

COMMENT LETTER

RESPONSES

21

- 146 | Page 3.4-18, Figure 3.4-8
There should be some discussion of what this figure shows in the text. The scale of these is also such that they are hard to read. It is obviously related to Figure 3.4-5 and this should be acknowledged.
- 147 | Page 3.4-19, 3.4.4.2
The assumption that under baseline condition California would have to live within its 4.4 maf allocation by 2004 (when Arizona and Nevada using their full apportionments) should also be part of the explanation under California depletion graphs earlier in this section.
- 148 | Page 3.4-19, 3.4.4.2.1
Figure 3.4-9 has several issues of concern. First, the 90th percentile line is higher than the surplus depletion line that California says it wants into the future. If California is not diverting at that level, then how can 10% of the depletions be above it? Between 2000-04, California wants more water than the 90th percentile, so would this be when some of the 10% would occur?
- 149 | Page 3.4-22, Figure 3.4-12
It is very interesting in that it clearly shows the benefits of having surplus to extend the amount of time California can continue to use above its 4.4 maf allocation.
- 150 | Page 3.4-23, Table 3.4-2
Why are the percentage chances for surplus so much different between the three states?
- 151 | Page 3.4-24, 3.4.4.3.1
Figure 3.4-13 has the same basic questions under Nevada as it does for Arizona and California.
- 152 | Page 3.4-25, 3.4.4.3.1
paragraph 3: Why does the surplus probability vary so much between the States? Is it based on the depletion schedules?
- 153 | Page 3.4-27
paragraph 2: Where in the document was Nevada's use of unallocated Arizona water in the first three years discussed?
- 154 | Page 3.4-29, Table 3.4-3
Why is the surplus probability 91% under Nevada but not as high for California and Arizona?
- 155 | Page 3.4-29, 3.4.4.5
paragraph 1: Why was the basis for modeling Mexico's flows at 1.515 maf not addressed earlier in the DEIS under the modeling assumptions?

146: Paragraphs 1 through 4 in Section 3.4.4.1.2 include the subject discussion.

147: Figures 3.4-9 through 3.4-12 present the outcome of the modeling results in terms of the frequency and magnitude of surplus condition water supplies available to California under the baseline and surplus alternatives. California has developed a Colorado River Water Use Plan (the "Plan"). The Plan is a framework by which programs, projects, actions, policies and other activities would be coordinated and cooperatively implemented allowing California to meet its Colorado River water needs within its basic apportionment in Normal years. See response to Comment 11-11 for additional information on California's Colorado River Water Use Plan.

148: See response to Comment 57-133.

149: Comment noted.

150: We assume that you are referring to differences between Tables 3.4-1, 3.4-2, and 3.4-3. There are a number of reasons for the differences. First, there were inconsistencies in surplus depletion schedules between alternatives in the DEIS. This has been corrected in the FEIS. Second, Arizona has not reached full use of its apportionment, and it was assumed that California would thus be able to use additional water. Third, there were typographical errors. These three tables have been modified in the FEIS.

151: Section 3.4.4.3.1 describes Figure 3.4-13. Also, please see the response to Comment No. 57-141.

152: See response to Comment 57-150.

153: Nevada currently uses all of the Colorado River water apportioned for use within the State of Nevada. Arizona's depletion schedule in the DEIS indicates that Arizona does not anticipate using its entire Colorado River water apportionment until 2005. During this period, the difference between Arizona's normal apportionment and the scheduled depletion is classified as unused apportionment water. This unused apportionment water is made available to the other Lower Division states if a demand for such water exists. Text discussing this use has been added to Section 3.4.3.2. In Attachment H of the FEIS under the discussion entitled "Normal depletion schedules with and without California transfers" this text has been added explaining Arizona's unused apportionment.

154: The percentage values for Nevada under baseline conditions and the Flood Control Alternative in DEIS Table 3.4-3, Years 2001 to 2015, are incorrect. The correct values should have been 50 percent under baseline conditions and 52 percent under the Flood Control Alternative. This information will be updated for the FEIS using the new modeling output for the baseline and surplus alternatives.

