



Reponses to Comments  
Central Arizona Water Conservation District

- 68-1 See response to General Comment #9.
- 68-2 See response to General Comment.



1128 EAST GENEVA DRIVE

OFFICE		
RECEIVED ARIZONA AUG 20 1983		
Action: <u>MW</u>		
Action Taken		Initials
Date	Initial	To
		130

**OFFICERS**

Herb Fibel  
President  
Susan Ahearn  
Vice President  
Joyce Fibel  
Secretary  
Roberta Willingham  
Treasurer

**COMMITTEE CHAIRMEN**

Scott R. Burge  
Conservation  
Richard Ferguson  
Field Trips  
Elsaine Mayer  
Programs  
Patricia Beal  
Membership  
Frank Salmon  
Education  
Anthony B. Anthony  
Publicity  
Robert Witzeman, M.D.  
Editor

Dear Sirs,

The following pages have been submitted on the draft EIS of the Regulatory Storage Division, Central Arizona Project. The comments assume Plan 3, with its proposed Orme Dam, have been totally deleted from further consideration. The submitted comments focus primarily on Cliff Dam, because of the above factor. The omission of comments on Orme Dam should not be construed as support or indifference to that structure.

The following is a summary of the comments:

- The draft EIS does not present an alternative to Cliff Dam and New/modified Roosevelt Dam for the purposes of NEPA.
- The draft EIS is totally inadequate as to the impacts on riparian habitat from flood plain contraction by upstream dams.
- The main assumption of the study is that SOD and CAP legislation are compatible and mandate particular actions. It appears the agency has exceeded congressional intent of these laws in developing Cliff Dam and New/modified Roosevelt.
- Flood control figures presented in the agency's draft EIS conflict with other reports. The agency appears to have greatly inflated both benefits for flood reduction and "intensification".

*Scott R. Burge*  
Scott R. Burge  
Conservation Chairman

H-277

*Herbert S. Fibel*  
Herbert S. Fibel  
President

This paragraph states in a concise form the major assumption of the CAWCS study. The study assumes that the purposes and objectives of Section 301 (a)(3) of the Colorado River Basin Project Act (P.L.90-537) are compatible with Reclamation Safety of Dams Act (P.L.95-578). The following quotation shows how far the study assumed this fact. "Since the construction and operation of the CAP Regulatory Storage Division and SOD features will involve common timing and locations, the purposes of both authorizing legislations have been combined in the CAWCS."

CAP legislation authorizes the agency to implement "Orme Dam or suitable alternative" for purposes of water storage, flood control, fish and wildlife enhancement and recreation. The Act requires the building of new structures for its delineated purposes. SOD legislation authorizes the agency to implement modification to existing structures with cost assumed by the Federal government. The law does not include provisions for construction of new dams. Recent attempts to change the law to include such new construction have been rejected by Congress. Clearly, the intent of Congress was to protect existing structures with reasonable efforts through modification.

Were the five alternatives in the draft EIS, which all include Cliff Dam and new/enlarged Roosevelt Dam, selected on the basis of SOD or CAP considerations? The indications are, by using Plan 2 as a guide, Cliff Dam (SOD purposes only) was selected and all other Verde River alternatives excluded on the basis of SOD,

not CAP considerations. The submitted comments of Mr. Frank Welsh expand on the thesis that only SOD was used to exclude other possible Verde River alternatives. The result is the selection of alternatives, originally intended to provide regulatory storage for CAP, being selected by a different law, SOD.

The problem is the agency exceeded Congressional intent by offering a new structure for SOD purposes. Plan 2 is the most obvious example. All the Verde River "alternatives" appear to be proposals in search of a law to justify them. The agency has created two dilemmas for Congress and the future of CAP regulatory storage: 1) Can the agency go beyond the SOD law and force components on the CAP which would not have been justified? 2) Will Congress be forced to accept the agency's decision and change the SOD law or finance the new SOD-CAP components under the CAP authorizing legislation itself? The CAWCS is, in effect, dictating to Congress what legislation it "needs".

The SOD law requires reasonable efforts to be found to make dams safe, however, it is obvious the agency is adapting old, established engineering procedures of typical reclamation projects to the new law. Congress is not asking for super water storage or flood control dams, but inexpensive, innovative modifications to pass PMF flows. New laws require new ideas to solve the problems the law seeks to remedy. Failure to recognize the new challenges SOD presents, results in no alternatives on the Verde River.

---

needs. . .". A community's flood control need is an interesting concept, and should not be confused with the appetite of special interests to develop flood plains. A comparison of Inundation Reduction with Location and Intensification on Table IV-35 shows these "5 alternatives" reflect more than a concern for the community's flood control "needs". The community's flood control "needs" apparently now include Federal funding of flood control for Rio Salado Project speculation. Recently, a study showed that a very low percentage of Phoenix residents were even familiar with such a project. Therefore, how does the agency let the desire of a small group of land speculators become part of the "need" of a community? In particular, how does Rio Salado further the aims of the CAP regulatory storage, the primary purpose of this EIS?

Page 8

**3**

"Underground storage was eliminated because of difficult operation associated with institutional and legal problems and because of energy dependency." Why are legal problems dealing with the State insurmountable, but proposed actions, not currently within the bounds of Federal law, acceptable? Apparently, the agency seems willing to conflict with Federal law in an effort to preserve State law.

Page 11

**4**

"Cliff and New/modified Roosevelt Dams were included in all candidate plans for SOD purposes,. . .". SOD, not CAP criteria, was used to select "the 5 alternatives" as was previously indicated in these comments. Does the agency believe Congress wished SOD criteria to usurp the objectives of the CAP? If not, then what are the alternatives which truly represent CAP objectives?

This study is silent on such alternatives, because SOD was given the highest priority. Due to the new report on MPF by Water Resources Associates, Inc. it may be necessary to reopen the Stage III selection of Plans, because Stage III was heavily dependent on SOD.

---

"SRP Reregulation was eliminated because, with Cliff and New Roosevelt Dam as the CAWCS Dam safety solution. . .". Again, the agency is proud of the fact it saved itself from a State institutional problem in exchange for a Federal legal problem.

---

**5**

Page 12. B. Alternatives Analyzed in Detail

The 2nd sentence mentions "environmental groups". It should be noted only one such group was included.

---

**6**

Page 13

"His selection was based on the strong local support for Plan 6. . .". Throughout the impact statement the agency used the phrase "strong local support". Did the agency conduct a poll of the citizens in Central Arizona or did they fall prey to the desires of land speculators, who would support anything that would allow the flood plain to be developed, regardless of cost, economics, impacts or alternatives?

---

**7**

Page 13

"All plans, except the No Action Alternative, share common components." This is an admission that the 5 "alternative" plans are in fact variations on the same theme. These are not alternatives to a proposed action which would satisfy NEPA.

---

**8**

Page 14

"Lands would be acquired by the Federal government. . .". What effect does the Reagan Administration policy of privatization of Federal lands have on interagency transfer of lands? Should

**9**

lands be appraised before transfer and included as a cost of the new dam? This would result in a loss to the Federal government because of the ability to sell this land at a later date.

