

## COMMENT LETTER

## RESPONSES



SEP 30 2000

September 8, 2000

Regional Director, Lower Colorado Region  
c/o Jayne Harkins ( LC-4600)  
Bureau of Reclamation  
P.O. Box 61470  
Boulder City, NV 89006-1470

Dear Ms. Harkins:

This letter presents the Authority's comments on the Bureau of Reclamation's July 2000 Colorado River Interim Surplus Criteria Draft Environmental Impact Statement (DEIS). Surplus criteria are linked to other key elements of California's Colorado River Water Use Plan, including the Authority's core water transfer with the Imperial Irrigation District and the quantification of California's priority system for Colorado River water users. The implementation of appropriate surplus criteria is thus necessary to enable other critical programs for reducing California's demand on Colorado River water supplies above the state's basic apportionment.

1: Comment noted.

The Authority supports and urges the Bureau to adopt and implement the surplus criteria guidelines proposed and presented by all seven Colorado River Basin states to the Department of Interior on July 27, 2000. The guidelines, which were published by the DOI as supplemental information to the DEIS, were the product of intensive review and study by all seven states over a period of several years. All seven states are in agreement that the guidelines will produce the interim surplus water needed by California, without creating unmitigated risk to Arizona or other lower division water users.

Because the surplus criteria are linked to other California Plan elements, it is essential that all elements move forward in a coordinated fashion. The seven states' proposal, for example, makes surplus guidelines effective only after the quantification settlement agreement becomes effective. Surplus guidelines are also a required condition for the Authority's water exchange agreement with the Metropolitan Water District, which is needed to transport up to 200,000 af of conserved agricultural water from the Imperial Valley to the Authority for future urban use. California's agencies have obligations to develop programs that offset demand for Colorado River water by specific dates. The guidelines contain benchmarks to ensure that California makes progress on developing the programs needed to reduce demand. If sufficient progress is not made, the surplus guidelines are subject to termination.

Potential impacts from use of the seven states' surplus guidelines fall within the range of alternatives analysis contained in the DEIS. We believe no important parameter studied in Chapter 3 of the DEIS, Affected Environment and Environmental Consequences, would be outside the range of alternatives already reviewed. Computer modeling by the seven states has shown that impacts on reservoir system operation, reservoir elevations,

2: Reclamation concurs with the position expressed in this comment with respect to the Basin State alternative included in this FEIS.

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below

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and water supplies would likely fall in a bandwidth between modeling results from the "California" and "Six States" alternatives reviewed by the DEIS. The same result holds true for the remaining factors reviewed in this chapter, such as riverflow issues, aquatic resources, special-status species, recreation, and energy resources.

3

The DEIS specifically requested comments regarding appropriate baseline criteria. While a case might be made for utilizing either the "75R" or "70R" strategy for baseline conditions, to in effect recreate recent Annual Operating Plan history, we feel the differences between the two strategies are too slight to be of any consequence for the comparison of surplus criteria alternatives. The choice is even less consequential after considering that the Secretary currently enjoys discretion to declare surplus based upon varying year-to-year water conditions, as noted in the DEIS. Neither strategy is fully capable of mimicking the recent history of surplus declarations. It should be noted that the seven states' surplus guidelines proposes using the "70R" strategy, both as a specified level of surplus during the interim period, and as the basis for surplus determinations after the interim period.

We appreciate the work the Bureau has done preparing the DEIS. Should you have any questions regarding the Authority's comments, please contact Mr. Dave Fogerson at 619-682-4153.

Sincerely,



Gordon A. Hess  
Director of Imported Water

3: Reclamation has noted the comment regarding the relative roles of 70R and 75R strategies in portraying differences among alternatives. See response to Comment 57-11 for additional information.