

## COMMENT LETTER

## RESPONSES

09/11/2000 10:12

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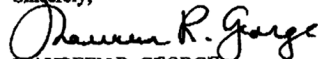
LHC PD CTY ATTY

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Comments on the Draft Environmental Impact Statement (EIS) regarding Colorado River Interim Surplus Criteria, Colorado River Basin  
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- 6 The only acceptable reparation is wet water, available in the shortage year when needed, up to the amount that would have been available but for any water diverted by California as a result of these interim guidelines.
- 7 The proposed interim guidelines provide for no reparation to Arizona for continued use of water beyond its allocation when such water will only be "available" if Arizona either declines to take its apportionment in order to assist California or, in the alternative, declines to take the surplus to which it is entitled. We are concerned that either of these actions would be a detriment to water users in Arizona, particularly those outside the CAP.
- 8 The report fails to address in any detail the practical bottom line, i.e., water use is going to continue to increase astronomically at the rate California is growing. There is little or no probability that water use will actually decrease to the 4.4 number without significant enforceable sanctions which certainly are not present in the proposed interim guidelines.
- 9 The report seems to indicate while there may be an increase in demand on the Colorado River, for example in Mohave and Yuma counties, such demand is many years out. This is not true. The Arizona Water Bank's recent study indicated Lake Havasu City, for example, will run out of water prior to the proposed expiration of these interim surplus guidelines. The Draft EIS makes no effort whatsoever to address the concerns of fourth priority mainstream river users as opposed to those in CAP.
- 10 The report states the Bank's primary purpose is to firm CAP supplies. This is not true. It has an equal obligation to firm the supplies of river communities. Our concern is that obligation would not be met if these interim surplus criteria are adopted.
- 11 The Draft EIS fails to take into consideration the cumulative impact on Colorado River main stem users in Arizona of the proposed interim surplus criteria, the other provisions of California's 4.4 Plan, the policy of Reclamation regarding the use of effluent on the river and the proposed reallocation of the CAP project water supply in conjunction with settlements of CAP and Indian water rights disputes.
- 12 Absent more information on the relative priorities among fourth priority users in Arizona, and the relative increased risk of shortage over time to the various classes of users in Arizona, the Mohave County Water Authority must object to any but the no action alternative.

Sincerely,



MAUREEN R. GEORGE

Secretary-Treasurer

Mohave County Water Authority

c: Mohave County Water Authority Board of Directors  
Lake Havasu City Mayor and City Council  
Bruce Williams, City Manager

6: See response to Comment 56-32, regarding reparations.

7: See response to Comment 56-32, regarding reparations.

8: See response to Comment 33-3.

9: See response to Comment 53-16 for a discussion of depletion schedules.

10: Comment noted. The evaluation of Arizona's groundwater banking programs is outside the scope of this project.

11: No cumulative impacts have been identified for the issues raised in this comment. Note that potential effects on water users in Arizona are identified in Section 3.4 of the EIS.

12: We have modified the reference to reductions in times of shortage in the third paragraph on page 3.4-15, to recognize that in Arizona a reduction in the amount of Colorado River water available to fourth priority users would be shared pro rata among CAP and non-CAP entitlement holders.