---

Page 16

2. Plan 8: No CAWCS Action

This section gives small capsulized descriptions of each of the alternatives and it shows the bias the agency has against the original CAP objectives, in terms of the Verde River:

Plan 8: No CAP components, with SOD to be developed at a later time.

Plan 1,3,6,7,2: Cliff Dam selected with SOD, CAP features appear to be only incidental.

**10**

The deletion of any alternative with structures for CAP purposes, with SOD to be developed at a later time (i.e., New/modified Roosevelt and New Waddell Dam with no structure on the Verde River), demonstrates that the CAWCS study has been primarily concerned with SOD and not the efficiency and economic viability of the CAP itself. It appears that any adjustment of SOD values will require such deleted alternatives to be re-evaluated.

---

Page 17

"Flood plain management is assumed. . .". This is the reason for any "strong local support" by cities, counties and others responsible for public safety and welfare. It is easier to ask the Federal government for hundreds of millions of dollars for dams, than to say "no", to development in the flood plain.

---

**11**

Page 28

5 (c)

It was found that Steward Mt. Dam would not withstand the maximum credible earthquake (MCE). Is this MCE an event which Arizona is reasonably expected to experience or is this an event

**12**

transposed to Arizona from another region? It should be noted Water Resources Associates, Inc. found that the agency transposed storms from Colorado to Arizona to develop a model for rainfall. Was this same transposition of events done for earthquakes?

---

Page 34

Plan 7

The dedication of 30,000 acre-feet of water to the Rio Salado Project, using recreation and fish and wildlife enhancement as a vehicle, is an obvious attempt to provide further subsidies to the flood plain developer. This scheme not only protects the land at no cost to the Rio Salado District, but provides free water as well.

---

13

Page 47

D. The Proposed Action-Plan 6

". . .because the plan meets project objectives. . ."

The single biggest philosophical theme in CAWCS is that the public is demanding flood protection at a level of 55,000 cfs. Public hearings showed the contrary and the most honest gauge of public opinion would be to see how the majority of citizens use the Salt River; they cross it on the way between their jobs and homes. The key was transportation and it was solved with bigger bridges. Flood control at the 55,000 cfs. level was included not for the "public" but for the same reason Alternative 7 was offered; the developer.

14

Public involvement programs ignored input which was found to be contrary to smaller flood flows and expanded beyond all proportions testimony supporting smaller flood plains. "The majority of speakers at three public meetings held in September 1981 favored Plans 6,7, and 8". The fact is that the majority came

to protest Orme Dam and Cliff Dam and little interest was shown for 6 or 7.

---

Page 48

"In October 1981, the CAWCS planning team participated in a "tradeoff" meeting. . .". It must have been a fascinating exercise as each alternative contained the Cliff and a new/enlarged Roosevelt Dam. As these structures were included in all "alternatives"; the result of any meeting, as to these components was never in doubt. The CAWCS had eliminated well in advance of this meeting any alternative against which Cliff Dam or Roosevelt Dam could be compared. The real decision was to exclude Orme Dam and Plan 2, already made safe by the Governor's Committee, and to turn down Rio Salado Project's efforts for free water.

---

**15**

Page 52

.7 figure for Riparian/Wetland Communities used in Table III-1 and explained on pg. 52-53 shows an obvious lack of appreciation of how rare the significant riparian communities are within that .7% figure.

**16**

The rest of the vegetation types listed with Riparian/Wetland Communities are either exotic vegetation or habitat degraded beyond recognition as a riparian area.

---

Page 70

e. Land Resources

In the section concerning vegetation communities, careful comparisons were done to show the relationship of each biotic community to the CAWCS area as a whole. It would be interesting to see what proportion the protected flood plain lands (Rio Salado) would add to the total land available for urban occupation. Perhaps the figure is so small that it would seem ridiculous to protect

**17**

developers in the river bed when so much other land is available.

Page 78

The Cliff Dam site was stated to be in a region of low seismicity. It appears that transposing storms from different regions to Arizona is permissible if it can justify structures for purposes of a hypothetical flood. However, transposing events (i.e. earthquakes), which may harm a proposed action are ignored. The concept of transposing events should be uniformly applied. Either reject transposing or apply it equally to all natural events which affect the structural integrity of Cliff Dam.

**18**

Page 80

Table III-9 and Table III-8 figures show that 930 acres of Cottonwood-Willow association are directly impacted by Cliff and Roosevelt Dams. Velvet Mesquite association is directly impacted by a loss of 2530 acres. What percentage are these losses to the total amount of Cottonwood-Willow association and Velvet Mesquite association is the CAWCS area? The single greatest impact to Wildlife diversity in the CAWCS area occurs in these two habitats, and yet the statement is silent on the percentage lost by Cliff and Roosevelt Dams to total acreage of this habitat.

**19**

What Tables III-8 and III-9 display is the total habitat lost by direct inundation from water in the reservoirs. The impacts to vegetative communities is not limited to direct inundation, but also include loss of communities due to flood plain modification. A reduction in the flood plain allows development of areas not developable prior to the construction of an upstream dam. Also, the loss of floods makes regeneration of new riparian communities difficult, if not impossible. The result on the Verde River is an adverse impact to riparian vegetation from the proposed Cliff Dam

**20**

to Granite Reef Dam. Since not all the land in that stretch of the river is Federal land, private developers will impact habitat as the flood plain is reduced. All of this area (Cliff Dam to Granite Reef Dam), is in the range of the Bald Eagle. The agency proudly presents the benefits to development of protected areas (i.e. the Rio Salado Project in metropolitan Phoenix), therefore it is only equitable that adverse impacts be noted to habitat and endangered species by the same reduction of the flood plain.

Page 116

"All aspects of project action were considered. . .".

Nothing is said about flood plain modification and its impacts to the environment. The modification in some instances may be more significant than direct inundation by the reservoir.

---

Page 118

### 3. Conceptual Mitigation

"These concepts are workable mitigation measures that could reduce or avoid impacts if implemented."

**21**

The interpretation of this statement makes any mitigation plan suspect to the point of mere fantasy, especially since there are no assurances Congress will fund these features. The sentence on pg. 119, "Residual impacts were computed as the quantitative difference between the unmitigated impact and the quantitative mitigation effort", means residue impacts do not exist. It is an obvious attempt to play games with the true impacts. To accept this argument of residue impacts to biological resources would require the agency to offer the "residue benefits" of flood plain development (i.e. Rio Salado Project). This would mean subtracting from the Rio Salado Project (introduction of Table IV-35) the

development which would have otherwise located in North Phoenix, North Scottsdale, Chandler or South Tempe. In other words, how much future development would the Rio Salado bring to the CAWCS are as a whole as compared with a future without Rio Salado? The difference is insignificant because the amount of capital and land available for development in the CAWCS area is such that the inevitable growth of the metropolitan area would occur in other valley locations.

The Rio Salado district admits it represents no new growth, just a redistribution of growth; therefore, the "residue benefits" are slight. The danger of arguing for "residue impacts" to biological resources is apparent.

