubic feet per second protection for the highest density Rio Salado development, which would include building down into the Salt River floodplain. To me this is courting disaster as time agin we are reminded that we have yet to triumph over natural disaster and human error.

At the same time we are wondering where the money is to come from for any of the components of Plan 6.

Therefore I think it is legitimate to raise questions on the extent of flood control need on the Verde. Will a dam which is a main component in a system offering 50,000 c.f./s. as a
1 maximum release lull us into complacency? Or do we need to plan for larger releases by our zoning in the valley? What is the most economical way to achieve this? These are important questions in light of the recent Colorado River problems, and therefore we may not be ready to make a firm decision on this aspect of Plan 6.

Sincerely,

Eva Patten

Eva Patten

Responses to Comments
Eva Patten

43-1 See response to General Comment #5.

#44

OFFICIAL FILE COPY
RECEIVED A JUL 13 1983
Action: MW
Date | Initials | To
150
File

BRUCE BABBITT, Governor

Commissioners:
FRANK FERGUSON, JR. Yuma, Chairman
FRANCES W. WERNER, Tucson
CURTIS A. JENNINGS, Scottsdale
IN J. GISI, Flagstaff
ED S. BAKER, Elgin

Director
BUD BRISTOW

Deputy Director
ROGER J. GRUENEWALD

44

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023

July 11, 1983

Mr. E. M. Hallenbeck, Project Manager
Central Arizona Water Control Study
U.S. Bureau of Reclamation
Arizona Projects Office
Suite 2200 - Valley Center Building
201 North Central Avenue
Phoenix, Arizona 85073

Re: Draft Environmental Impact Statement (DEIS) - Regulatory Storage Division Central Arizona Project

Dear Mr. Hallenbeck:

The Arizona Game and Fish Department has reviewed the above-referenced document and the following comments are provided.

Our Department believes the DEIS, in its current form, is basically inadequate. We would hope the areas that require further clarification can be amended prior to the development of a final document.

Our initial concern centers around the apparent lack of detailed information relating to the Operation Plans for the reservoirs to be constructed. Many of the impacts likely to be associated with this phase of the project critically affect Department goals and objectives. **1**

Secondly, we feel the Final Environmental Impact Statement for this action must include an appropriate mitigation package detailing reasonable and prudent compensation measures which carry the Bureau of Reclamation's full commitment for implementation. **2**

Finally, we feel that should the documentation previously discussed be unavailable for incorporation into the final document, an additional Environmental Impact Statement covering the Operational phase of the project would be required. **3**

An Equal Opportunity Agency

Detailed comments pertaining to the DEIS are attached to this letter. Please contact our staff in the Region VI (Mesa) Office if further clarification is necessary, or if you have any questions concerning the content of the review.

Sincerely,

Bud Bristow, Director

Roger J. Gruenewald
Deputy Director

RJG:JEB:dd

Attachment

cc: N. W. Plummer, USBR Regional Director, Boulder City, Nevada
Don Metz, USFWS, Phoenix
State Clearinghouse, 83-80-0021

REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
REGULATORY STORAGE DIVISION
CENTRAL ARIZONA PROJECT

I. SUMMARY

Page 7, Table 2, Commparative Evaluation of Alternatives:

The document, in its current state, inaccurately depicts the impact Plan 6 would have on endangered species. Appendix F clearly identifies the Fish and Wildlife Service's Biological Opinion, under Section 7 of the Endangered Species Act, as a jeopardy decision. This section should be amended to indicate the results of this consultation. Also, it seems inconceivable that Plan 7, which is essentially identical to Plan 6, should result in additional impacts to endangered species. **4** **5**

Page 8, 3rd Paragraph, C. Comparative Analysis of Alternatives:

See above comment. **6**

Page 13, 2nd Paragraph, 5. New Waddell Site Area:

The statement declaring that no perennial streams occur within the site area is erroneous. Morgan City Wash, a spring fed system, with a significant riparian canopy provides habitat for the longfin dace (*Agosia chrysogaster*), a native cyprinid, and will be directly impacted by the proposed action. **7**

Page 17, Table 4, Summary of Environmental Impacts and Effects of Plans:

Threatened and Endangered Plants and Wildlife, Plan 6

Impacts and effects to breeding bald eagle areas resulting from operational activities have yet to be determined. We feel the arbitrary, insignificant impact rating is somewhat premature. Also, the results of the Section 7 consultation have been omitted. **8**

Riparian/Wetland Biotic Communities, Plan 6

Any loss of riparian or wetland areas in an arid state, such as Arizona, must be viewed as a significant regional impact. Without a commitment by the Bureau of Reclamation to mitigate, we believe these impacts are anything but insignificant. **9**

Page 18, Table 4, continued:

Perennial Stream/Riverine Communities, Plan 6

The depicted positive gain in stream miles is erroneous. Without significant habitat manipulation, the shifting and eroding sediments of Horseshoe Lake will not provide habitat for lotic organisms.

