SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

September 8, 2000

4600

Mr. Robert W. Johnson
Regional Director, Lower Colorado Region
Attn: Jayne Harkins (LC-4600)
Bureau of Reclamation
P.O. Box 61470
Boulder City, NV 89006-1470

VIA FACSIMILE
(702) 293-8042

Comments to the Draft Environmental Impact Statement for the Colorado River Interim Surplus Criteria

Dear Mr. Johnson

By your letter dated Jun 29, 2000, you solicited comments to the Draft Environmental Impact Statement (DEIS) that analyzes potential environmental impacts of adopting specific interim criteria under which surplus water conditions may be declared in the Lower Colorado River Basin during an interim period that would extend through 2105. The comments of the Southern California Edison Company (Edison) to the DEIS are provided below.

Edison finds that the DEIS is flawed in at least three areas: determination of base line alternative conditions, lack of mitigation measures, and understatement of environmental impacts due to reduced capacity.

Determination of Baseline Alternative Conditions

1 | The no action alternative and baseline conditions do not represent the consensus of the entities linked to the Lower Colorado River. The baseline alternative represents a new condition that has not been reviewed by water and power users of the lower Colorado River system. The proposed baseline conditions are not consistent with the conditions provided by the U.S. Bureau of Reclamation (Reclamation) in the annual rate process associated with the Boulder Canyon Project. The DEIS forecasts higher energy amounts than the amounts forecast by the annual rate process for the Boulder Canyon Project. The higher energy amounts in the DEIS imply a higher lake elevation than that implied in the Boulder Canyon Project rate process.

For example, the latest rate process for the Boulder Canyon Project shows energy generation to equal 4,501,001 MWh for the period 2004 through 2017 which is equivalent to a lake surface elevation of 1,159 feet. The DEIS shows the baseline energy amount to be 4,623 MWh during the year 2017 and a lake surface elevation of 1,170 feet. The amounts in the DEIS are greater than the amount used to develop firm power rates for the Boulder Canyon Project.

The baseline seems to be defined in a way which would preclude findings of significant impact. Under the described baseline condition, water levels at Lake Powell and Lake Mead would

P.O. Box 800
Rosemead, CA 91770-0800

1: The 70R strategy is used for the baseline in this FEIS. Reclamation has updated the surplus depletion schedules for California, Arizona and Nevada. This and other changed modeling assumptions could account for the increased energy amounts in this process. The updated schedules will be utilized in future annual rate processes. Reclamation believes the baseline used appropriately reflects future conditions.

steadily decline over the study period. The declaration of surplus water at these sites would further reduce water levels, but apparently not significantly. If the baseline were defined differently, the lowering of water levels associated with each alternative might be found to cause more significant environmental effects. It would seem more reasonable to describe the baseline as including relatively full reservoirs, with water releases and energy production at current and/or historic average levels.

Lack of Mitigation Measures

2 | Another weakness of the DEIS is the failure to identify any mitigation measures. It might be argued that the failure to find significant environmental impacts precludes the need to identify mitigation measures. However, if the comparison to a more reasonable baseline were made, the impacts might be found to be of greater significance, thus requiring mitigation.

Reclamation should consult with the water and power entities of the lower Colorado River system to identify the baseline conditions for all users of the lower Colorado River system.

Environmental Impacts of Reduced Capacity

3 | The DEIS trivializes the impact of replacing capacity and generation lost as a result of a lowering elevation of Lake Mead. The load following capability of Hoover is one of the best in the west. Hoover can change operating levels at a rate at least ten times faster than present fossil fueled generation plants. Each MW of reduction would have to be replaced by at least ten MW of conventional fossil generation. Carried to the extreme, Hoover is equivalent to about 20,000 MW of load following capability from fossil fueled generation. Since no large hydroelectric generation sites are planned for construction in the WSCC, the amount of lost load following capability will come from other resources including fossil fueled generation with attendant environmental consequences.

The DEIS should be expanded to assess the amount of capacity that would have to be replaced to supply load following capability and the environmental impact of the replacement capacity.

Thank you for giving Edison an opportunity to provide comments.

Sincerely,

Tamma L. Dayne

2: Comment noted. Although no impacts were identified that required mitigation, the FEIS includes a discussion of environmental commitments in Section 3.17. Note also that the baseline used in the FEIS (a 70R operating strategy) has been modified from that presented in the DEIS (a 75R operating strategy).

3: As discussed in Section 3.10.2.2 of the FEIS, Reclamation recognizes that the load-following capability of Hoover is important. The differences in the amount of capacity available for load-following between the baseline strategy and the alternatives is identified in the EIS.