---

Page 121

(2) Dam Operation Impacts

The impacts of scouring and loss of new seedings is discussed. However, private/public development of flood plain areas now occupied by riparian vegetation is omitted.

---

**22**

c. Conceptual Mitigation

These plans may be feasible, but implementation is doubtful considering the attitude of Congress for funding such features and the present administration's view on wildlife mitigation for other projects.

---

**23**

Page 125

(b) Plan 1,2,3,6, and 7

This section and the accompanying Table IV-3 are silent on loss of habitat due to flood plain modification by Cliff and Roosevelt Dams. These severe impacts are not even acknowledged in this section. Direct inundation of habitat accounts for only a small

**24**

percentage of the riparian habitat lost in Arizona. The loss of the majority of the habitat on the Colorado, Gila, Salt, and Verde Rivers has been the loss of the ability to regenerate due to modification of the flood plain.

---

Page 126 Table IV-3

**25**

Amusing.

---

Page 130-

**26**

No acknowledgement of the impact on riverine communities by flood plain modification.

---

Page 139

**27**

"Approximately ten miles of river will be excavated for fill material downstream of Horseshoe". There is no mention of the impact on riparian communities for the four miles downstream of Cliff Dam caused by the removal of fill.

"Bald Eagle productivity would not be compromised especially in Plan 2 through 6". What about flood plain modification from Cliff Dam to Granite Reef Dam? Additionally, does the agency know of any riparian rejuvenation attempts accomplished on old lake beds in the Southwest to support their conclusions concerning mitigations?

---

Page 165 c. Stream-Oriented Recreation

**28**

The agency has finally admitted that people do use flowing rivers in Arizona for recreation; however, their bias against it remains strong as it did the draft Orme Environmental Impact Statement. Consider this statement; "No changes in stream-oriented recreation resources are expected in the future without CAWCS action, . . .". The rise of tubing is a recent recreational phenomenon. Twenty years ago this stream-oriented activity was restricted

to a small number of people. The agency now projects this past-time will stabilize and restrict itself to the Salt River. Only two factors stop the utilization of the stretch of river between Horse-shoe Dam and Bartlett Lake: access and ignorance of the location. However, as Phoenix grows so will the demand for stream recreation and this area will be utilized.

Page 170

Where the agency wants spectacular growth in recreation they merely pick a number in the millions (always with 4 or 5 significant figures) to justify the proposed action. Conversely, the loss of future recreational activities are usually considered insignificant.

**29**

Page 198

e. Flood Damage Reduction

Everything in this section is controversial and distorted. The agency has developed its flood control plans to protect facilities never intended to be protected by Congress. This is obvious if the figures presented to Congress prior to the passage of the CAP are analyzed. In April, 1967 the Bureau provided a summary to Congress stating the total cost of the CAP at \$719,217,000. \$11,164,000 of this figure was allocated for flood control purposes (about 1 to 2% of the total). This figure represented flood control costs for all features; Orme, Hooker, Charleston and Buttes Dam for non-reimbursable flood control purposes. In 1968, many facilities such as bridges, public works, etc., were located in the flood plain. The agency still felt this figure was adequate and Congress relied on such information.

**30**

Many of the problems which existed in 1968 have been

solved by flood plain laws, relocations, and larger bridges. The agency now proposes flood control measures for the purposes of "intensification" at a cost and magnitude not conceived of either by the agency or Congress. The agency seems to enjoy usurping Congressional intent in all areas for the appeasement of special interests.

The agency apparently realizes that safety and general welfare arguments for flood control are diminished and now relies on the less noble arguments of land speculation to press for its proposed action, Plan 6 (see Table IV-35).

Page 213

**31**

The agency should train its personnel in the use of significant figures. It is obvious why there are so many numbers with four or more significant figures in the EIS; they are incorrectly presented. (see the table)

Page 215

The first paragraph is incredible and one wonders if the agency is that confident Congress will agree with them. If Congress does not agree, what is the fate of Plan 6?

b. Methodology

**32**

"The benefits associated with any output are the minimum amount that a rational person would be willing to pay to achieve that output". The question should be whether the Arizona legislature will pick up the cost of Plan 6 features (such as Cliff Dam) for development purposes knowing the availability of land in the CAWCS area? The answer is obvious: No. Then why should the Federal taxpayer assume this debt? Your reasonable person test is a creature which assumes the characteristics that are

assigned to him.

Two more realistic questions are: What would local interests fund if given a choice? and, What were the objectives of Congress at the time of CAP authorization? The "rational person" the agency has invented is always assumed to select a benefit/cost ratio of greater than 1. And when isn't a reclamation project assigned a positive ratio?

---

Page 221 (2) Direct and Indirect Impacts

The visual resources criteria which names one of the few remaining stretches of flowing river in the Sonoran life zone as "primarily average (V2) and undistinguished (V3)" is amusing.

---

**33**

Page 225

The most fascinating part of the impact statement is which impacts caused by flood plain modification are recognized and which are ignored. For the purposes of flood control, the agency readily claims the benefits in terms of intensification and items such as sand and gravel operations (p.229). Wildlife apparently isn't impacted and no mention is even made of loss of habitat below dams. Another interesting aberration deals with noise and the agency's lack of appreciation of its impacts.

---

**34**

On page 231 and page 233, the agency says without the proposed actions the airport may be restricted; however, on page 225, no significant noise factors are admitted. The dispute between Tempe and Phoenix over airport noise is now entering its second decade. The modification of the flood plain will allow Sky Harbor to expand (apparently a claimed benefit); however, the airport causes noise. The pattern is obvious in areas of noise, wildlife,

**35**

etc. Flood plain modification has no negative impacts; however, the development of sand and gravel, etc., has significant beneficial impacts. Is this consistent?

---

Page 235

**36**

"The effects of land use conversion impacts have been assessed as significant beneficial for Plan 6" and on the previous page "An insignificant effect value has been assigned to identified land conversion impact of Plan 2". The reason is that Plan 2 has a 157,000 cfs floodway and Plan 6 a 55,000 cfs floodway. The difference in acreage is 2,248 acres and 6,219 acres of land respectively.

The 157,000 cfs floodway greatly diminished the flood damages and provides over 2,000 acres of land, but this is considered insignificant. To whom is this fact insignificant? The Federal taxpayer or the Rio Salado promoters? And, who is the agency trying to appease? The agency's "rational person" must surely be a resident of Phoenix.

---

Page 271

**37**

". . .and a level of flood control for metropolitan Phoenix which would substantially reduce or eliminate major property damage and transportation disruptions". The truth is Plan 6 helps a Rio Salado Project for the maximum pleasure of its promoters. The public is assured freedom from "property damage and transportation disruptions" with less stringent measures (i.e. 157,000 cfs).

---

#### Appendix D

D-1

"The CAWCS alternatives were developed to meet the three objectives of the study: flood control. . .". The CAWCS

has decided the objective of flood control is to provide 55,000 cfs at the 100 year flow. They justify this flow using what appears to be three factors:

- (1) "reduction in the size of flood plain and resulting conversion of former flood plain lands to other (urban) uses," (intensification)
- (2) "reduction or elimination of flood hazard for people living in or adjacent to flood plains, and"
- (3) "reduction of property damage and transportation delays caused by flooding"

**38**

---

The facts show that (2) and (3) are greatly solved at a 157,000 cfs flow.

