

## COMMENT LETTER

## RESPONSES

SEP. 8. 2000 3:38PM MWD

NO. 236 P. 2

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

September 8, 2000

Mr. Robert W. Johnson  
Regional Director  
Lower Colorado Region  
c/o Ms. Jayne Harkins, BC00-4600  
U.S. Bureau of Reclamation  
P.O. Box 61470  
Boulder City, Nevada 89006-1470

VIA FACSIMILE

Dear Mr. Johnson:

Comments on Colorado River Interim Surplus Criteria Draft Environmental Impact Statement

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity provided by the U.S. Bureau of Reclamation (Reclamation) to comment on the Colorado River Interim Surplus Criteria Draft Environmental Impact Statement (DEIS). Metropolitan has reviewed the DEIS in conjunction with the information submitted on the DEIS which was published in the Federal Register on August 8, 2000 on pages 48531 to 48538 (information), and the August 14, 2000 memorandum making available Attachment I for the DEIS.

Metropolitan notes that Reclamation has made a preliminary review of information submitted on the DEIS, entitled, "Interim Surplus Guidelines—Working Draft", which is the product of significant effort on the part of the representatives of the Governors of the Colorado River Basin States and has made a preliminary determination that such criteria are within the range of alternatives and impacts analyzed in the DEIS. Metropolitan encourages Reclamation to complete the final evaluation of the information, and supports the presentation of the results of that final evaluation in the Final Environmental Impact Statement (FEIS). Metropolitan supports the designation of the "Interim Surplus Guidelines—Working Draft" as the preferred alternative in the FEIS.

One of the comments made at the August 24 public hearing in Phoenix, Arizona indicated that Reclamation had ample authority to participate in a dialogue on the "Interim Surplus Guidelines—Working Draft" during the remainder of the NEPA process. As a potentially affected public agency, Metropolitan requests the opportunity to be invited to participate in any such dialogue.

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

2: Reclamation appreciates the willingness of state and local agency representatives to participate in a dialogue on the interim surplus criteria during the NEPA process. This has been of assistance in compiling water demand projections and other operational aspects for the analysis.

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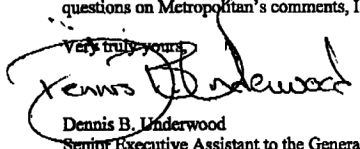
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THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Robert W. Johnson, Regional Director  
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Enclosed for your consideration are additional comments on the DEIS. Should you have any questions on Metropolitan's comments, I may be reached at (213) 217-6588.

Very truly yours,

  
Dennis B. Underwood  
Senior Executive Assistant to the General Manager

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Enclosure

## COMMENT LETTER

## RESPONSES

SEP. 8, 2000 3:39PM MWD

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**Additional Comments on  
Colorado River Interim Surplus Criteria Draft Environmental Impact Statement**

The following comments are offered for consideration by the Bureau of Reclamation (Reclamation) for inclusion in the Final Environmental Impact Statement:

- 3 | 1. Insert the word "normal" before the word "apportionment" as California has not been diverting more than its normal and surplus apportionment combined. (Page 1-3, paragraph 4, line 1)
- 4 | 2. Insert the phrase "beneficial consumptive use of" before the word "water" as Article III of the Colorado River Compact apportioned the beneficial consumptive use of water between the Upper and Lower basins. (Page 1-8, point 1, line 1)
- 5 | 3. Insert the phrase "authorized the Lower Division states to enter into an agreement apportioning the", and delete the word "apportioned" before the word "water" to more precisely state what was authorized by the Boulder Canyon Project Act. After the word "water" delete the phrase "among the Lower Division States". (Page 1-8, point 2, lines 2-3)
- 6 | 4. Insert the word "Protection" after the word "Floodway" to more precisely reference the short title of Public Law 99-450, the Colorado River Floodway Protection Act. (Page 1-20, paragraph 5, line 1) Insert the phrase "from below Davis Dam to the Southerly International Boundary between the United States and Mexico" following the word "greater" to specify the location of the floodway. (Page 1-20, paragraph 5, line 3)
- 7 | 5. Delete the sentence "The Colorado River Floodway Act requires that the minimum flood release from Hoover Dam can be no less than 40,000 cfs" as Metropolitan's review of Public Law 99-450 did not reveal this requirement. (Page 1-20, paragraph 5, lines 3-5)
- 8 | 6. Is the Lower Basin apportionment referenced, the Lower Basin normal apportionment or the Lower Basin normal and surplus apportionment? (Page 1-20, paragraph 1, line 5)
- 9 | 7. It is stated that "Elevation 1083 feet msl is the minimum water level for power generation at the Hoover Powerplant based on its existing turbine configuration." (Page 3.3-10, Section 3.3.3.4, lines 6-8) In Reclamation, River Operations Team, Boulder City, Nevada's, "CRSSEZ Annual Colorado River System Simulation Model, Overview and Users Manual", Revised May 1998, it is stated that "If mavgelev is less than 1050 feet then Hoover energy is zero." where mavgelev is Mead average elevation for the year. (Page 13, paragraph 5, lines 8-9) In the Draft Environmental Impact Statement (DEIS), it is stated "The minimum water surface elevation for efficient power generation is 1083 feet." (Page 3.3-23, paragraph 1, lines 4-5) Please clarify whether the word

-1-

3: Comment noted, the change has been made.

4: The suggested edit was included in the FEIS.

5: The suggested edit was included in the FEIS.

6: Your comment is noted. This paragraph has been deleted. Section 3.6.4.1 has more information regarding Public Law 99-450.

7: Your comment is noted. This paragraph has been deleted.

8: Reclamation assumes this comment is referring to page 1-22, paragraph 1, line 5 of the DEIS. The sentence has been changed.

9: The fifth sentence of the first paragraph in Section 3.3.3.4 has been changed to read as follows: "Elevation 1083 feet msl is the minimum water level for effective power generation at the Hoover Powerplant based on its existing turbine configuration." A quantitative definition for "effective" as it is used in connection with power generation has been added to Section 3.10.2.1.