10 The six miles of perennial stream to be inundated by Cliff Dam have been classified as a Category 2 Resource by the U.S. Fish and Wildlife Service. Mitigation requirements for a Category 2 Resource entail like and in-kind compensation, with no net loss in habitat units. Therefore, our Department feels habitat manipulation of the Horseshoe Lake bed should be required to satisfy the objectives.

11 The statement relative to a "no change" situation in flow characteristics for the Salt and Verde Rivers cannot be substantiated at this time. Operation regimes have yet to be delineated. Furthermore, according to the Bureau of Reclamation Staff Hydrologists, thermal loading studies are six months away from completion.

Reservoir Aquatic Communities, Plan 6

Inactive storage space at New Waddell, with a depth of two feet at the end of the project's life, does not constitute a minimum pool. We feel the Bureau of Reclamation should commit 12 adequate portions of the total live storage capacities for all reservoirs to be constructed and/or modified, to be designated as minimum pools. This would ensure the survival of fish populations as well as guarantee anglers and piscivorus wildlife species an adequate recreation and forage base, respectively.

Also, we strongly urge the Bureau of Reclamation to make commitment to reduce drawdown rates to less than two inches per day. Without such a commitment, habitat suitability for largemouth bass and other centrarchids will be zero.

Page 19, Table 4, continued:

Water Quality, Plan 6

13 Our Department views the reduction in habitat suitability for largemouth bass, which will result from the increase in TDS at New Waddell, a significant impact, and we feel it should be designated as such.

Page 22, Table 4, continued:

14 Resource categories such as Terrestrial habitat and Special Use Areas have been omitted from this section.

II. Alternatives Including the Proposed Action

Page 16, b. Operational Activities:

Without the opportunity to review detailed operating plans for the reservoirs to be constructed, we find ourselves unable to adequately assess potential impacts (e.g. reservoir fluctuations and a potential nutrient block at the Cliff) to the resources involved. Also, without these data, we do not feel the Bureau of Reclamation has demonstrated the capability to progress to the construction phase of the project. **15**

Page 23, 1st Paragraph, (1) Construction Considerations:

How will the existing Horseshoe Dam be breached? What impacts or impediments will result to the reclamation of the riverine habitat to be created. **16**

Page 41, Table II-8, Design Details - Plan 6, New Waddell Dam:

Figures provided in the Field Draft Environmental Impact Statement relative to the minimum pool have been omitted from this table. **17**

Page 46, Table II-10, Comparative Evaluation of Plans:

See comments provided for Summary Table 2. **18**

III. Affected Environment

Page 55, 3rd Paragraph, (5) Threatened and Endangered Plants and Wildlife:

19

The subspecies of Colorado roundtail chub which occurs in the study area is Gila robusta robusta. Also, the yellow mud turtle does not inhabit the study area, the species present is the sonoran mud turtle (Kinosternon sonoriense).

Page 107, Threatened and Endangered Plants and Animals:

State-listed species have been omitted from this section. **20**

IV. Environmental Consequences

Page 120, 2nd Paragraph, (1) Construction and Inundation Impacts:

21

Our Department is categorically opposed to the indiscriminant clearing of all vegetation within the MSP. Selective reservoir clearing is an accepted practice by the U.S. Department of the Interior to maintain valuable cover necessary to fish and other wildlife forms.

Through the U.S. Fish and Wildlife Service, we provided your agency an estimate of the costs required to mitigate these impacts. Estimates for the creation of artificial cover, excluding the clearing costs, were several million dollars.

When the type and limited amount of vegetation to be retained can in no way jeopardize the operation of the reservoir, and when significant benefits are to be gleaned by its retention, total and indiscriminant clearing is illogical.