In comparing Table D-5 with the table on page D-7 the 157,000 cfs flood plain greatly reduces the amount of people impacted to about 500; however, the misuse of significant figures by the agency makes this only a gross approximation. The information is omitted as to the number of people impacted by the February 1980 flood, which was a larger flow than the 157,000 cfs. Isn't this the number which has a basis in fact and should be used for comparison purposes? Surely, it is not projected that more people are to move into these previously flooded areas (see Table D-3). If more people are projected to move into these areas because of local government's indifference to flood plain regulations, why does the agency feel itself compelled to aid these new residents?

**39**

---

It appears criteria number (2) is not a compelling factor to decrease flood plain beyond 157,000 cfs, when options exist to provide low cost flood protection for existing residents. Criteria

number (3), as presented on Table D-5 and Table D-6, shows that the 200 and 100 year flood controlled to 157,000 cfs (Plan 2 column) results in approximately 60 million dollar damages. When this figure is compared with the figure provided by the Army Corps of Engineers, Flood Damage Survey, February 1980 certain questions arise. Table 5 of that report lists the actual damages arising from a flow of approximately 170,000 cfs, which is larger than the CAWCS event of 157,000 cfs.

**40** That report lists damages on the Salt River to be approximately 41 million dollars and the Gila reporting 6.5 million dollars. For comparison purposes both the CAWCS study and the Corps' damage report are compatible, because they are both in 1980 dollars. The February 1980 flow resulted in 47.5 million dollars, when Agua Fria and transportation delays are subtracted. It also should be noted that a further subtraction should be made of the Gila damages of 6.5 million dollars, because of contribution by the Agua Fria River flow. The factor of how much to subtract was not given in the report and therefore was not done for comparison purposes below.

Therefore, the February 1980 flow of 170,000 cfs resulted in 47.5 million dollars in damages and the CAWCS study lists in Table D-6 for 157,000 cfs flow, 60 million dollars in damages. The single biggest damage of the 1980 event was damages to bridges and other public facilities, which since 1980 have been rebuilt for larger flows.

It would appear that many of the problems of the 1980

flood have been solved. Notice that the 8.3 million dollar damages in transportation delays experienced in 1980 are no longer projected for the future of ADOT. The 47.5 million damages would not be experienced today and would be reduced drastically if benefits from the new structures were subtracted (i.e. bridges and channelization of airport).

If this is true, then what does the 60 million dollars represent if the communities obey the 100 year flood plain regulation under Arizona State law? Projected damages of Table D-6 seem to have been greatly inflated, because it projects more damages than experienced by a larger 1980 flood. Does the agency seek to increase the benefits of flood control by hoping people disobey State law? If not, are CAWCS figures and damages caused by the February 1980 flood consistent and if inconsistent should not the inundation reduction benefits on page 218 be adjusted?

The last criteria (1) to be addressed is the speculation aspect of protected lands and it appears from Table D-2 and Table IV-35 this is the prime reason to reduce the flood plain. It is interesting that it is listed first in flood control benefits in Appendix D, and for obvious reasons.

Table D-2 of the draft EIS gives the additional land acreage made available by the reduction of the 100 year flood to 150,000 cfs and 50,000 cfs.

150,000 cfs yields 2,248 additional acres  
50,000 cfs yields 6,219 additional acres

The ratio for acres 'reclaimed' by flood plain reduction (50,000 cfs):

**41**

150,000 cfs) is approximately 2.76 to 1.

The report entitled Rio Salado Development Alternatives, January 24, 1983 prepared by Carr, Lynch Associates, Inc. displays a very different figure. Table C-7 displays the amount of land "rescued" for private development from Alma School Road to 35th Avenue:

200,000 cfs yields 1,230 additional acres  
55,000 cfs yields 2,165 additional acres

The ratio for acres reclaimed by the reduction of the 100 year flood (55,000 cfs: 200,000 cfs) is approximately 1.75 to 1.

The Rio Salado Report uses 200,000 cfs as an upper figure rather than the EIS figure of 150,000 cfs and, yet reports a smaller ratio of land "rescued". Because most of the land "rescued" outside of the Rio Salado District boundaries will be dedicated to rural and other lower value uses and, hence its economic impact slight, it is obvious most of the "intensification" benefits will flow from the Rio Salado District. Therefore, it would be helpful to know what acreage the agency claims "rescued" in the Rio Salado District Boundaries? Do the agency's figures differ from the Carr, Lynch Associates study, and if so, why? It is acknowledged that the Rio Salado plan does anticipate a channel to be built to protect some of the 1,230 acres in the 200,000 cfs; however, on page 54 of the report the cost for the armored channel is 130 million dollars for the 200,000 cfs flow and 128 million dollars for the grass channel of the 55,000 cfs flow. Again, in the section concerning riparian habitat the agency used the concept of actual impacts minus mitigation equal the "residual impacts", if the same argument is used

for flood control, what are the results? The result would be what land presently is unavailable for development minus possible local mitigation (i.e. channels and levees) equals the "residual benefits" that the Federal government may claim for further flood plain reduction. Why should the agency claim benefits for protecting land, which the Rio Salado District (a state authorized special district) may implement regardless of federal actions?

Responses to Comments  
Maricopa Audubon Society

- 69-1 Alternatives were formulated to meet the planning objectives including regulatory storage flood control, and safety of dams. All plans have positive net benefits. Your concerns regarding formulation are noted.
- 69-2 See response to General Comment #8.
- 69-3 The rationale for elimination of underground storage is discussed in the Stage II Report.
- 69-4 See response to Comment 1 and General Comment #9.
- 69-5 The rationale for elimination of SRP reregulation is detailed in the Stage III report.
- 69-6 Several environmental interests were represented on the Governor's Advisory Committee by Mr. Ben Avery, Ms. Eva Patten, and Dr. Robert Witzeman.
- 69-7 See response to Comment 11-2.
- 69-8 See response to General Comment #5.
- 69-9 Lands under private ownership will be acquired by the Federal Government. Those costs are included in the cost estimate. Lands required within the National Forest for Reclamation withdrawal, are currently not identified for privatization.
- 69-10 See response to Comment 1.
- 69-11 No new residents are projected within the 100-year floodway. Strict enforcement of flood plain regulations was assumed.
- 69-12 By definition, the Maximum Credible Earthquake (MCE) is "the largest earthquake that is capable of being produced from a source, structure, or region under the currently known tectonic framework". It is, therefore, a rational and believable event which can be supported by all known geologic and seismologic data. Because cases of major earthquakes with exactly the same tectonic conditions as those at a particular site are very rare, MCE analyses must rely on data extrapolated from earthquakes throughout the world.