155: This additional modeling detail has been added to the modeling assumptions listed under "Assumptions Common to Baseline and All Alternatives" in Section 3.3.3.3.

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RESPONSES

22

- 156 | Page 3.4-30, Figure 3.4-17
Why does the 50th percentile line drop so quickly under the baseline condition, when the levels of Lake Mead remain high?
- 157 | Page 3.4-32, 3.4.4.5.2
This section needs to explain more fully the change in probability for Mexico to obtain a surplus, and why the shortage line does not get lower. Shortage conditions for Arizona and Nevada are shown in the respective graphs for those states.
- 158 | Page 3.4-34, Table 3.4-4
As in the other tables of this type, please provide more information in the text about the meaning of the changes in percentages. Are these surplus percentages percent of years or of the normal percentage? What does this change really mean to flows below Morelos Dam?
- Water Quality*
- 159 | Page 3.5-1, 3.5.2.1
paragraph 1: The reason for the 2015 date should be noted here. It may be confused with the expiration date of the surplus criteria.
- 160 | Page 3.5-6, 3.5.2.2.2
paragraph 6: It might be worth noting that there are no return flows to the Colorado River from the major depletions of water to MWD, CAP, IID and CVWD.
- 161 | Page 3.5-7, 3.5.2.2.3
paragraph 4: Costs of implementing additional salinity controls due to any increases that result from the surplus criteria or the water transfers.
- 162 | Page 3.5-8, 3.5.1.2
paragraph 1: The explanation in this paragraph is unclear. The 2nd sentence should end with "than under the baseline." The remaining explanation is difficult because the source of the numbers is not given, nor is the rationale fully developed.
- 163 | Page 3.5-9, Table 3.5-1
Please explain why the Shortage Protection has a -3 under Imperial Dam when the other two liberal alternatives have +4 and +1 respectively? Why do these three figures differ?
- 164 | Page 3.5-11, 3.5.2.3.6
paragraph 1: What about over the 2016-2050 time period?
- 165 | paragraph 3: Are there any studies for these areas as were referenced in paragraph 2?

156: The probability of surplus water deliveries to the Lower Basin states and Mexico is highest in the early years due to the starting high reservoir conditions that were modeled. To a lesser extent, this is also affected by the increasing total basin depletions. It should be noted in the DEIS from Figure 3.3-13 that Lake Mead elevations decrease over time in all alternatives. Figure 3.4-30 is in reference to Mexico's modeled annual depletions under baseline conditions and shows Mexico's annual treaty depletion over time.

157: The effect of interim surplus criteria on the delivery of surplus flows to Mexico is best depicted by Figure 3.4-18 (for years 2001 to 2015) and Figure 3.4-19 (for years 2016 to 2050) in the DEIS. This information is also summarized in Table 3.4-4. The Colorado River water supply deliveries to Mexico never dropped below 1.5 maf under the modeled conditions and as such, the respective figures depict this.

158: See response to Comment 57-145. The FEIS results show a potential for a small reduction (3 to 6 percent) in the frequency of excess flows under the Basin States, Six States, California and Shortage Protection alternatives and a potential for a small increase (1 percent) in the frequency of flows under the Flood Control Alternative, when compared to the baseline conditions for year 2016.

159: The text has been revised in the FEIS to provide clarification.

160: Comment noted. However, Reclamation does not believe that this information would aid in understanding the flow system of the river at this point in the discussion.

161: Reclamation has considered this request; however, because modeling conducted for the FEIS indicated a general reduction in salinity under each of the alternatives it was determined that this information was not necessary. The effects of transfers associated with Secretarial Implementation Agreements will be considered under separate NEPA compliance.

162: The referenced paragraph has been revised for clarification.

163: Note that the information in Table 3.5-1 has been updated with modeling conducted for the FEIS.

164: Because of the uncertainty of the long-range salinity control projects, projections of future control projects that may be necessary to offset the effects of future water development beyond 2015 have not been made by the Forum. Note that modeling for the EIS considers only those salinity control programs currently in place.

165: Reclamation is not aware of any studies of damages in localized areas such as Laughlin.