Page 121, (2) Dam Operation Impacts:

22 The section is inadequate. Please refer to our comments provided for Page 16.

Page 125, (b) Plans 1, 2, 3, 6, and 7:

23 See comments for Table 4 and Page 120.

Page 130, (b) Plans 1, 2, 3, 6, and 7:

24 See comments for Table 4.

Page 132 and 134, (b) Plans 1, 2, 3, 6, and 7:

25 We agree that increases in TDS levels in Lake Pleasant will not eliminate the sport fishes present; however, the quality of their aquatic environment will be significantly reduced.

Page 134, 4th Paragraph, (b) Plans 1, 2, 3, 6, and 7:

26 The question of survival of Colorado River ichthyofauna has never been an issue. Most biologists agree immigration is inevitable. Our Department is concerned with the impacts which are likely to result.

Page 137, (b) Plans 1, 2, 3, 6, and 7:

27 Results of the 1983 Section 7 Consultation, the Fish and Wildlife Service's Biological Opinion, should be included within this section.

Page 139, (2) Mitigation:

28 See comments above.

Pages 139 and 140, Special Use and Management Areas:

29 Construction and recreation impacts to the Roosevelt Lake Wildlife Area, as well as the proposed mitigation required to compensate for these impacts, has been omitted from this section.

Page 141, j. Impacts with Modified Roosevelt and Modified Stewart Mountain Dams in Plans:

See comments above.

Page 146, Table IV-17, Biological Resources Net Impact/Effect for Plan 6:

See comments for Table 4. **30**

Pages 163 to 173, Recreation:

Impacts to wildlife resulting from increased use levels have not been addressed. Specifically, discussions of impacts to the Roosevelt Lake Wildlife Area as well as potential conflicts with endangered species which may arise in the Medler Point area should be included within this section. **31**

Pages 235 to 237, Table IV-41, Summary of Environmental Impacts and Effects of Plans:

See comments for Table 2 Summary and Table 4. **32**

Pages 251 and 252, c. Threatened and Endangered Species:

See comments provided for Page 137. **33**

Page 272, Table IV-49, Relationships and Tradeoffs between Short-Term Uses of the Environment and Long-Term Enchancement for the Proposed Action: **34**

The analysis provided fails to address likely impacts resulting from the introduction of Colorado River ichthyofauna and possible ramifications of nutrient blockage by Cliff Dam.

Responses to Comments
Arizona Game and Fish Department

44-1 See response to Comment 3-1.

44-2 See response to Comment 3-2.

44-3 See response to Comment 3-4.

44-4 Table 2 has been revised to include issuance of the jeopardy opinion.

44-5 The additional impacts to endangered species, riparian habitat, and cultural resources in Plan 7 are based on the additional storage of water in Cliff Reservoir. This additional water was to be used for instream flows in the Verde River downstream of Cliff Dam.

44-6 This paragraph has been revised to reflect the comments.

44-7 The text has been changed to reflect the presence of Morgan City Wash downstream of the New Waddell Dam site and Tule Creek upstream of the site.

44-8 Table 4 has been modified to reflect the results of the endangered species opinion.

44-9 Commitments to mitigation for Plan 6 are detailed in Section IV.C.1.

44-10 Reclamation is fully committed to recover all habitat values lost in Resource Catagories II habitat. The riverine habitat that will occur in Horseshoe Lakebed will be rehabilitated in a manner to mitigate for the loss of 6 miles of river downstream. More information is needed, however, on the geomorphology of the lakebed to make specific and detailed plans as to how this task will be accomplished.

44-11 See response to Comment 3-25.

44-12 The mitigation plan in Chapter IV details the average drawdown rate for April and May at New Waddell and Cliff Reservoirs. These drawdown rates are within the limits necessary to meet reproductive and habitat requirements of largemouth bass and other centrarchids.

44-13 The reduced suitability for spawning of largemouth bass due to increases in TDS has been taken into account in determining the overall impacts due to Plan 6 for lacustrine habitats.

44-14 These resource communities have been reinserted into the table.

44-15 See response to Comment 3-4.

44-16 See response to Comment 44-10.

44-17 This table has been revised to reflect your comments.

44-18 This table has been revised to reflect your comments.

44-19 The text has been corrected with regard to these two species.

44-20 While state listed species do occur in this area the addition of these species to the text would provide unwarranted detail to this general discussion.

44-21 The mitigation plan in Section IV.3. describes the current clearing plan. Conservation pool clearing will now only occur in areas that have vegetation which may constitute a safety hazard to recreationists and navigation.

44-22 See response to Comment 3-1.

44-23 See response to Comment 3-25.