From this, it can be stated that the MCE is neither an event which Arizona can reasonably expect to experience, nor an event transposed to Arizona from another region. Based on geologic data, major surface ruptures along the faults characteristic of Arizona's central mountains have been spaced many thousands of years apart, the most recent of which appears to have occurred during late Pleistocene time. Of lesser magnitude, the most recent earthquake in the area was the 1976 Prescott earthquake with a magnitude of 5.2 on the Richter scale. The MCE's for the Salt River Project dams

are, therefore, interpretive events which could occur in the area, but are not routinely experienced.

It should be noted that the improper transposition of storms has alleged by Water Resources Associates (WRA) was a false assumption on their part. By letter to Arizona Public Service dated September 1, 1983, WRA acknowledges this error.

- 69-13 The primary purpose of the proposed provision of 30,000 acre-feet of water to Rio Salado was for wildlife mitigation and enhancement. No recreational enhancement was proposed for Plan 7. Recreational losses will be mitigated through replacement, which can be done on-site. Recreational enhancement is also possible on-site. It should be noted that the proposed "enhancement" at Rio Salado is not of the same quality as that available closer to the site impacts. The identification of 30,000 acre-feet was an attempt to identify potential enhancement measures.
- 69-14 See response to comment 11-2.
- 69-15 The decision process for selection of the agency proposed action is detailed in the Stage III Report.
- 69-16 Methodology for determining vegetation types is outlined in the Stage III Methodology for Environmental Quality Assessment.
- 69-17 See response to General Comment #8.
- 69-18 Uniformity in the application of storm events and seismic events is not an issue of whether both or either are transposed events from other areas. Each of the Salt River Project dams lies upstream of the Phoenix area, a major urban center. Failure of any of these dams, whether due to floods or earthquakes, could have catastrophic consequences such as loss of lives and extensive property damage. In such a setting, uniformity is applied by selecting maximum flood and seismic occurrences as design criteria for these structures. The procedures for determining the probable maximum flood (an event controlled by climatological and topographical characteristics of an area), are far different from those for selecting the MCE (an event controlled by the geologic and tectonic characteristics of an area).
- 69-19 The acreages were developed for the purposes of comparing alternatives as is detailed in the Stage III Environmental Quality Assessment Methodology.
- 69-20 Development within the floodplain would occur below the confluence of the Salt and Verde Rivers because land upstream is not in private ownership. Riparian habitat on the Salt River through the Phoenix metropolitan area is practically non-existent. That present is of minimal use to wildlife, therefore, impacts to riparian habitat is extremely slight.
- 69-21 Commitments to mitigation for Plan 6 are detailed in Section IV.C.

- 69-22 See response to Comment 20.
- 69-23 See response to Comment 21.
- 69-24 See response to Comment 21.
- 69-25 Your comment is noted.
- 69-26 See response to Comment 20.
- 69-27 Impacts due to borrow areas were considered in the determination of impacts within a reservoir site area as is detailed in the Stage III Environmental Quality Assessment Methodology.
- 69-28 The stream miles available for stream oriented recreational use will not change. The statement goes on to identify increased recreational use that will take place without a CAWCS action. The specific activity of tubing is addressed in the last sentence of the paragraph. No prediction of tubing stabilizing and "restricting itself to the Salt River" is made or implied. Quite the contrary. The support documentation for the recreational material quite clearly shows the growth and interest in tubing, especially on the Verde River.
- 69-29 Throughout the study effort the identification of recreational needs and demand was accomplished by accepted needs analysis procedures. This effort consistently produced large numbers, mainly because of the numbers of people in the recreation market area and their demand for outdoor recreation. The numbers reported are verifiable. Minor loss of future recreational potentials/activities will result. All existing facilities will be replaced and many new opportunities will be created. A unique situation exists in that Plan 6 deals with existing reservoir resources and thus loss of future recreational resources is replaceable and insignificant.
- 69-30 See response to General Comment #8.
- 69-31 Your comment is noted.
- 69-32 The "rational person" referenced is economic jargon for a decision process which internalizes all costs. This section has been revised to clarify the confusion.
- 69-33 Your comment is noted.
- 69-34 See response to Comment 20.
- 69-35 See response to Comment 20.
- 69-36 Criteria for assigning effects are detailed in the Stage III Environmental Quality Assessment Methodology.
- 69-37 Your comment is noted.

- 69-38 Your comment is noted.
- 69-39 See response to Comment 11.
- 69-40 The Corps of Engineers Flood Damage Survey, February 1980 did not include damages to special structures, primarily the dams on the Salt and Verde Rivers. The lack of damage to these structures is a benefit of providing flood control.
- 69-41 See response to General Comment #8.

# 70

#70

**Arizona Public Service Company**  
P.O. BOX 21611 • PHOENIX, ARIZONA 85036

KEITH TURLEY  
CHAIRMAN AND CHIEF EXECUTIVE OFFICER

OFFICIAL FILE COPY		
RECEIVED A	JUL 14 1983	
Action	750	
Action Taken	Initials	
Date	Initial	To
		100
		750
		742
File		

July 12, 1983

Mr. N. W. Plummer  
Regional Director  
Bureau of Reclamation  
Lower Colorado Region  
P. O. Box 427  
Boulder City, Nevada 89005

Dear Bill:

Recently the firm of Water Resources Associates, Inc. completed an independent analysis of the calculations of Probable Maximum Flood (Inflow Design Flood) developed by the Bureau of Reclamation and the Army Corps of Engineers. As you may recall, the Bureau and Corps did their work as part of the Central Arizona Water Control Study (CAWCS).

Attached for your information and review is the study and a letter to Secretary of the Interior James Watt on this matter. I trust these materials will be of interest to you. If you should have questions, please let me know.

Sincerely,  
*Keith Turley*

KT/wpc  
Attachment

Arizona Public Service Company

P.O. BOX 21666 • PHOENIX, ARIZONA 85036

KEITH TURLEY  
CHAIRMAN AND CHIEF EXECUTIVE OFFICER

July 7, 1983

The Honorable James G. Watt  
Secretary of the Interior  
Department of the Interior  
Washington, DC 20240

Dear Mr. Secretary:

As you know, the Carter Administration's Central Arizona Water Control Study (CAWCS) was created in 1978 to review alternatives to Orme Dam, a key component of the Central Arizona Project. Orme Dam, at the confluence of the Salt and Verde Rivers, was designed to provide CAP regulatory storage and flood control for the Salt River Valley.

During the course of the CAWCS study, the Bureau of Reclamation and the Army Corps of Engineers dramatically increased the values for the Probable Maximum Flood (Inflow Design Flood) which became the basis for developing alternatives to Orme Dam. The peak flow values into the Salt River at Roosevelt Reservoir and the Verde River at Horseshoe Reservoir were several times higher than the original Bureau figures. As a result, the Federal agencies' calculations, based on new assumptions, increased the hypothetical peak flow at the confluence of the Salt and Verde Rivers from 336,000 cfs to 850,000 cfs, an increase of 153%.

This dramatically higher peak flow had far-reaching impacts on the CAWCS conclusions: it resulted in the determination that a confluence structure was not economically feasible, and it provided the basis for the conclusion that dams on the Salt-Verde watersheds were unsafe.

As a member of the Governor's CAP Advisory Board, which was created to recommend alternatives to Orme Dam, I questioned the accuracy of such enormously increased flood levels at the time they were introduced by the Bureau and the Corps. While I was not impressed with the agencies' explanation for this increase, I reluctantly accepted the higher calculations and concurred in the selection of Plan 6 as a suitable alternative, for your consideration.

However, more recently, during Senate hearings on Safety of Dams legislation in 1982, it was reported that the possible failure of upstream dams would result in a 10-foot wall of water which would inundate the homes and businesses of the Salt River Valley. In

the event of such a catastrophe, one assumes there would be ample warning so that all citizens could be evacuated safely. However, with several hundred million dollars of APS facilities inundated by such massive flooding, we would not be able to serve our customers in Central Arizona safely and reliably. This apparent potential catastrophe dictated that APS undertake independent studies to assure that Plan 6 was the appropriate answer to what appeared to be a serious problem.

For that reason, APS engaged Water Resources Associates, Inc. to evaluate the USBR and USCE conclusions reached in the Central Arizona Water Control Study.

The WRA, Inc. study finds that the USBR and USCE's conclusions grossly overstate the potential flood conditions. The Federal agencies' predictions of precipitation amounts, runoff conditions, and the resulting flooding, produce a potential flood that is about 50% greater than what is reasonable, according to WRA.

In its report, WRA rejects outright certain USBR or USCE assumptions, including the precipitation estimate of hypothetical storms. The study says the transfer of summer storms to winter conditions is meteorologically inconsistent, and movement of Colorado and Utah storms to the Salt and Verde watersheds produces an excessive value for possible precipitation.

As a result of the WRA, Inc. analysis, the only independent study presented to date, I conclude that:

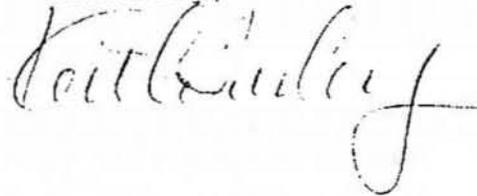
- (1) selection of Plan 6 by the Governor's Advisory Board and now before you for approval, is inappropriate due to invalid assumptions and data;
- (2) Safety of Dams problems do not appear as severe as the CAWCS concluded;
- (3) a confluence dam once again appears to be an economically and technically viable solution for CAP regulatory storage and desperately needed flood control for the Salt River Valley.
- (4) completion of a confluence structure for regulatory storage and flood control features of the CAP could be accomplished in a far shorter time period than the proposed Plan 6 construction of two new dams and repairs to two others.

I urge you to review our enclosed report and to conduct further investigations before large expenditures of federal and/or state and local funds are committed to alternatives that are clearly

July 7, 1983

not the best for CAP regulatory storage and flood control. We would be pleased to review the findings of this report with your staff if provided the opportunity.

Sincerely,

A handwritten signature in cursive script, appearing to read "Keith Turley". The signature is written in dark ink and is positioned below the typed word "Sincerely,".

KTURLEY:ch

Enclosure

Responses to Comments  
Arizona Public Service Company

70-1 See response to General Comment #9.

U.S. Department  
of Transportation

United States  
Coast Guard



71

Commandant  
United States Coast Guard

Washington, DC 20593  
Staff Symbol: G-WP/11  
Phone: (202) 426-9585

1505

#71

02 AUG 1983

Mr. Stephen F. Specht  
Acting Director, Office of Environmental Affairs  
U.S. Department of the Interior  
Bureau of Reclamation  
Washington, D. C. 20240

Dear Mr. Specht:

The concerned operating administrations and staff of the Department of Transportation have reviewed the draft environmental statement on the Regulatory Storage Division, Central Arizona Project.

The Federal Highway Administration offered the following comment:

"1. On page 278, 6H(1) needs a discussion on compensation for the relocation of State Route 188 at the new or reconstructed Roosevelt Dam and on how traffic would be accommodated on existing SR 188 if the dam reconstruction alternative is selected."

The opportunity to review the Central Arizona Project is appreciated:

Sincerely,

A handwritten signature in cursive script that reads "W. R. Riedel".

W. R. RIEDEL

Chief, Planning, Coordination  
and Analysis Staff

By direction of the Commandant

Responses to Comments  
U.S. Department of Transportation

71-1 Costs of relocation of State Route 188 are considered a project cost and are included in the cost estimates. As more detailed designs proceed, Reclamation is working with the Arizona Department of Transportation to assure that travel on SR 188 will proceed smoothly during the construction period.

72

#72

R.H. or Starr Johnson  
11633 N. 64th Street  
Scottsdale, Arizona 85254

OFFICIAL FILE COPY - APD	
RECEIVED	AUG 12 1983
Action	
Action Taken	
Date	700
File	

August 1983  
11875 N 6457  
Scottsdale, AZ  
85254

Project Manager  
Bureau of Reclamation  
Valley Center Bldg Suite 2200  
Phoenix, AZ

Dear Sir:

The public hearing on the Draft Impact Statement on alternatives to some Dam was very informative. It was very obvious that the majority were against Cliff Dam and the arguments for not undertaking this very expensive project appear valid. It seems strange that no viable alternative was presented without Cliff Dam included except do nothing. This reminds one of the phrasing of questions in a public poll to get the answer that one wants.

As an engineer for one of the major firms in the Valley, I am presently under contract to the US Army Corps of Engineers to develop some special equipment. In my capacity as Program Development Manager I recently was at the US Army Waterways Experimental Station in Vicksburg Miss. This

122

facility was originally set up after a great flood in 1912. A large scale model of the river was built to study the best way to prevent a recurrence. After the project was successfully completed, instead of disbanding the activity, other projects were looked for and the situation is bigger than ever. They even constructed tunnels for power generation at Niagara Falls but only at night when people can not see what is going on. Cliff Dam reminds one of a Bureau that is looking around for something to do.

---

another example along this line was observed at a US Army Corps of Engineers laboratory in Dover, NJ. One of the Civil Servants had so much to do that he bought rolls of pennys at the bank, took them to work and sorted through them to find any unusual ones. What we need is fewer Bureaus and no more dams! All the needed dams were built a long time ago. I favor Plan 8.

---

Sincerely,  
RH Johnson

Responses to Comments  
R.H. Johnson

- 72-1 See response to General Comment #5.
- 72-2 See response to General Comment #6.
- 72-3 See response to General Comment #4.



Responses to Comments  
Arizona B.A.S.S. State Federation

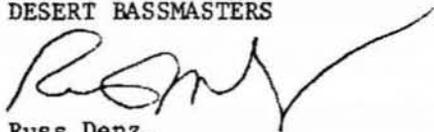
73-1 See response to Comment 3-38.



Mr. Hallenback  
Page Two

Please find attached 13 signatures of our members which support our position.

Sincerely,  
DESERT BASSMASTERS

A handwritten signature in black ink, appearing to read "Russ Denz", with a large, sweeping checkmark-like flourish extending from the end of the name.