44-24 This EIS has been modified in accordance with this comment.

44-25 The text has been amended to reflect the lower habitat quality due to increased TDS contributions.

44-26 The possible impacts of importation of Colorado River ichthyofauna is currently being investigated. Additional information is needed to assess the impacts of the striped bass and tilapia on existing fisheries in central Arizona. Cooperative efforts are currently underway with your agency and others to determine the scope of studies required to adequately address this issue and to resolve it.

44-27 The text has been amended to indicate the results of the endangered species opinion rendered by the Fish and Wildlife Service for Plan 6.

44-28 This section contains conceptual mitigation to provide a basis for comparing all alternatives. Reasonable and prudent alternatives provided in the Section 7 opinion are discussed in Section IV.C.1.

44-29 The text has been changed to reflect a loss in habitat quality due to the increased recreation in the area of the Roosevelt Waterfowl Area.

44-30 This table has been revised.

44-31 Impact to wildlife resources are discussed in Section IV 3.i.1.b. and IV.3.i.3.j.

44-32 This table has been modified.

44-33 This section has been changed to reflect the results of the endangered species opinion.

44-34 These two issues will be the subject of studies described in the mitigation plan in Chapter IV.

MAJOR **45** SIGNOFF #45

OMB Approval No. 29-R0218

FEDERAL ASSISTANCE

1. Type Of Action (Mark appropriate box)
- ☐ Preapplication
- ☐ Application
- ☐ Notification Of Intent (Opt.)
- ☐ Report Of Federal Action

2. Applicant's application
a. Number
b. Date 19 Year Month Day

Leave Blank JUL 07 1983

3. State application identifier Number Z 83-80-0021
Date Assigned 19 MAY 25 1983 (Year month day)

Janice Dunn

4. Legal Applicant/Recipient
a. Applicant Name: Bureau of Reclamation
b. Organization Unit: Lower Colorado Region
c. Street/P.O. Box: Box 427
d. City: Boulder City
e. County:
f. State: Nevada
g. Zip Code: 89005
h. Contact Person (Name & telephone no.): Regional Environmental Officer

5. Federal Employer Identification No.

6. Program (From Federal Catalog)
a. Number 1 5 • 9 9 9
b. Title Unknown
DOI, Bureau of Reclamation

7. Title and description of applicant's project DRAFT ENVIRONMENTAL IMPACT STATEMENT-REGUALTORY STORAGE DIVISION-CENTRAL ARIZONA PROJECT

This EIS describes 5 alternatives for the purposed construction & operation of the Regulatory Storage Division of the CAP. The alternatives described provide for CAP Regulatory Storage, flood control for the Salt & Gila Rivers through the Phoenix metropolitan area, & concurrent & coincident (over)

8. Type of applicant/recipient
A–State; B–Interstate; C–Substate District; D–County; E–City; F–School District; G–Special Purpose District; H–Community Action Agency; I–Higher Educational Institution; J–Indian Tribe; K–Other
(Specify): Federal Agency
Enter appropriate letter: K

9. Type of assistance
A–Basic Grant; B–Supplemental Grant; C–Loan; D–Insurance; E–Other
Enter appropriate letter(s): e

10. Area of project impact (Names of cities, counties, states, etc.)
Maricopa, Pinal, and Gila Co., AZ.

11. Estimated number of persons benefiting

12. Type of application
A–New; B–Renewal; C–Revision; D–Continuation; E–Augmentation
Enter appropriate letter: a

13. Proposed Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other	1	.00
f. Total	$ 1	.00

14. Congressional Districts Of:
a. Applicant
b. Project

15. Type of change For 12c or 12e
A–Increase Dollars; B–Decrease Dollars; C–Increase Duration; D–Decrease Duration; E–Cancellation; F–Other Specify:
Enter appropriate letter(s)

16. Project Start Date 19 (Year month day)

17. Project Duration Months

18. Estimated date to be submitted to federal agency 19 (Year month date)

19. Existing federal identification number

20. Federal agency to receive request (Name, city, state, zip code)

21. Remarks added ☐ Yes ☐ No

Section I - Applicant / Recipient Data

22. The Applicant Certifies That
a. To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances if the assistance is approved.
b. If required by OMB Circular A-95 this application was submitted, pursuant to instructions therein, to appropriate clearinghouses and all responses are attached:

	No response	Response attached
(1) Arizona State Clearinghouse	☐	☒
(2) Region I, V, Clearinghouses (MAG) & (CAAG)	☐	☒
(3)	☐	☐