Russ Denz,  
President

RD/cj  
attachment

NAME	ADDRESS	CITY	STATE	ZIP
Tom [unclear]	3859 W. Fremont Dr.	Tempe	85282	
Bob [unclear]	5049 E. [unclear]	Phoenix	85032	
Louis M. Bidar	3302 E. Cuyx	Phoenix, Ar.	85028	
Ray Schunabel	5827 N 45th	Glendale	85103	
Ed Karne	9316 W San Miguel	Tolleson	85353	
Edgar R. Jesse	107 W Granada	Phoenix	85003	
Bill [unclear]	7201 W [unclear]	Phoenix	85033	
Tom [unclear]	6120 W [unclear]	Phoenix	85033	
Al Moore	Box 514	Phoenix	85326	
Ken Shaving	6502 W. Mariposa	Phx.	85033	
Jerry [unclear]	4331 W. Ocotillo	Glen.	85301	
Don Hamelton	9435 N. 15 PLACE	Phx.	85020	
Monroe [unclear]	4201 N 18 PL	Phx	249949	

Rec'd Aug 24, 1983  
M. Webb

Mr. Hallenback  
Page Two

Please find attached 19 signatures of our members which support our position.

Sincerely,  
WESTSIDE BASSMASTER OF PHOENIX

~~CHARLES COLLIN~~  
~~Kenneth Kennedy~~  
✓ President

KK/cj  
attachments

NAME

ADDRESS

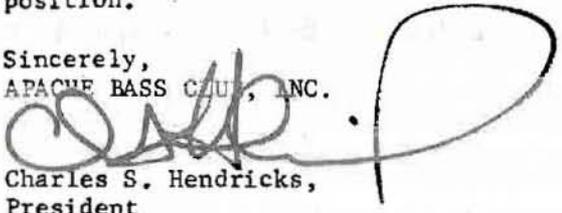
Kenneth T. Kennedy	4838 W. TUCKEY LN. Glendale.
Jerry J. Jassin	4333 W. ECHO LN. Glendale, AZ 85301.
Fred A. Ingemal	6808 W. ROGET AVE. Peoria. Az. 85345
Jack Kline	5552 W. CATAVAN Glendale Az. 85306
Jasper Morris	14041 N 184 <sup>th</sup> Ave Waddell Ariz 85355
W. J. [unclear]	2034 W CHOLLA PHX AZ 85029
Jack Jents	7614 N 42 LN PHX AZ 85021
William W. Pender	1514 W CAMPBELL BELLO D PHOENIX AZ 85023
Billy [unclear]	2532 N 36 <sup>th</sup> DR PHX, AZ 85009
John [unclear]	3471 W [unclear] PHX, AZ. 85001
Carl E. Pugh	2440 E 4000A PHX AZ 85048
John A. Coffey	3113 N 89 <sup>th</sup> AVE PHX AZ 85037
Mike Wilson	7221 W 25 <sup>th</sup> LN. PHX AZ 85021
Charles E. [unclear]	2233 W EARL DR. PHX AZ 85015
Warren [unclear]	15417 N. 62 <sup>ND</sup> DR. GLEN AZ. 85306
Robert [unclear]	15839 N. 60 <sup>th</sup> DR GLEN. AZ 85306
Math [unclear]	4609 W. FRIER DR Glendale AZ 85301
William A. Mahoney	1721 W. TOPEKA DR PHOENIX AZ 85027
L.P. Swindle	5028 W. TUCKEY LN. GLENDALE, AZ. 85301

Rec'd 9/14

Mr. Hallenback  
Page Two

Please find attached 15 signatures of our members which support our position.

Sincerely,  
APACHE BASS CLUB, INC.

  
Charles S. Hendricks,  
President

CH/cj  
attachments

NAME

ADDRESS

Arthur W. Chambers 14254 DEL CAMBRE FOUNTAIN HILLS 85264  
Jack A. Bowers 1626 W. Huntington Dr. Tempe 85282  
John M. Longrey 2033 N 64 ST Mesa 85205  
Donald C. Smith 4021 N. 55th Ave. Phoenix 85018  
Chris Verman 240. N. 100th WAY MESA 85207  
Charles Ingram 752 S Pasadena MESA 85202  
James F. & Virginia 8718 18248 FTY HILLS 85268  
John Naltipka 111 E. CEDAR PAYSON AZ 85541  
JERRY HAYNES 1207 N. APACHE Ln. Payson AZ 85541  
Jane Haynes 1207 N. Apache Ln. Payson AZ  
Jeffery Peckler Box 17078, Fountain Hills AZ 85268  
Jeffery Peckler 3234 E. PERSHING PHOENIX, AZ  
Jeffery Peckler 3234 E PERSHING PHOENIX, AZ  
William H. Longrey 2033 E Rustic Mesa, Az.  
Bill Longrey 3524 W 56 ST PHO. AZ 85018

rec'd 9/16

Mr. Hallenback  
Page Two

Please find attached 24 signatures of our members which support our position.

Sincerely,  
ROOSTER TAILS WEST-HYDRASPORTS

Buck Connors,  
President

BC/cj  
attachments

OFFICIAL FILE COPY - APO	
RECEIVED	SEP 13 1983
7/13	700 SMH
	730
	712
File	

Original to LC-157A

NAME

ADDRESS

Ranch Connor 8219 W. Roma Dr., PHX, AZ 85033  
 Dan Gray 525 N. Commanche Dr Chandler AZ 85224  
 John Baker 1236 N. Black Canyon #227 PHX  
 Sam Chatterberg 3368 E CLAIR DR. PHX AZ 85032  
 Vince Indare 1880 E. GENEVA DR. 85282  
 Duran Gomez 1861 E. 1<sup>ST</sup> ST MESA AZ 85203  
 Law Stoddy 3419 N 45<sup>TH</sup> Phoenix AZ 85018  
 Kip L. HUNSAKER 141 E. JUNE MESA, AZ. 85201  
 GARY M. DUERR 1831 W. OBISPO MESA, AZ. 85202  
 Mike Just 8701 E. Starlight Way Scotts Ariz 85253  
 ART DEAN 2529 S. BALA TEMPE, AZ 85282  
 Paul Wilson 12644 N. 26 Dr. Phoenix, AZ. 85029  
 Norman H. Ornoski 2401 W. Southern Box 106 TEMPE ARIZ. 85282  
 - John A. Schlink 4212 E. Cheery Lynn Rd. Phoenix, Ariz 85018  
 Bud Mallin 4023 N 51<sup>ST</sup> #8 PHX AZ 85008  
 STEVE BAUGH 614 MENBIL PHX AZ 85040  
 FRANK LISAK 5623 W. BECK LA. GLENDALE AZ 85306  
 LAMONT SKOVSON 728 N. RIATA GILBERT, AZ 85234  
 GARY WEISSHA 8638 E SAN MIGUEL Scotts. 85253  
 Kenneth Rubbs RT 1 Box 1760 CASA GRANDE  
 Pete Anderson 8237 N 97<sup>TH</sup> ST PHOENIX ARIZONA 85020  
 ARIZONA COMM. FISH HARVESTERS INC.  
 - Dick KAUFMAN 1214 E Becker Ln PHOENIX AZ 85020  
 Floyd A. Press 2283 E. Broadway, Apache Junction, AZ. 85220  
 Carol E. Caldwell 2283 E. Broadway, Apache Junction, AZ. 85220

Mr. Hallenback  
Page Two

Please find attached 2 (pages) signatures of our members which support our position.

Sincerely,  
OLD PUEBLO BASSMASTERS

Jerry Lapin,  
President

JL/cj  
attachments

*Jerry Lapin*

①

NAME	ADDRESS	CITY	ZIP
Beverly Jones	5061 W Tanager	Tucson	85741
Klee Fields	11800 No. Jai	Tucson	85704
Gerald Lopez	8875 BLUEFIELD		85710
Phil Dering	13217 N. Sunspot Pl		85715
James Foster	4167 E Flower		85712
Madness Maxwell	1141 W Calle Concordia	Tucson	85704
John E. Lawrence	4458 La Jolla Circle	Tucson	85711
Ruff Stalings	5757 E 55th St	Tucson	85711
Alexey	1204 S. TURQUISE VISTA	Tucson	85710
Jim D...	1805 S. D. & Park Dr	Tucson	85712
Richard F. Johnson	3735 S. S. Swift	Tucson	85730
Richard DeShong	3626 S. MONTREAL PL	TUCSON	85730
James J. Applegate	6211 W. Tranter End	TUCSON	85745
Howard Gray	7625 E 38th St	Tucson	85730
Bill Dawson	6862 W. Sunset	Tuc.	85743

NAME

Alfred A. Burlini 5701 E. GLENN #106 TUCSON 85712

Vincent R Nicita 8110 E Rockgate Rd Tucson 85715

Henry J. Klamm 6626 A. MAVERICK CR TUCSON 85708

James L Davis 3445 E 5<sup>th</sup> ST Tucson 85716

Ron Blauvelt 620 Avenida Pinos Tucson 85748

Bob Hodges 7351 E. Speedway #31-A Tucson, 85710

Mike Cochran 6618 Calle Betelgeuse Tucson 85210

Mike Klingler 4759 S Apple Tree DR 85710

Thomas M. Burk 7620 E. 42ND TUCSON

Tom Weaver 9325 E. 29<sup>th</sup> TUCSON 85710

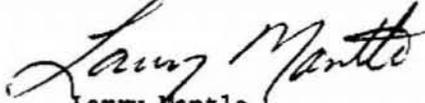
Buddy Wade-Josta 4167 E. Lower Tucson, 85712

Buck J. Pomer 1425 E RONS Tucson 85706

Mr. Hallenback  
Page Two

Please find attached 39 signatures of our members which support our position.

Sincerely,  
ARIZONA BASS CLUB

  
Larry Mantle,  
President

LM/cj  
attachment

NAME	ADDRESS
Kenny G. Gifford	1805 W Charleston
Carly J. Holt	9022 N. 56 AVE Glendale
T. Cleve Preston	1149 W. Laird, Tempe
Charles L. Brian	915 E. Ruth, Phx
Walter B. Pickman	4848 W. PARADISE DR.
Lynn A. Ford	7639 S. Kenwood Ln. Tempe
Joseph D. Randall	838 E. DRAKE TEMPE
P. Marshall	3201 W BECKER LN. PHX
Ed D. Darrow	7731 W ELM
Don Conkey	7613 W Demonski Ave Phoenix
David Pence	4841 N 81 <sup>st</sup> Dr Phx
Jerry Wilson	4065 N 49 <sup>th</sup> DR Glendale AZ
C. E. Smith	3932 E Pershing Phx Az 85032
E. Wood	3454 N 36 <sup>th</sup> PHX AZ 85022
James M. Swain	5243 W. El Cominito Dr Glendale AZ 85032
Richard A. Gussman	626 Beal Flagstaff, Ariz.

Mike Hamilton	6916 W Georgia	Wenatchee	Home
Bill & Joanne	3551 Soughton	BB Seattle	WA
Bill & Joanne	Box 1896	Camp Creek	WA 85551
Bill & Joanne	4600 S 10th	Seattle	WA
Bill & Joanne	7571 E 1st	Seattle	WA
Bill & Joanne	5170 East Lake	Wenatchee	WA
Bill & Joanne	4500 S 10th	Seattle	WA
Bill & Joanne	4900 S 10th	Seattle	WA
Bill & Joanne	4500 S 10th	Seattle	WA
Bill & Joanne	2119 S 10th	Seattle	WA
Bill & Joanne	1800 S 10th	Seattle	WA
Bill & Joanne	11814 UNCLE MARY DR.	PHX	85044
Bill & Joanne	1543 W. Penning	Phx.	85029
David K. Hansen	5529 N 63 AVE	Chandler	85201
John Kocender	2101 W Villa Vista	Phx	85023
James Kocender	6175 W. East St	Phx	85033
Charlie Kocender	3011 W Montebello	Phx	85017

NAME

ADDRESS

1001 - 10000	18219 No 31st Lane Phx
Douglas W. Hoff	3315 W. BETHANNY H. - C. PHX
1001 - 10000	163 - 5th Ave. Phoenix
Robert A. Phillips	602 W. Main Street Phoenix
Larry Monte	4015 W. Altadena Phx 85029

NAME

ADDRESS

FRANK LISAK	5123 W. BEEK LA GLENDALE AZ
Richard Rojas	5337 W. Encanto Blvd PHX AZ
Franky Bono	1608 N. 58 <sup>th</sup> AVE PHX, AZ
DAN CAMPBELL	308 W. TARO PHX AZ
Lewis E Southard	1720 E Jarvis Mesa AZ
FRANK T. FINE	3244 E. CALIFORNIA AVE PHX AZ
ELMER STUBBS	728 N. 10 <sup>th</sup> W. BENT, AZ
MIKE NEWMAN	14426 N 36 <sup>th</sup> AVE PHOENIX AZ 85023
Carol E Caldwell	2283 E Broadway Apache Jct, AZ 85200
Frank A. Jones	5289 E. BROADWAY APT 206, JCT, AZ 85200
Mike Jones	928 E STELLA LN #22 PHX, AZ 85014
Reginald Barafant	6902 E. CYPRESS SCOTTSDALE AZ 85257
Robert Bankhart	6215 S. 4 <sup>th</sup> AVE PHX AZ 85041
MICHAEL BRADHART	2012 S. GRANDAL # H 85282
Edward L. Lempert	201 <sup>st</sup> HERMOSA # 102 Tempe 85222
Randall S. Mackay	1317 E Westchaste Tempe 85283
MICHAEL R. CAMMELL	5226 W. CORTAZ GLENDALE AZ 85304

Responses to Comments  
Arizona B.A.S.S. State Federation

- 74-1 See response to General Comment #7.
- 74-2 See response to Comment 3-4.
- 74-3 Commitments to mitigation for Plan 6 are detailed in Section IV.C.
- 74-4 Section IV.C.1. addresses the commitments to each of the measures listed.