Section II - Certification

23. Certifying representative
a. Typed name and title
b. Signature
c. Date signed 19 (Year month day)

24. Agency name

25. Application received 19 (Year month day)

26. Organizational Unit

27. Administrative office

28. Federal application identification

29. Address

30. Federal grant identification

31. Action taken
- ☐ a. Awarded
- ☐ b. Rejected
- ☐ c. Returned for amendment
- ☐ d. Deferred
- ☐ e. Withdrawn

32. Funding

a. Federal	$	.00
b. Applicant		.00
c. State		.00
d. Local		.00
e. Other		.00
f. Total	$	.00

33. Action date 19 (Year month day)

34. Starting date 19 (Year month day)

35. Contact for additional information (Name and telephone number)

36. Ending date 19 (Year month day)

37. Remarks added ☐ Yes ☐ No

Section III - Federal Agency Action

38. Federal agency A-95 action
a. In taking above action, any comments received from clearinghouses were considered. If agency response is due under provisions of Part 1, OMB Circular A-95, it has been or is being made.
b. Federal Agency A-95 Official (Name and telephone number)

Comment Form To Be Completed by Reviewing Agency

TO:

Dale Buskirk
Advanced Planning Section
Dept. of Transportation
206 So. 17th Ave., Rm 310 B
Phoenix, AZ 85007

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-0021

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

Region I, V

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☒ No comment on this project ☐ Proposal is supported as written ☐ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

Reviewers Signature L.P. Stungley Date 6/3/83

Title State Planner Telephone 255-7251

H-150

Comment Form To Be Completed by Reviewing Agency

TO:

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-0021

Department of Water Resources
Mr. Frank Barrios
99 E. Virginia
Phoenix, AZ 85004

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Region I, V

RECEIVED MAY 26 1983 WATER RESOURCES

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☒ Proposal is supported as written ☐ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No

3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? ☐ Yes ☐ No

4. Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No

5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

H-151

Reviewers Signature Frank M. Barrios Date 5/27/83

Title Dist. Planning Director Telephone 255-1516

Comment Form To Be Completed by Reviewing Agency

TO:

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-0021

Director
Agriculture & Horticulture Dept.
421 Capitol Annex West
Phoenix, AZ 85007

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Region I, V

RECEIVED
MAY 26 1983
ARIZONA COMMISSION OF AGRICULTURE & HORTICULTURE

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

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6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

2 The Commission notified as Required in the Native Plant Law to allow the removal and Salvage of all Protected Native Plants encountered in any construction or flooding.

H-152

Reviewers Signature [illegible] Date 5-26-83

Title Director, Div of Compliance Telephone 255-4373

Comment Form To Be Completed by Reviewing Agency

COOK

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-00

TO: 6-17-83

John J. DeBolske, Exec. Dir.
Maricopa Association of
Government
1820 W. Washington St.
Phoenix, AZ 85007 0613

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Region I, V

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7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

H-153

Reviewers Signature Ken Driggs Cook Date 6/17/83

Title Telephone

Comment Form To Be Completed by Reviewing Agency

TO:

Mr. John Blackburn, Exec. Dir.
Central Arizona Association
of Governments
P.O. Box JJ (1810 Main St.)
Florence, AZ 85232

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-0021

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

Region I, V

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

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6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

H-154

Reviewers Signature [illegible] Date 6-16-83

Title [illegible] Telephone 868-5878

Comment Form To Be Completed by Reviewing Agency

TO:

Robert K. Lane, Acting Commissioner
State Land Department
1624 W. Adams, 4th Floor
Phoenix, AZ 85007
Attn: Robert Yount

State Application Identifier (SAI)

MAY 25 1983 State AZ No. 83-80-0021

Game & Fish
Transportation
Ag. & Hort.
Power
Health
Water
Land
Parks

Region I, V

FROM: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

☐ No comment on this project ☒ Proposal is supported as written ☐ Comments as indicated below

1. Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency

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5. Does project violate any rules or regulations of your agency? ☐ Yes ☐ No

6. Does project adequately address the intended effects on target population? ☐ Yes ☐ No

7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet, if necessary):

H-155

Reviewers Signature Robert Yount Date June 22, 1983

Title Land Manager Telephone 255-4625

Responses to Comments
Agriculture and Horticulture Department
Arizona State Clearinghouse

45-1 See response to General Comment #7.

45-2 See response to General Comment #7.